

**From:** [REDACTED]  
**Sent:** 05 March 2024 21:05  
**To:** [EHDC - Local Plan](#)  
**Subject:** BJC Planning - Local Plan Team  
**Attachments:** [2024.03.04 planning statement re Local Plan.pdf](#)  
[2023.03.25 Wider concept diagram.pdf](#)  
[2024.03.05 Landscape Plan.pdf](#)

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**Categories:** Consultation Responses

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Dear Sir/Madam

I have tried to answer questions and make comments on the online Local Plan Consultation but I have no idea if they have been received. My email appears to have failed to register. So I am emailing a Statement that I have made in respect to the allocations in Rowlands Castle.

Yours sincerely

[REDACTED]

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**BJC PLANNING**

**PLANNING STATEMENT**

**LAND AT**

**MAYS COPPICE FARM  
WHICHERS GATE ROAD, ROWLANDS CASTLE PO9 5NE**

**RESPONSE TO THE REG 18: LOCAL PLAN 2021-2040 CONSULTATION**

**On Behalf of Land and Partners Ltd**

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March 2024



## **1.0 INTRODUCTION**

- 1.1 The Draft Reg 18 Local Plan 2021-2040 was published for Consultation in January with a deadline for comments of the 4 March. The Consultation invites comments and responses to a series of Questions, but these are not site specific. As well as response to the Questions we regard this Consultation as an opportunity to update the case for the allocation of the site at Mays Coppice Farm, Whichers Gate Road.
- 1.2 The site was put forward in the Emerging Local Plan in 2022. In the intervening period, the reports and documentation have been updated. We also held an Exhibition in Rowlands Castle Parish Hall last July to display the plans supporting the site. 90 residents attended and 45 made comments on the proposals.
- 1.3 The Consultation Plan has allocated four sites in Rowlands Castle Parish, and it is considered that the site at Mays Coppice Farm has greater merits than the site at Little Leigh Farm.
- 1.4 The SHLAA dated 2023 also stated that the site was 'developable' which means that the decision not to allocate the site was marginal. This is regarded as particularly relevant because we question the decision to give priority to allocate the site at Little Park Farm without a comprehensive examination of the comparative merits of the two sites.
- 1.5 Little Park Farm is only favoured because it is in the Rowlands Parish, but it is situated at a considerable distance from Rowlands Castle village centre. It is on the boundary of Havant Borough and the new residents will undoubtedly look to services there. For this reason, it cannot support the 'vitality and viability' of the shops and facilities in the village centre in contrast to the site at Mays Coppice Farm.
- 1.6 These issues will be examined in this statement.

## 2.0 THE DEVELOPMENT POTENTIAL

- 2.1 There were three main objections to the development of the land at Mays Coppice Farm at the previous stage.
- 2.2 The Council regarded that the site was remote from the main part of the village. However, the proposed allocation of the site at Oaklands House means that there is just a small woodland separating the two sites.
- 2.3 Mays Coppice Farm is just 800 metres from St. Johns CEC Primary School. The catchment of the school is very large. It includes Little Park Farm that lies over a kilometre distant to the south and it is a very large area of the Parish to the north. Children from these areas would not be able to walk to school and would in many cases probably be taken to school by car by their parents.
- 2.4 The other issue was pedestrian access to the village. We have been exploring the possibility of gaining a pedestrian and cycleway link to the village via The Drift. We have contacted the owners of the land to the north (Avens Winnicott land) to see if they would agree to allow access to The Drift through their land to the village in exchange for facilitating vehicular access to the Whichers Gate Road for the development of the land to the north of our site (see Plan).
- 2.5 We can then offer a paved pathway which can be lit. We expect to reach agreement with the landowners but if this proves impossible we can still offer the improvement of the Bridleway. We would have to rely on linking to the PROW at the northern extent of our site to facilitate access to the village centre to by-pass the land to the north.
- 2.6 This would make the site more accessible to the village shops and facilities. The village shops and the Railway Station can be reached on foot and by cycle. The distance from the site to the shops via this route would be marginally less than the site at Oaklands (1.29km as opposed to 1.35km). There are bus stops on Redhill Road close to the junction of The Drift and Redhill Road where there are services in both directions.
- 2.7 One of the objectives of the 'made' Neighbourhood Plan is to contribute to the vitality and viability of the village centre which our site would do. (Page 45 of the NDP). Policy 7 states:-
- The community is committed to retain the vitality and viability of the centre and this policy sets out some overall requirements for development. The policy is intended to improve the quality of the built environment, contribute to the overall character of the village, promote a village that functions as a single community, and helps to enhance community life with the retention of business activities and facilities.**
- 2.8 The landscape consultants, Fabrik UK, were instructed in 2023 to review the site. The practice identified areas where development could take place. These areas have the capacity to provide over 100 dwellings.

2.9 These issues are reviewed in the context of the four new housing allocations in Rowlands Castle Parish in the Emerging Local Plan.

### **3.0 THE DRAFT REG 18 LOCAL PLAN 2021-2040**

3.1 The Draft Reg 18 Local Plan 2021-2040 has been examined in detail so that the proposals can be compared to the merits of the site at Mays Coppice Farm. Attention has been drawn to the fact that the SHLAA dated 2023 also stated that the site was 'developable' which means that the decision not to allocate the site was marginal.

3.2 The Local Plan has confirmed that Rowlands Castle is a settlement that offers a 'range of facilities and services'. It is a Tier 3 settlement. It states on page 440 that:-

**In the revised settlement hierarchy of this Draft Local Plan, Rowlands Castle is identified as a Tier 3 settlement. This indicates that it has a range of facilities and services for meeting some of the everyday needs of local residents.**

3.3 One of the Policies of the 'made' Neighbourhood Plan seeks to maintain these services. It has the specific and fundamental objective of maintaining the 'vitality and viability of the village centre'. (Page 45 of the NDP). Policy 7 states:-

**The community is committed to retain the vitality and viability of the centre and this policy sets out some overall requirements for development. The policy is intended to improve the quality of the built environment, contribute to the overall character of the village, promote a village that functions as a single community, and helps to enhance community life with the retention of business activities and facilities.**

3.4 The development of housing on the site at Mays Coppice Farm can ensure that many of the new residents could walk or cycle to the village centre.

#### Four new housing allocations in Rowlands Castle

3.5 The Plan proposes four sites to meet its housing requirement. Two of these sites are close to the village centre (at Deers Leap (North) (RLC1) and Deers Leap (South) (RLC2). They have limited capacity offering just a total of 13 dwellings and they have physical issues including the potential impact upon sites of heritage significance. The Plan states with regard to Deers Leap (South) that:-

**the site is located in the Rowlands Castle Conservation Area and includes a small part of the scheduled ancient monument for Rowlands Castle.**

3.6 The Plan also notes that planning permission has granted for a site now known as Montague Green. The housing on the site has been completed.

- 3.7 There are two other allocations that are particularly relevant to the consideration of the site at Mays Coppice off Whichers Gate Road. These are Oaklands House off Whichers Gate Road (RLC3) and Land at Little Leigh Farm off Prospect Lane (RLC4). Both of these proposed allocations have been the subject of comments by HCC Highways and comparison can be made with the site at Mays Coppice. The comparisons are considered in detail in respect of each site.

### **Oaklands House off Whichers Gate Road**

- 3.8 This site is expected to provide 51 dwellings. It is on the other side of Bridleway 24 with just an area of woodland separating it from the Mays Coppice site off Whichers Gate Road.

- 3.9 The Plan states that:-

**The site is located on the south-west edge of Rowlands Castle, adjoining recent housing development and Whichers Gate Road. Land to the north and west of the site is woodland that contains The Shipwrights Way and The Staunton Way, which are long-distance public rights of way. The western boundary of the site adjoins Woodlands Avenue and associated drainage infrastructure.**

- 3.10 Under 'Infrastructure Requirements' the Plan states that-

**Access: A vehicular access point on the three-arm roundabout junction of Woodlands Avenue and new walking and cycling infrastructure would be necessary to support development. Developer contributions towards improved traffic management within the village and towards accessibility and signage at Rowlands Castle Railway Station will also be required.**

- 3.11 With regard to highway access to Whichers Gate Road the Plan states:-

**Access: connection to the local road network could be achieved via Woodland Avenue, by providing an additional access point to the adjoining roundabout.**

- 3.12 The Local Plan gives Reasons for Inclusion of the Site, as follows:-

**The site is very close to a primary school and could be integrated with pedestrian footpaths of the adjoining residential development to increase connectivity to services and facilities in central Rowlands Castle. The site scores above average in the Local Planning Authority's Accessibility Study. Impacts on environmental designations (biodiversity, flood risks) could be avoided or mitigated by appropriate design and layout, for example by leaving valuable habitats free of development and leaving a suitable buffer of open space or landscaping between new buildings and the woodland environs. Similarly, landscape impacts could be mitigated by retaining and augmenting the existing tree cover and hedgerows within the site and on its boundaries, to retain the site's sense of containment and help to achieve a net gain in biodiversity. This would also ensure that impacts on the local green space would be avoided.**

### **Mays Coppice Farm**

- 3.13 The Mays Coppice site lies approximately 1.29 km away from the centre of Rowland Castle by the proposed footpath via The Drift. The Oaklands House site is slightly further away at 1.35km.
- 3.14 It is recognised that the Oaklands House site is in very close proximity to the primary school the site but the site at Mays Coppice Farm lies approximately 800m from St. Johns CEC Primary School. While it is preferable that the pupils have a very short walk to school the benefits of Oaklands House site would be limited to the few children that live there. On the other hand, the catchment of the school is very large. It includes Little Park Farm that lies over a kilometre distant to the south and a very large area of the Parish to the north. Children from these areas are would not be able to walk to school and would in many cases probably to be taken to school by car by their parents.
- 3.15 Oaklands House site and Mays Coppice Farm are both within the catchment of Horndean Technical College (known previously as Horndean Community School) at Barton Cross (PO8 9PQ). The school is approximately 7 kilometres from these sites. This is not within walking distance and there is no footpath on the B2148. Therefore, children will need to take a bus or be taken by car. The roads would be regarded as too dangerous to cycle.
- 3.16 The Oaklands House site is already being proposed for development and there has been a recent public exhibition of the proposals in the Merchiston Hall in Horndean.
- 3.17 The development of land at Mays Coppice Farm would provide for a large area to be left free of development. The issues of biodiversity and flood risk could be mitigated. A site for Local Green Space as set out in the Neighbourhood Plan has been set aside in agreement with the Parish Council. There are no constraints to the development of the site. The highway issues are being examined by a highway consultancy.

### **LAND AT LITTLE LEIGH FARM (RLC4)**

- 3.18 This site is proposed for 81 dwellings. The Plan states that:-
- This site falls within Rowlands Castle parish but relates to the built-up area of Havant Borough Council, to the south, on Prospect Lane.**
- 3.19 The Local Plan recognises that the location is not ideal. The site isn't shown on Figure 12,25: entitled: Location of outstanding permissions and propose sites in Rowlands Castle. It states, on page 439, that:-
- \*Note: Proposed development at Little Leigh Farm is not shown on the above map. This site falls within Rowlands Castle parish but relates to the built-up area of Havant Borough Council, to the south, on Prospect Lane.**
- 3.20 The site is 1 km from Whichers Gate Road. Under the Summary of Reasons for Inclusion Page 450) the text states:

**New vehicular access could be provided onto Prospect Lane, whilst the site could be connected to existing routes and pedestrian infrastructure within Havant Borough Council's area.**

3.21 The Plan is silent on how the site will be connected to existing and routes and what works will be required to Prospect Lane to address the additional traffic.

3.22 Under 'Site Description' the Plan states that:-

**The site is located in the far south of the Local Plan Area, adjoining housing development in Havant Borough Council's area. Residential areas lie to the south and west of the site. Land to the north and east of the site is undeveloped. Rowlands Castle lies a short distance to the north along Prospect Lane. The Shipwrights Way, a long-distance public right of way, runs along Prospect Lane (although there is no dedicated footpath to the north). Access: connection to the local road network could be achieved along the western boundary with Prospect Lane. There is potential to link the site with public rights of way, connecting the site to areas such as Staunton Country Park (which lies a short distance to the west), thus encouraging healthy & active lifestyles.**

3.23 The description recognises that '**there is no dedicated footpath to the north**' (i.e. along Prospect Lane).

3.24 It is noted that the site is accessed from Prospect Lane. Under 'Constraints and Opportunities' the Plan states that:-

**Access: connection to the local road network could be achieved along the western boundary with Prospect Lane.**

3.25 Under 'Infrastructure Requirements' the Plan states that-

**Access: A vehicular access point on Prospect Lane would be necessary to support development. The location of the access point will need to ensure safe access and egress into the site and may not coincide with the existing field access. New pedestrian and cycling infrastructure would also be necessary to support development.**

3.26 The Plan recognises the need for 'pedestrian and cycling infrastructure' but it does not refer to any specific proposals. The Local Plan only refers to the benefits of proximity to 'pedestrian infrastructure in Havant' yet the site falls within the catchment of St. Johns CEC Primary School.

**New vehicular access could be provided onto Prospect Lane, whilst the site could be connected to existing routes and pedestrian infrastructure within Havant Borough Council's area.**

3.27 There is no assessment in the Local Plan of the distribution of traffic but there must be a proportion that travels north along Prospect Lane to the junction with Whichers Gate Road. There are no footpaths along Prospect Lane, but walkers and cyclists will travel along the Lane because it forms the route of the Shipwrights Way. Walkers and cyclists then have to cross Whichers Gate



Road to continue their walk north along the Shipwrights Way (Bridleway 24) into Rowlands Castle.

- 3.28 Prospect Lane north of Standsted Crescent is narrow, has insufficient width for two cars to pass and there is no footway provision. It is also subject to a stop line at its junction with the B2148 due to obstructed visibility. This obstruction is due the fact that the owners of the dwelling on the south west corner of Whichers Gate Road at the junction with Prospect Lane have built a substantial wall on highway land. Improvements could be made to this junction if the highway authority took action to acquire this land.
- 3.29 It will inevitably increase all forms of movement along Prospect Lane but no improvements are proposed for walkers or cyclists even though the Lane serves walkers on the National Routes part of long-distance footpaths, Staunton Way and Shipwrights Way.
- 3.30 It is obvious that Prospect Lane in its current form would be considered inappropriate for intensification of its use. The Highway Authority needs to provide guidance on the improvements to the Lane that are necessary to make it safe for pedestrians and cyclists and how they should be funded.

### Access to Schools

- 3.31 The site at Prospect Lane is relatively close to the Academy School in Wakesford Way. However, this school is in Leigh Park in the Borough of Havant. The sites at Oaklands House and Mays Coppice Farm are beyond the catchment to of this school and it is understood that they both rely on Horndean Technical School. It is noted that the site at Little Leigh Farm falls within the catchment of the Rowlands Castle Primary School. It seems inevitable that some children at Little Leigh Farm will travel to the School along Prospect Lane.
- 3.32 The site at Little Leigh Farm is relatively distant from Rowlands Castle village centre and the residents could not contribute to the 'vitality and viability' of the village centre. The residents would inevitably look to shops and services in Havant. This is in contrast to the site at Mays Coppice Farm.
- 3.33 It is noted that this site adjoins the Gap that Neighbourhood Plan seeks to protect. The policy in the Neighbourhood Plan states in respect of Gaps between Settlements (page 12) that:-

#### **Policy 1 Gaps between Settlements**

**1. The integrity of the predominantly open and undeveloped character of the gap between Rowlands Castle and Havant, as shown on maps 2 and 3, will be retained and protected to prevent coalescence, retain the identity of the separate settlements, protect the landscape and ecological features, and protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle.**

**2. Proposals for built development within the defined Gap will only be supported where they would not compromise the integrity of the Gap, and the**

**visual and physical separation of Rowlands Castle and Havant, either individually or cumulatively with other existing or proposed development.**

- 3.34 It is difficult to comprehend the decision to favour the site at Little Park Farm. It offers no benefits to Rowlands Castle village. It breaches the policies of the Neighbourhood Plan in respect of the objective to maintain the vitality and viability of the village centre. It is noted that the site adjoins the Gap and the supporting text under 'Reasons for Inclusion' states:-

**Due to the absence of any visual containment on the northern site boundary, new landscaping would be needed in this area and should be established prior to any residential development. This could help to address landscape concerns and mitigate visual impacts on the undeveloped gap.**

- 3.35 Given the distances of Little Leigh Farm from the centre of Rowlands Castle, its distances from the primary school, the fact that it is served by Prospect Lane which has no footpath and there are no proposals to improve accessibility it is very difficult to see why this site is favoured.

## **4.0 THE SITE AT MAYS COPPICE FARM**

- 4.1 Mays Coppice Farm is situated on the southern side of the settlement of Rowlands Castle. It lies to the northeast of Whichers Gate Road (B2148) which runs in a northwest to southeast direction, and links Emsworth to Horndean. To the east of the farm complex, the Portsmouth to London (Waterloo) railway line passes the site, running southeast to northwest. Rowlands Castle railway station lies to the north of the site (2.2 km/1.3miles).
- 4.2 A woodland copse, known as Oaklands Woodland, lies to the west of the site. This copse separates Mays Coppice Farm from the Oaklands House site.
- 4.3 A bridleway (No. 24) lies close to the western boundary of the farmland. This bridleway leads from Whichers Gate Road to the centre of Rowlands Castle. This bridleway is part of long-distance footpaths, Staunton Way and Shipwrights Way. The bridleway is lined by trees and an indigenous woodland strip, 20m wide. The woodland strip was planted over 10 years ago within the farmland of Mays Coppice Farm.
- 4.4 The land is screened from view from the south by the continuous buffer of woodland fronting Whichers Gate Road. A mature, mixed-deciduous hedgerow forms an existing internal boundary within the site to the southeast of the proposed housing. This separates the land to the south-east from the proposed housing. This area is available for drainage ponds to provide for surface water attenuation and for structural planting. A drainage engineer stated that this area was sufficient to serve the proposed Garden Centre that was proposed in 2010.
- 4.5 Towards the northern end of the of the site an area the land is defined by a line of trees and by a substantial hedge. These trees and hedge provide some screening from the north. The existing buildings at Mays Coppice Farm also



provide screening from land to the northeast. The undulations of the land further screen some part of the site. The views of the site from the South Downs National Park are very limited and those areas that could be seen will not be developed.

- 4.6 On the opposite side of Whichers Gate Road there is frontage development extending to the north-west from the site towards Redhill Road. There is a Public House and a Shell Garage on the double roundabout at the junction with Manor Lodge Road, Durrants Road and Redhill Road.
- 4.7 The site would gain access via the existing agricultural access on Whichers Gate Road which would be improved. This access point was found to be acceptable by Hampshire Highway Authority to serve the Garden Centre proposals in 2012.
- 4.8 There are shops and a public house in the village. The Parish Hall provides rooms for a range of activities. There are extensive playing fields and a community building serving as a changing facility. The village enjoys close proximity to the Rowlands Castle Golf Club and the Rowlands Castle Tennis Club. There is a church.

## **5.0 THE DEVELOPMENT PROPOSALS**

- 5.1 The site can accommodate approximately 100 dwellings. This could comprise approximately 60 custom plots or an alternative mix of housing and 40 affordable dwellings. It is proposed that the private housing should be mainly custom build housing possible with small enclaves of self build housing but this is open for discussion.
- 5.2 Control over the design of the layout and the plots can be achieved with the aid of a 'Design Parameters Guide'. It is usually a condition of planning permissions of custom and self build schemes to be guided by Plot Passports which are prepared for each of the plots.
- 5.3 Plots passports are an integral part of the custom build/self build model. They provide the means of regulating the design of the development to ensure that it can achieve the objective of good design.
- 5.4 Custom build offers the option of a serviced plot where individuals can design and build their own home as part of a larger scheme. The development is coordinated so that there is a common design theme, but the details and materials can vary.
- 5.5 Self and custom build is supported in the Consultation Local Plan (see paragraphs 306-307). Policy DM16.1 states that:-

**Proposals for Self-build and custom housebuilding within settlement policy boundaries will be supported subject to the following matters being met:**

- i. the proposed development has no significant adverse effect on the local character; and**

- ii. **Serviced plots made available should respond to the needs of the individuals and groups on the Local Planning Authority's self and custom build register at the time of the application; and**
- iii. **Plots should be priced and marketed appropriately as self-build or custom-build plots for at least 12 months. (see Appendix D).**

5.6 The Section "Implementing the Policy", paragraph 11.04, states that:-

**A proportion of the total home's numbers shall be available for sale as self-build and/or custom housebuilding plots where there is an identified need on our Self-build and Custom Housebuilding Register on all new residential development schemes.**

5.7 It is not clear if this Policy has been applied to the new allocations in Rowlands Castle Parish.

5.8 The developers of self and custom build plots seek the highest quality of designs, and any development would meet the requirements of Policy DM16.1. Similarly, they seek the highest standards of fuel economy, and these will satisfy the Local Plan Policies in respect of carbon reduction and climate change.

5.9 There are approximately 3200 residents in Rowlands Castle Parish of the 125,700 people in the District and 1400 households (page 437 of the Local Plan). The age sex structure shows the greatest number in the 45 to 64 years cohorts. The issue of an ageing population needs to be addressed.

5.10 The land is currently used to grow hay and for occasional grazing of sheep on a licence basis by a local farmer. If the proposed development is supported and the farmland is taken out of agricultural use, it is expected that the owners will explore the use of their remaining land for further nutrient offsetting, bio-diversity net gain, re-wilding and green infrastructure. An ecology corridor can be created from the south west corner of the site to the corner of the fields in the north east area of the site (as Shown on the Fabrik Plan)

5.11 This area comprises farmland, the existing dwellings, existing commercial and farm buildings but the owners are cooperating with the promoter.

5.12 The Parish Council has proposed a Local Green Space close to the western boundary of the site. It covers much of the land between Mays Coppice Farm and Oaklands House. This was agreed by the landowners.

## **6.0 PUBLIC EXHIBITION**

6.1 A public exhibition was held on the 6 July 2023 at the Parish Hall. 90 people attended and 45 people completed the Response Form. Nine display boards were erected and five representatives of the company promoting the development answered any questions.

- 6.2 The analysis of the Response Forms revealed some confusion about the proposals. It was explained that the government was seeking to reduce the area of land in agricultural use in order to reduce the amount of pollution in rivers and the sea. It was made clear that a large area of the site would be set aside to address the issues of nutrient mitigation and biodiversity. There were proposals for tree planting.
- 6.3 Most of the respondents were opposed to any development. The main issue raised was against the proposals was the impact of additional traffic entering and leaving the site on to Whichers Gate Road. There was considerable confusion about the highway access. Many residents, including the local Councillors, [REDACTED] didn't appreciate that the access on to the site had been implemented by the construction of the agricultural access. They referred to the appeal decision in 2012 that was dismissed on grounds that included highway access in respect to the proposal for a Garden Centre. The appellants believed that the Inspector was misguided and had erred in law. A complaint was sent to the Planning Inspectorate.
- 6.4 The appellants decided that the preferable way to resolve the matter of the access was to submit a planning application for the highway access to serve the farmland. The plans were identical to the ones examined at the appeal and had the support of the Highway Authority. The application proposed a:-
- New agricultural access from Whichers Gate Road to Mays Coppice Farm PO9 5NE (Ref:- 30661/025)**
- 6.5 Planning permission was granted November 2014, and the scheme was implemented in 2015. This meets the standards to provide access for a housing development of more than 100 dwellings. It is only necessary to examine any off-site accessibility issues. These are currently being examined by the highway consultants.
- 6.6 There was concern about the impact of the additional traffic on an existing congested road and the dangers of accidents at Comley Bridge
- 6.7 The scheme that was displayed indicated on the Boards that there were 28 people with local connections seeking affordable homes in Rowlands Castle. Many respondents were opposed to any provision for affordable homes on the basis that there was enough already.
- 6.8 It was noted that there was only one private house in the farm area other than the two properties owned by the landowners. This private house is situated in the eastern edge of the site and there was no housing development close to it.
- 6.9 There was some opposition to self and custom build housing, but this was typically as part of the case against any development rather than this concept. It was noted on the Boards that at least sixty people were on the Council's Self Build Register seeking plots.

- 6.10 Concerns were raised that the schools were at capacity and that GPs Surgeries would not cope. The display boards provided details of the issues that had been resolved such as flooding with sustainable drainage ponds in the southeast corner of the site. Ecological issues had also been addressed.
- 6.11 The Exhibition was brought to the attention of local residents by the delivery of flyers to residents in Rowlands Castle. The flyers were delivered by a local specialist company that was familiar with the Parish. There were a few complaints that some households were missed. It was intended that flyers were delivered to every household in the Parish. Local Parish Councillors were advised of the Exhibition and the Parish Clerk agreed to send the flyers to local groups.

## **7.0 CONCLUSION**

- 7.1 The Local Plan has confirmed that Rowlands Castle is a Tier 3 Settlement with a good range of services and facilities. Rowlands Castle is a settlement that offers a 'range of facilities and services'. It is a Tier 3 settlement.
- 7.2 The village is the only settlement in the Southern Parishes of the District with a railway station. The line offers services to and from major centres in the southeast of England including London. Its use should be encouraged.
- 7.3 The direction of growth of the village to the south is the only rational choice given other directions to the north, west and east are constrained. The site at Mays Coppice Farm is the only unconstrained land close to the village and to the local facilities and services.
- 7.4 It is proposed to use The Drift to gain access to the village centre. This means that the residents at Mays Coppice Farm are within walking and cycling distance of the village centre. The Neighbourhood Plan has identified the vitality and viability of the village centre as a fundamental objective. It is evident that Mays Coppice Farm is better placed than the sites at Oaklands House and Little Park Farm to meet this objective.
- 7.5 We are expecting to reach agreement on collaboration with adjacent landowners to the north to use The Drift. They will offer passage through their land in return for vehicular access to Whichers Gate Road.
- 7.6 The access onto Whichers Gate Road already exists and it has been implemented to the required standards of visibility splays. Highway consultants have been instructed to examine the highway issues including the provision of pedestrian access to the Primary School and the shop at the Shell Garage on Whichers Gate Road.
- 7.7 The relocation of the 30mph speed limit further south would also make the road safer. Local residents have campaigned for the 30mph sign to be moved further south. Ideally they would like it to be south of Comley Bridge. This

would ensure that the access on to Whichers Gate Road from the site would then be within a 30mph zone.

- 7.8 The landscape consultant has assessed the site and concluded that the existing woodland framework limits views of the site. It has been shown that there are no views of the site from the National Park. It is evident that the site can accommodate development. Strategic and sympathetic planting can enhance the position. This will also assist in addressing nutrient neutrality and ensure that there is biodiversity net gain as required Natural England.
- 7.9 The landscape consultant has identified the areas of land on the site where housing can be developed within the woodland framework. It is estimated that these areas could accommodate approximately 125 dwellings.
- 7.10 There is a considerable local demand for self and custom build housing. According to the East Hampshire Council's Register 45 people are seeking plots in Rowlands Castle Parish. However, the demand for plots is very great and most people are not aware of the need to Register their interest. It is considered that the figure of 45 underrepresents the true demand.
- 7.11 The SHLAA dated 2023 also stated that the site was 'developable' which means that the decision not to allocate the site was marginal. This is regarded as particularly relevant because we question the decision to give priority to allocate the site at Little Park Farm without a comprehensive examination of the comparative merits of the two sites.
- 7.12 The Consultation Plan has allocated four sites in Rowlands Castle Parish, and it is considered that the site at Mays Coppice Farm has greater merits than the site at Little Leigh Farm.
- 7.13 The allocation of the site at Mays Coppice Farm could make a significant contribution to the housing requirement in the Southern Parishes. The site has no significant constraints and it could be delivered immediately.



# ROWLANDS CASTLE

## WIDER CONCEPT PLAN



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**LEGEND**

- 1 SITE BOUNDARY
- 2 EXTENT OF LAND WITHIN SAME OWNERSHIP AS THE SITE
- 3 LAND PROMOTED BY OTHERS
- 4 EXISTING WOODLAND / TREE BELTS / HEDGEROWS
- 5 ROAD CORRIDORS
- 6 LONG DISTANCE WALKS
- FOOTPATH
- BRIDLEWAY
- ANCIENT WOODLAND
- CONTOURS
- TRAIN LINE
- STAUNTON COUNTRY PARK
- SOUTH DOWNS NATIONAL PARK BOUNDARY
- PROPOSED FOOTPATH LINK UTILISING EXISTING GAPS IN VEGETATION AND CONNECTING TO THE DRIFT TO THE NORTHWEST AND THE WIDER VILLAGE BEYOND
- PROPOSED LINEAR WOODLAND / TREE PLANTING
- PROPOSED SENSITIVELY LOCATED DEVELOPMENT PARCEL
- PROPOSED HEDGE
- VIEWS TOWARDS THE SITE FROM THE SOUTH DOWNS NATIONAL PARK
- INDICATIVE SITE ACCESS LOCATIONS (SUBJECT TO ARBORICULTURE AND TRANSPORT ADVICE)
- PERTINENT VIEWS IDENTIFIED IN THE ROWLANDS CASTLE PARISH NEIGHBOURHOOD DEVELOPMENT PLAN
- 1 RETENTION OF THE LINEAR COPPICE WITHIN THE SITE, CLASSIFIED AS A LOCAL GREEN SPACE. TO BE EXTENDED SOUTHEASTWARDS ALONG WHICHERS GATE ROAD TO CONTINUE THE TREENE CHARACTER AND TRUNCATE POTENTIAL VIEWS OF THE DEVELOPMENT FROM PROSPECT LANE AND FILTER VIEWS FROM WHICHERS GATE ROAD.
- 2 RETENTION OF THE AGRARIAN CHARACTER OF THE EASTERN FIELD PARCEL; OR FIELD TO BE USED FOR RE-WILDING / BIODIVERSITY NET GAIN ENHANCEMENTS, WITH DRAINAGE FEATURES INCORPORATED SENSITIVELY AS REQUIRED.
- 3A PUBLIC OPEN SPACE, PLAY AND BIODIVERSITY NET GAIN PROPOSALS TO BE INTEGRATED INTO THE NORTHERNMOST SECTION OF THE MIDDLE OF THE SITE, RETAINING VIEWS OUT TO THE SDNP AND RETAINING THE GREEN OUTLOOK FOR MAYS COPPICE FARMSTEAD.
- 3B SUITABLE LOCATION FOR ALLOTMENTS AS PART OF THE PUBLIC OPEN SPACE STRATEGY, IN THE NORTHERNMOST SECTION OF THE MIDDLE OF THE SITE, RETAINING VIEWS OUT TO THE SDNP AND RETAINING A GREEN OUTLOOK FOR MAYS COPPICE FARMSTEAD.
- 4 DEVELOPMENT PARCEL ON THE LOWER SLOPES IN THE MIDDLE OF THE SITE.
- 5 DEVELOPMENT PARCEL IN THE WEST OF THE SITE. SET WITHIN EXISTING MATURE AND SUPPLEMENTED GREEN INFRASTRUCTURE FRAMEWORK.
- 6 PROPOSED OFF-SITE LINEAR WOODLAND PLANTING TO SUPPLEMENT THE TREENE SKYLINE, AS CHARACTERISTIC OF THE LOCAL LANDSCAPE AND TO TRUNCATE POTENTIAL VIEWS OF THE DEVELOPMENT.

FIGURE 5.0 – DEVELOPMENT CONSIDERATIONS (FABRIK, 2023)

**East Hampshire Local Plan  
Draft Local Plan 2021-40  
REPRESENTATION**

**Prepared on behalf of  
BEWLEY HOMES, CALA HOMES (THAMES) AND  
BARGATE HOMES**

**6<sup>th</sup> March 2024**

**BLACKBOXPLANNING.CO.UK**



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## 1 Introduction

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- 1.1 These Representations to the East Hampshire Draft Local Plan public consultation (January 2024) have been prepared by Black Box Planning on behalf of Bewley Homes ('Bewley'), CALA Homes (Thames) ('CALA') and Bargate Homes ('Bargate'), henceforth referred to in these Representations as the South Medstead Group (SMG). The SMG is promoting development at Four Marks & South Medstead. Following the Large Development Site Regulation 18 Consultation (September 2019) the SMG was invited by the Local Planning Authority to work collaboratively and continues to do so. Accordingly, these Representations have regard to the SMG's land interests at South Medstead. A site location plan is included at Appendix 1.
- 1.2 These Representations include the following Appendices:
- Appendix 1: Site Location Plan of land at Four Marks & South Medstead
  - Appendix 2: Placemaking Vision for land at Four Marks & South Medstead (prepared by Boyer Planning)
  - Appendix 3: Transport Technical Note (prepared by i-Transport and Pegasus)
  - Appendix 4: ZTV Landscape Sensitivity Analysis (prepared by the Peter Richards Partnership)
- 1.3 The work undertaken to date and continued commitment to bringing forward a holistic approach to development at Four Marks & South Medstead, by three experienced developers, supports the deliverability of the scheme.
- 1.4 The masterplanned proposal for development at Four Marks & South Medstead covers an area of approximately 53ha and comprises a mixed-use scheme which will deliver:
- Up to 1,100 new homes;
  - A 2-form entry primary school;
  - A regenerated and enlarged Local Centre at Lymington Barns;
  - An Employment Hub; and
  - Significant new green infrastructure, supporting a health and well being focused development.
- 1.5 A strategic approach to new development provides the opportunity to nucleate the settlement, providing a major uplift in new social and economic infrastructure and provide a range of benefits for both new and existing residents in a genuinely walkable neighbourhood. A copy of the Placemaking Vision for the site is attached at Appendix 2, setting out how this will be achieved in practice.
- 1.6 The site is relatively free from constraint in planning terms, which is supported by the Council's own evidence base. The developers have engaged with the Local Plan process over an extended period of time, but yet the site is not considered by the Council as a consolidated proposal in the assessment of potential options, and is instead assessed as two separate parcels. This is surprising given the SMG's promotion of the site as a single consolidated site,

and its consideration as such through previous iterations of the draft Local Plan evidence base, such as the AECOM Interim SA Report of Strategic Site Options (2021).

- 1.7 It is recognised that the Local Plan is at Regulation 18 stage, and therefore at a relatively early stage in the plan making progress. These Representations identify a number of areas of concern and recommendations for modifications, assisting the robustness of the Plan moving forward to Regulation 19 stage and applying the tests of soundness<sup>1</sup>.
- 1.8 The presentation of a full Draft Plan at Regulation 18 stage is welcomed to enable detailed investigations of the District's proposed approach to meeting its housing, employment and other needs.
- 1.9 The overriding objective of the emerging Local Plan must be on providing a sound spatial strategy whilst delivering the area's objectively assessed housing need. It is welcomed that the Local Planning Authority (LPA) are proposing to meet their housing needs in full, recognising the challenges which exist with inclusion of part of the South Downs National Park (SDNP) within the District. It is also welcomed that the LPA recognise there is potential to meet unmet need from neighbouring authorities. However, the quantum of unmet need, particularly from the SDNP portion of the District, is of concern.
- 1.10 These Representations make comment on a number of issues, including:
  - Section 2: Housing Need and Housing Requirements
  - Section 3: Settlement Hierarchy and Site Accessibility
  - Section 4: The Integrated Impact Assessment
  - Section 5: Recommendations
- 1.11 Therefore, these representations address the issues and options with specific regards to the SMG's interest at Four Marks & South Medstead.

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<sup>1</sup> NPPF paragraph 35

## 2 Housing Need and Housing Requirements

- 2.1 The Local Plan proposes to use a housing need calculated through reference to the Standard Method.
- 2.2 In terms of the overall requirement for East Hampshire<sup>2</sup> (i.e. including the area of East Hampshire which forms part of the South Downs National Park ('SDNP')), this equates to an annual need of 578 dwellings per annum ('dpa'), equating to a minimum of 10,982 homes across the plan period 2021-40, based on the 2023 Standard Method.
- 2.3 The National Planning Policy Framework (December 2023) sets out that the use of the standard method provides a starting point for establishing a housing requirement for the area, and notes that there may be exceptional circumstances that justify the use of an alternative method.
- 2.4 The Local Plan evidence base includes an appraisal of the use of the standard method within East Hampshire (Iceni, 2023). With reference to the requirement for the use of the standard method for the East Hampshire, it concludes that there are no 'exceptional circumstances' that would point to housing need being lower than the Standard Method.
- 2.5 SMG concur that there are no exceptional circumstances to justify an alternative to the standard method for calculating the minimum housing requirement for East Hampshire. Such an approach is in accordance with national policy and is supported.
- 2.6 However, the Local Plan then seeks to disaggregate the 578dpa figure between East Hampshire District Council ('EHDC') and the areas of the South Downs National Park Authority ('SDNPA') which fall within East Hampshire.
- 2.7 It is accepted EHDC is an authority where the strategic policy-making authority boundary does not align with the local authority boundary. It is appropriate therefore for the District Council to consider the housing need for EHDC excluding the area covered by the SDNP through an alternative method as part of the Plan Making process.
- 2.8 Planning Practice Guidance sets out that any alternative method must consider the best available information on anticipated changes in households as well as local affordability levels. In any event, the requirements for a plan that meets the four tests of soundness, is a fundamental element of Plan Making and is applicable to any methodology pursued by EHDC in disaggregating their need from that of the SDNPA.
- 2.9 The Local Plan disaggregates a figure of 478<sup>3</sup> dpa to be met within the EHDC administrative area (excluding the SDNP). The Local Plan notes that this figure is based on past delivery and historic agreement with the SDNPA' (South Downs National Park Authority), and is based on *'the delivery of 100 homes per annum within the part of East Hampshire that falls within the National Park'*.
- 2.10 As part of the Plan Making process, EHDC have agreed a Statement of Common Ground (SoCG) with the South Downs National Park (January 2024).

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<sup>2</sup> References within this section to 'East Hampshire' relate to the administrative area as a whole (i.e. including the SDNP). References to East Hampshire District Council, EHDC, or 'the District Council' should be read as excluding the SDNP.

<sup>3</sup> This figure includes a small provision EHDC consider meets an unmet need from SDNP.

2.11 The SoCG sets out that:

*The SDNPA is currently at the very early, evidence gathering stage of its Local Plan Review (LPR) process. The SDNPA is working towards a draft plan which is anticipated for a Regulation 18 consultation in early 2025. As a result, the SDNPA is currently unable to confirm how much of the identified housing need could be met within the East Hampshire Area of the National Park. Moreover, EHDC and the SDNPA will continue, through existing Duty to Cooperate (DtC) arrangements, to work together to consider whether and how any identified unmet needs can be met.*

2.12 It is noted that the SoCG post dates the preparation of the South Downs National Park Housing & Economic Development Needs Assessment (November 2023) ('HEDNA'). Given the above statement, assessments of housing need within the SDNP HEDNA are, in terms of any 'contribution' the SDNPA may make to East Hampshire, not afforded weight as part of the Plan Making process at the current time.

2.13 The SMG concur that the South Downs National Park Emerging Local Plan is at a very early stage and is therefore at the current time of little assistance to the EHDC Emerging Plan. It is relevant therefore to consider the existing Duty to Co-operate (DtC) agreements relating to housing delivery between EHDC and SDNP in line with the above statement.

2.14 The most recent DtC agreement between EHDC and SDNPA related to housing delivery is understood to date from March 2021<sup>4</sup>, and notes:

*Only 25 dpa are expected in the National Park within East Hampshire from 2027 to 2036... It is acknowledged that there will be future housing delivery within the National Park beyond those figures established in the housing trajectories... however, any quantum is currently unknown. The location of this housing is unlikely to be determined until a review of the South Downs Local Plan and any relevant Neighbourhood Development Plans.*

2.15 This rate of delivery is not reflected within the delivery forecast of 100dpa put forward by EHDC as part of the Local Plan process. It is clear therefore that contribution of the SDNP to East Hampshire in terms of housing delivery is in decline over the proposed plan period. This has not been reflected in the proposed 100dpa contribution set out by EHDC. Any quantum of contribution from the SDNPA above 25dpa from 2027 is, as set out in the March 2021 DtC agreement, 'unknown'. There is no evidence to support it.

2.16 In addition, the adopted South Downs Local Plan only sets out delivery policies until 2036, and published monitoring reports by the SDNPA extend to 2033. It is considered therefore that, in the absence of other evidence, the contribution of the SDNPA to East Hampshire's housing need during the period 2027-2036 should be 25dpa and from 2037-41 should be considered to be zero.

2.17 In any event, despite this low rate of delivery, housing figures for the area of East Hampshire within the SDNP are heavily dependent on delivery within the settlement of Petersfield. The viability or rate of such delivery has yet to be tested through the SDNP Emerging Plan process, and it is considered therefore that such heavy reliance on a single settlement for delivery within East Hampshire (and associated contribution therefore of the SDNPA to the housing need of

<sup>4</sup> Statement of Common Ground Housing and Traveller Accommodation Needs in East Hampshire

East Hampshire) cannot be relied upon at the current time until tested through the Plan Making process.

- 2.18 Given the above therefore, the figure of 100 homes per annum to be delivered within the SDNPA is at risk of being considered unsound at examination, and risks the Plan being found to be not positively prepared, effective, justified, nor consistent with national policy. The SMG do not consider that the figure of 478dpa is supported by a robust evidence base, nor is it considered to be supported by effective joint working with adjoining authorities. The figure of 478dpa for EHDC cannot, therefore, be considered to meet the areas housing need nor be deliverable over the plan period. A higher figure is required, which more realistically reflects delivery in the SDNP.

### 3 Settlement Hierarchy and Site Accessibility

- 3.1 The Draft Local Plan sets out, at Policy S2, a proposed Settlement Hierarchy, which establishes five tiers of settlement to which development may be directed. Four Marks & South Medstead<sup>5</sup>, is included in Tier 3, which also includes the following proposed settlements:

*Tier 3: Bentley, Clanfield, Grayshott, Headley, Holt Pound, Rowlands Castle*

- 3.2 Supporting text to Policy S2 identifies that each tier will contribute towards growth in the Local Plan Area, with the largest level of growth expected in higher order settlements (Tier 1 & 2) due to their greater access to public transport, services and amenities.
- 3.3 Supporting text to Policy S2 additionally identifies that 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.
- 3.4 As a general approach, the identification of a settlement hierarchy as part of the Plan Making process is an appropriate response to NPPF requirements for Local Plans to establish a framework for meeting housing needs and set an overall strategy as to the pattern and scale of development, and in terms of supporting the strategic priorities of the area.
- 3.5 Nevertheless, any settlement hierarchy should be reflective the government's objective for plan making such that Local Plans contribute to achieving sustainable development, and are based on proportionate evidence supportive of an overall strategy.
- 3.6 As part of the Regulation 18 consultation, EHDC have published the Revised Settlement Hierarchy Background Paper (January 2024) ('the Background Paper') which provides additional detail as to the methodological approach taken to establish the evidence base which has led to the settlement hierarchy set out in Policy S2. In particular, this references the preparation of the Accessibility Study (Ridge and Partners, 2023) ('the Accessibility Study') as a supporting evidence base and sets out how the evidence from the accessibility study has been applied in the preparation of Local Plan Policy.
- 3.7 The SMG raise a number of significant concerns with regards detailed matters related to the methodological approach undertaken within the Accessibility Study, and consider that matters raised should be addressed and incorporated into any future iteration of the Accessibility Study. A technical note (the Technical Note) prepared by Pegasus Group & i-Transport accompanies this representation, at Appendix 3, and is summarised below.
- 3.8 Furthermore, it is considered that the application by EHDC of the outcomes of the Accessibility Study to the Local Plan would if pursued to Regulation 19 stage be unsound, and has not resulted in an appropriate strategy that will enable the delivery of sustainable development within EHDC across the Plan Period.

#### ACCESSIBILITY STUDY

- 3.9 As noted, a technical note considering the methodological approach undertaken within the Accessibility Study has been prepared and raises a number of concerns with regards the methodological approach, summarised below.

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<sup>5</sup> It is noted Policy S2 incorrectly refers to 'Four Marks' and should refer to 'Four Marks and South Medstead'

- 3.10 The Technical Note identifies a number of fundamental flaws with regards the approach undertaken within the Accessibility Study.
- 3.11 Firstly, the Accessibility Study considers distance as the only consideration of accessibility, and fails to consider the ability to achieve safe and attractive connections to facilities, which are fundamental to accessibility. Without the ability to connect to services, distance appraisal is irrelevant.
- 3.12 Secondly, the Accessibility Study undertakes no consideration of facilities and services that can be provided or improved on site or nearby as a result of strategic development opportunities. As such, it provides a false appraisal of the potential for sustainable development to be achieved under strategic development options. This is a particular flaw with regards strategic sites, such as at Four Marks & South Medstead, that offer the opportunity for the delivery of high scoring facilities (such as a new primary school) to further enhance the sustainability of particular settlements for both existing and future residents. Of course, in the case of Land at Neatham Manor Farm<sup>6</sup>, there are no existing residents so all future provision is required to mitigate (and absorb) new development, rather than looking to deliver enhancement to existing settlements and services.
- 3.13 In addition to these fundamental flaws, there are a number of methodological errors in the assessment carried out.
- 3.14 The Accessibility Study has not taken full account of the availability of *existing* services within settlements. This is particularly the case with regards proposed sites at Four Marks & South Medstead, where the provision of a number of existing services (such as café and medical services), have not been accounted for in the site scoring. This is a significant flaw in the scoring and implies that the methodological approach may not have been equitably applied across the District. Certain sites, including at Four Marks & South Medstead, appear therefore to have been underscored against the Accessibility Study's own methodology. There is concern therefore that the accessibility score for both Land West of Lymington Bottom Road (LAA/MED-026) and South Medstead (LAA/MED-027) has not been considered correctly or fairly, and should be reconsidered in light of existing service provision.
- 3.15 The Accessibility Study also does not treat opportunities and constraints for Active Travel and Public Transport equitably or fairly. Certain sites, in particular Land at Neatham Manor Farm (LAA/BIN-011), appear to have been treated positively in this regard. No detailed justification has been provided within the study as to why particular sites benefit from particular opportunities nor other sites subject to particular constraints.
- 3.16 Finally, the Technical Note raises concerns with regards the treatment of Land at Neatham Manor Farm (LAA/BIN-011) in particular. Given the poor availability of services and facilities in proximity to the site, Land at Neatham Manor Farm appears to have received higher scoring than the methodological approach justifies, which includes various facilities and services that do not meet the Study's own criteria. As set out subsequently within this Representation, this further underscores the inappropriateness of Land at Neatham Manor Farm for a strategic allocation.

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<sup>6</sup> Also referred to as Neatham Down



- 3.17 It is concluded therefore that there are a number of methodological issues with the Accessibility Study, which EHDC must address in advance of future rounds of consultation.

### SETTLEMENT HIERARCHY

- 3.18 Notwithstanding the matters of detail related to the Accessibility Study as set out above, it is considered that the Council has not followed an appropriate approach with regards the application of the Accessibility Study output to the final settlement hierarchy. Specific reference is made to the Background Paper which sets out the approach taken by EHDC in interpreting the outcomes of the Accessibility Study.
- 3.19 It is considered that any settlement hierarchy should support the delivery of sustainable development across the Plan Period, and be consistent with the objectives of the Local Plan. In this instance it is considered that the proposed settlement hierarchy does not achieve either of these outcomes. Further comment on this matter is provided below.
- 3.20 The Background Paper sets out how the results of the Accessibility Study have been applied to prepare the proposed Settlement Hierarchy in the Draft Plan. The Background Paper identifies that EHDC identified an initial settlement hierarchy based on a 'mean' settlement score. The mean sustainability score was based upon the average score of each 500m hexagon that constituted a settlement, as follows:

*Based on the Accessibility Study outcomes, an average (mean) accessibility score for each settlement was calculated from the complete set of hexagons that represent a given settlement. These average accessibility scores provide evidence to consider whether the previous settlement hierarchy ranking is still appropriate.*

- 3.21 This initial settlement hierarchy was then appraised against overall settlement population to upgrade or downgrade settlements within the hierarchy (with larger population settlements typically being upgraded in the hierarchy where their mean sustainability score would have placed them in a lower tier).
- 3.22 There are a number of concerns with regards how the output of the accessibility study has been applied in the creation of the proposed settlement hierarchy, in particular the tiering within the settlement hierarchy, the use of the 'mean' settlement score to calculate the initial settlement hierarchy, and the irrationality that such an inconsistent approach therefore results in.

### Settlement Hierarchy Tiers and Scoring

- 3.23 With regards the number of tiers proposed, it is considered that any settlement hierarchy should enable development at an appropriate scale at suitable settlements across the Plan Period. The higher tiers of the settlement hierarchy should therefore be appropriate for more strategic development, with the lower tiers more appropriate for smaller scale development.
- 3.24 This is, in principle, recognised by EHDC in the Background Paper, which notes that:

*Settlements that are in a higher tier of the hierarchy will often be more sustainable locations for new development, because new residents would be able to access a greater range of services and facilities more easily, without the need to travel large distances by car. The Council remains committed to an approach to determining a settlement hierarchy that prioritises accessibility by the most sustainable transport modes of walking and cycling in order to tackle greenhouse gas emissions*

- 3.25 In terms of the spatial distribution of EHDC, the District consists of a small number of large service centres, a moderate number of smaller service centres, a significant number of larger and smaller villages, alongside many hamlets/isolated dwellings.
- 3.26 In this context, it is considered that a four tier settlement hierarchy is appropriate in the context of EHDC, with the top two tiers (Tiers 1 & 2) considered to have the potential for more strategic scale development across the Plan Period, and the bottom two tiers (Tiers 3 & 4) appropriate for more moderate scales of development. Further consideration as to which tiers are considered appropriate for which settlements is provided below.
- 3.27 A four tier approach has previously been identified by EHDC as the preferred approach. The originally proposed six tiers of settlement hierarchy put forward in the EHDC 2019 Local Plan consultation was recognised as unwieldy, and replaced with a four tier settlement hierarchy in the 2022 Regulation 2018 consultation. In the 2022 Regulation 18 consultation EHDC themselves identified that a four tier hierarchy was 'intuitive' in the context of the District's spatial realities. As above, it is considered that a four-tier hierarchy remains the intuitive approach to guide development within EHDC across the plan period.
- 3.28 The presence of the South Downs National Park, alongside a number of nationally and internationally designated environmental sites, is an identified constraint within East Hampshire, particularly in the east and south of the District. Noting these constraints, the settlement hierarchy must identify a sufficient number of settlements within the top tiers that can be considered for strategic growth, to ensure sufficient land is available across the plan period to meet identified needs in the event housing delivery at specific higher tier settlements is undeliverable due to environmental or locational factors. This is particularly the case where certain settlements, including for example Four Marks & South Medstead, are largely unconstrained in such terms and have the capacity for strategic growth. Such an approach is consistent with the outputs of the Accessibility Study as set out below.
- 3.29 As noted above, notwithstanding any specific planning constraints related to any particular settlement, a settlement hierarchy should be used to guide appropriate levels of development to the different tiers of the settlement hierarchy. The overall potential capacity of a settlement, including the extent of overall service provision that already exists, is an important consideration in this matter.
- 3.30 This is manifestly not the case with the settlement hierarchy proposed by EHDC in the Local Plan consultation.
- 3.31 The anomalous settlement hierarchy is considered to have resulted primarily through the use by EHDC of the mean accessibility scoring to establish the initial settlement hierarchy. The proposed approach does not result in the delivery of sustainable development in accordance with the NPPF, and would be unsound if taken forward in the Local Plan as currently set out.
- 3.32 The utilisation of a 'mean' score to form the initial settlement hierarchy results in a settlement hierarchy that overpromotes small settlements without consideration of their overall sustainability or capacity for development across the plan period, and correspondingly underplays the important role of local service centres as sustainable locations for growth. Small settlements, which have a number of services within a 500m radius only, score (in relative terms) highly in the overall hierarchy. Such an approach does not pay sufficient regard to wider availability of services within a settlement, and therefore that settlement's ability to accommodate growth commensurate with its size and role in the settlement hierarchy.

- 3.33 Whilst it is recognised that as part of the process in establishing the proposed settlement hierarchy, EHDC have then subsequently considered existing population and regraded a number of settlements, this does not overcome the fact that the initial approach is neither justified nor rational, and results in a settlement hierarchy which is not based on sound principles regardless of any subsequent amendment for population size.
- 3.34 In terms of the proposed settlement hierarchy, the irrationality of utilising mean scoring to form the initial settlement hierarchy can be seen within Tier 3 proposed by EHDC in particular. Within this tier, a number of smaller settlements are placed alongside those to which they have little spatial similarity, primarily due to the mean score of that small settlement being similar to the mean score of the larger settlements. This is particularly the case when a settlement is a 'single hexagon settlement' (i.e. where a 500m radius is considered to cover the entire settlement). In such instances the reliance on mean scoring unjustifiably inflates the service offering of that smaller settlement when compared to other settlements in the same tier.
- 3.35 As previously noted, EHDC propose Tier 3 in the settlement hierarchy to be constituted of the settlements of Bentley, Clanfield, Four Marks & South Medstead, Grayshott, Headley, Holt Pound, and Rowlands Castle, with significant variation in terms of size, form and overall sustainability (as measured by the Accessibility Study)
- 3.36 Smaller settlements are appropriate for a level of growth over the plan period. However, for settlements within Tier 3, these smaller settlements are clearly incomparable with other settlements in Tier 3 such as Clanfield or Four Marks/South Medstead. Clanfield and Four Marks/South Medstead have overall sustainability scores of 151 and 125 respectively, indicating a significantly higher degree of service provision across the settlement. They both have populations of approximately 6,000 and both offer a variety of retail, employment, cultural and service opportunities within the settlement themselves. Such comments would equally be broadly equivalent to settlements such as Grayshott or Rowlands Castle. As such, it is considered appropriate that the larger settlements are appropriate to be placed in a higher tier.
- 3.37 In functional and spatial contexts, these larger settlements are as a matter of fact and degree fundamentally different to small settlements. Whilst it is not inappropriate to direct some growth towards smaller settlements, the capacity of such settlements to absorb larger scale development is clearly incomparable when placed against other settlements in the same tier such as Clanfield or Four Marks/South Medstead. Settlement hierarchies should (notwithstanding planning constraints) act to facilitate similar levels of development across the same settlement tier across the plan period. This is clearly not the case in the currently proposed settlement hierarchy. The approach taken by EHDC in this instance would not be sound.
- 3.38 The approach undertaken with regards the settlement hierarchy is considered to be inconsistent with the objectives of the Local Plan. The downplay of larger settlements is not considered to result in the provision of a suitable supply of land in sustainable locations for growth, does not encourage living locally or enhance the vitality of local centres, and does not support the timely delivery of future infrastructure.
- 3.39 The proposed settlement hierarchy is an inappropriate basis on which to progress the plan, and does not support local plan objectives as currently set out. It is relevant therefore to set out an alternative approach to the preparation of a settlement hierarchy for the East Hampshire District Local Plan.

- 3.40 As already noted, although subject to a number of methodological flaws, the Accessibility Study can contribute to the evidence base to support the preparation of settlement hierarchy as part of the Emerging Local Plan, in part.
- 3.41 It is, however, considered more appropriate to utilise the overall sustainability score ('the total score') as a starting point for establishing a proposed settlement hierarchy to guide development within the district. This score represents the sustainability for the settlement as a whole and is indicative of the extent of service provision across the settlement and the potential facilities available for residents (both current and future) within that settlement.
- 3.42 Notwithstanding the issues with the Accessibility Study already identified, there are clear clusters of settlement groupings based on the total settlement sustainability score.
- 3.43 In the context of a four tier hierarchy and the existing scoring set out in the Accessibility Study, these clusters would be:
- Tier 1: Total score >300
- Tier 2: Total score >90 and <300
- Tier 3: Total score >10 and <90
- Tier 4: Total score < 10<sup>7</sup>
- 3.44 Such an approach, incorporating assumptions taken by EHDC with regards groupings of particular settlements (e.g. Alton & Holybourne), would result in the following settlement hierarchy:

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

- 3.45 It is accepted that it may be considered appropriate to treat Headley and Headley Down as a single settlement, in which case such a settlement may be an appropriate Tier 2 settlement.

<sup>7</sup> Equally, a score of below 10 has been used by EHDC as a determinative score for the lowest tier of settlement. EHDC identify at section 5.19 of the Background Paper that settlements that score less than double the median score will be placed in the lower tier of the settlement hierarchy. Excepting Beech, all of these settlements are 'single hexagon settlements' and the mean score is, therefore, the total score. The approach taken here is broadly equivalent in this regard.

- 3.46 All other settlements not identified above would be treated as part of the open countryside.
- 3.47 Noting the above comments with regards Headley and Headley Down, a 'sense check' of settlement population sizes (in the same manner as undertaken by EHDC) suggests that settlements within each revised proposed tier have similar populations to other settlements within the same tier. It is further noted that the proposed revised hierarchy bears some significant similarity to that previously consulted on at the 2022 Regulation 18 consultation.
- 3.48 The overall approach set out above is considered to be more consistent and rational, as well as justified and supportive of sustainable development at settlements with appropriate potential capacity for growth, than the proposed approach undertaken by EHDC.
- 3.49 It is noted however, that amendments to the Accessibility Study methodology, particularly those as set out in the accompanying transport note, should be considered as part of a holistic review of the settlement hierarchy.
- 3.50 The SMG consider that the mean accessibility score of the settlement (and single hexagon scoring) may offer some opportunity to help identify particular services and facilities that could be provided through a strategic allocation to enhance a settlement's overall sustainability. Subject to further investigation this may therefore have applicability as part of consideration of services to be delivered through a strategic allocation to meet a settlement's particular needs. The application of such scoring on any proposed allocation would need to be considered on its own merits. This would support a more positive approach to the spatial strategy, forward looking and an approach that would consider how new development could enhance the provision of service and facilities within existing settlements, rather than 'bolting on' and mitigating.
- 3.51 As set out in the i-Transport/Pegasus Group Technical Note, the current approach to considering potential improvements in the existing Study is unexplained and inconsistent, as a means to inflate the credentials of Land at Neatham Manor Farm as a preferred location for development. The current approach pursued by EHDC seems fragile given the clear shortcomings.
- 3.52 It is considered therefore that the revised settlement hierarchy set out above, alongside the methodological alterations as set out within this section, would be a more appropriate starting point to support the local plan objectives to deliver sustainable housing growth to meet future needs in the right location, support economic growth and the provision of facilities and services, encourage living locally, ensure the enhancement and flexibility of local infrastructure, as well as promote sustainable development at suitable locations within the District.
- 3.53 Noting this, it is relevant therefore to now consider the Integrated Impact Assessment and associated process of specific site selection that has been undertaken as part of the draft Local Plan.

## 4 The Integrated Impact Assessment

- 4.1 The consultation draft of the Local Plan is accompanied by an Integrated Impact Assessment (IIA) prepared by Urban Edge Environmental Consulting. IIA combines Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment, incorporating the requirements of the Strategic Environmental Assessment (SEA) Regulations<sup>8</sup>.
- 4.2 A scoping exercise completed in December 2023 established a framework of objectives by which to structure the assessment. We note this scope is based on the Sustainability Appraisal scope originally established in February 2019 in support of an earlier iteration of the Local Plan. The scope was refreshed through the 2023 IIA scoping report to update the baseline information and increase the number of objectives and their assessment criteria. This expanded scope reflects the shift to an IIA from the previous Sustainability Appraisal.

### ASSESSMENT OF REASONABLE ALTERNATIVES

- 4.3 The SEA Regulations require that the IIA considers the likely significant effects on the environment of the plan itself, and of reasonable alternatives to it. The Regulations do not define what comprise reasonable alternatives, but in practice it would normally be the case that alternative growth scenarios are tested which consider the ways in which different amounts of growth and different locations for that growth might give rise to effects on the (sustainability) environment. The factors which inform these different growth scenarios will include 'top-down' considerations such as the need to avoid adverse effects on strategic receptors like European designated ecological sites, and 'bottom-up' factors like site availability.
- 4.4 Notwithstanding the discussion of housing need at Chapter 2 of these Representations, we note that the IIA assumes that the starting point in terms of housing numbers to be delivered through each of these options is a minimum of 2,857 dwellings. This is the residual housing requirement once completions, commitments and windfall assumptions are deducted from the standard method figure of 9,082 dwellings. In practice, a total of around 3,500 units are proposed for allocation. Policy H1 of the Local Plan notes that this reflects a need to account for potential unmet need from the wider South Hampshire sub-region.

### Spatial Options assessment

- 4.5 Four alternative spatial options are identified in the IIA by which to distribute this housing delivery, summarised below:
- Option 1: Disperse new development to a wider range of settlements
  - Option 2: Concentrate development in the largest settlements
  - Option 3: Distribute development in proportion to existing population levels
  - Option 4: Concentrate development in a new settlement, or large urban expansion to one or more existing settlements.
- 4.6 A summary of the spatial options assessment is presented at Chapter 5 of the IIA, with the detailed assessment of the alternatives found at Appendix E. The assessment identifies Option 2 as the most strongly performing alternative, i.e. focussing growth at the largest settlements.

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<sup>8</sup>The Environmental Assessment of Plans and Programmes Regulations 2004, as per <https://www.legislation.gov.uk/ukSI/2004/1633/contents/made>

4.7 Notwithstanding this, the preferred growth scenario would include 1,000 units at a single strategic allocation at Land at Neatham Manor Farm, east of the A31. No other strategic site allocations are proposed, and growth at non-strategic sites would be distributed across the settlement hierarchy as follows:

- Tier 1: 700 units (excluding Land at Neatham Manor Farm)
- Tier 2: 1,100 units
- Tier 3: 600 units
- Tiers 4 & 5: 100 units

4.8 We have a number of concerns with assessment of alternative spatial options. First, it is clear that although Option 2 was assessed as performing most strongly, the preferred strategy is more closely aligned with the spatial principles of Option 4, on the basis that it includes a strategic site outside an existing settlement at Land at Neatham Manor Farm. This is significant because Option 4 scores poorly relative to Option 2. The relative assessments of Options 2 and 4 are presented below to illustrate the differences between the two.

IIA Topic	Option 2 (Preferred Option)	Option 4 (New Settlement/Urban Expansion)
Biodiversity	0	--
Climate Change Mitigation	++	+/-
Climate Change Adaptation	-	0
Accessibility	++	-
Health and Wellbeing	++	-
Economy and Employment	+	-
Built and Cultural Heritage	-	0
Housing	+	++
Landscape	0	-
Natural Resources	-	--
Water Resource Management	-	-
Air, noise and light pollution	-	+/-



- 4.9 Option 2 is characterised by most growth being concentrated at the largest settlements. However, by directing a very significant amount of growth – nearly 30% of the entire plan – outside of Alton to Neatham Manor Farm the draft Local Plan departs from the strongest spatial option and is therefore in tension with the findings of the spatial options assessment. For the purpose of the spatial options assessment, it is significant that Neatham Manor Farm does not present as part of the settlement of Alton in either functional or character terms, as evidenced by the Zone of Theoretical Visibility (ZTV) landscape analysis at Appendix 4 of these Representations. The site cannot feasibly be considered as concentrating development at Alton when it evidentially lies beyond the settlement of Alton.
- 4.10 Notwithstanding this, it is clear that the assumptions which underpin the Option 4 assessment in any case require refining through further appropriately scaled assessment. For example, the assessment of Option 4 concludes that adverse landscape effects are anticipated irrespective of the location of a new settlement, yet it simultaneously recognises there is a variation in landscape sensitivity and capacity across the district, stating that “greater landscape capacity to accommodate development in the North West area, particularly around Four Marks” (see Appendix E of the IIA). Evidentially, the potential effects on landscape from a strategic site/new settlement would fall across a broad spectrum depending on location, but without a strategic site assessment the IIA fails to account for this. As such, we have no confidence in the findings of the spatial options assessment. By selecting a preferred strategy which is in conflict with the findings of the spatial options assessment the Council fails to be led by the evidence, and this undermines the soundness of the draft Local Plan as a whole.

### **The need for a Strategic Site Options assessment**

- 4.11 We believe this highlights a significant shortcoming in the IIA – the absence of a ‘middle layer’ assessment of strategic site options against the IIA framework of objectives. This is essential to fully understand the performance of any spatial option which includes a strategic site. Indeed, we consider that Option 4 has good potential to perform most strongly in the IIA, but only if a suitable strategic site is selected. Whilst we recognise that it is for the Council to determine what constitutes a reasonable alternative, the Council’s own evidence base identifies potential alternative strategic sites, and a number of these have performed strongly in previous rounds of Local Plan making<sup>9</sup>. Many of these remain actively promoted through the Local Plan process, including land at Four Marks & South Medstead. Given this previous evidence base work exists, it would be irrational to now ignore it. The risk is of a perception arising that alternative strategic sites are no longer being tested through the IIA because the findings would not suit the Council’s desired outcome.
- 4.12 The Council’s previous preferred approach to spatial strategy development was to include a strategic site/new settlement option in its wider menu of spatial options, and then to undertake a focussed assessment of alternative strategic sites to feed into this (see for example, the Strategic Site Options Interim SA [AECOM, 2021])<sup>10</sup>. No evidence is now presented to support a departure from this approach, which is significant given the Council’s preferred spatial strategy relies upon allocation of a strategic site. It is not sufficient to simply test sites in isolation through Appendix G of the IIA as this is not a focussed assessment of the relative merits of the alternatives to Neatham Manor Farm – in other words, the Council appears to

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<sup>9</sup> E.g. the Large Development Sites Background Paper (2019), and the AECOM Interim Sustainability Appraisal of Strategic Site Options (2021)

<sup>10</sup> <https://www.easthants.gov.uk/media/6320/download?inline>



have pre-selected Neatham Manor Farm as its strategic site. Therefore, without a meaningful relative merits assessment of strategic site options against the IIA framework it is not possible to conclude that Neatham Manor Farm is the most sustainable site for strategic growth.

### Site specific assessment of Neatham Manor Farm

#### *Landscape*

- 4.13 The proposed site at Neatham Manor Farm has a number of key weaknesses not reflected in the IIA, both in absolute terms and relative to the alternative options. For example, landscape sensitivity and the setting of the SDNP. The 2020 Large Development Sites Landscape Value Statement prepared by Terra Firma tested the site when it was proposed for only around 600 dwellings within a smaller red line boundary<sup>11</sup>. This piece of work highlighted the site's "strong relationship and continuity with the countryside to the east" and the "attractive views from the footpath along the site boundary which evoke connections with the nearby SDNP". By contrast, the same document finds that our clients' land at West of Lymington Bottom Road and at South Medstead are outside the SDNP setting and are not of high landscape value.
- 4.14 This is consistent with the findings of the 2018 Landscape Capacity Study (LCS)<sup>12</sup>, which locates Neatham Manor Farm within the setting of the SDNP. The study, also prepared by Terra Firma, takes the approach of dividing the Local Plan area into small assessment parcels, termed 'local areas' in the assessment. The entire Neatham Manor Farm site falls within local area 6C.1 which the assessment concludes "has a low capacity, constrained by its strong rural character and its role as part of ... the setting of SDNP". This again contrasts unfavourably with the land promoted by the SMG at Four Marks & South Medstead, which is found to fall within an area of medium capacity – in the context of the Local Plan area, this is one the very least constrained parcels.
- 4.15 The evidence base again highlights the need for a full relative merits assessment of strategic site options through the IIA. For example, whilst landscape capacity is constrained in many places in East Hampshire, what is apparent from the LCS is that other locations of lower sensitivity have strategic-scale land identified as suitable in the SHLAA. Similarly, the assessment of the site through the 2021 Strategic Site Options Interim SA (SSO SA) concluded likely significant adverse effects in relation to landscape, concluding that the site's location "east of the A31 gives it landscape and townscape sensitivity in several dimensions", whilst finding that strategic site options such as Land at Lymington Bottom Road and South Medstead returned a much stronger performance in relation to landscape, and a stronger performance overall.
- 4.16 In light of the above, it is important to note that Paragraph 182 of the NPPF requires that development within the setting of National Parks "should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas". By expanding the required yield from the previously-tested 600 dwellings to 1,000 dwellings the proposed allocation is brought into direct conflict with Paragraph 182 of the NPPF. Far from minimising or avoiding adverse impacts, the expanded site will serve only to deepen the adverse effects that are previously identified throughout the Council's own evidence base. In our view, this conflict with NPPF 182 goes to the heart of soundness.

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<sup>11</sup> <https://www.easthants.gov.uk/media/5939/download?inline>

<sup>12</sup> <https://www.easthants.gov.uk/media/5093/download?inline>

### **Accessibility**

- 4.17 It is also apparent that Neatham Manor Farm's overall IIA assessment score is heavily influenced by the findings of the Ridge Accessibility Study. For the reasons given at Chapter 3 of these representations, we consider the Ridge study to be flawed. Specifically at Neatham Manor Farm, the Ridge study comprehensively fails to recognise the constraints of the site as a location at which to deliver new walking and cycling links. In our view, there is no capacity at the A31/Montecchio Way roundabout to deliver the mooted walking and cycling links, and the existing farm track is unsuitable to serve as the only pedestrian link to Alton for a strategic scale scheme of 1,000 units. We believe Neatham Manor Farm's IIA score should be adjusted to reflect its poor accessibility by modes other than the car. Once the scoring is adjusted the site's performance reduces such that it is not consistent with the preferred spatial strategy. The allocation appears wholly reliant on the deliverability of these links, irrespective of their effectiveness, but there cannot be any certainty that they are achievable in practice or from a viability perspective. The IIA fails to recognise this and fails to assess the site appropriately as a result.
- 4.18 Again, we believe strategic scale land under the control of our clients at Four Marks & South Medstead performs very strongly in respect of accessibility, as it would support access to a wide range of services and facilities by sustainable modes of travel. A strategic site at Four Marks & South Medstead would also have the significant extra benefit of delivering services to meet a wider existing need within the village in respect of primary school provision, employment provision and a new pub, rather than simply meeting the needs of its new residents in isolation. Therefore, as a final point further highlighting the shortcomings of the IIA assessment of reasonable alternatives, we are concerned that the IIA fails to test the SMG site at Four Marks & South Medstead as a single comprehensive strategic site option, in spite of being promoted as such. This serves to undermine and minimise the extent of the benefits that would be realised through comprehensive masterplanning of the land either side of Lymington Bottom Road, and is inconsistent with the Council's own assessment approach through its previous Regulation 18 Local Plan drafts, including the AECOM assessment of Strategic Site Options in 2021 which assessed the site as 'South Medstead and West of Lymington Bottom Road'. Whilst we recognise that plan making has moved on since 2021, the key principles of the previous strategic sites evidence work remains a relevant reference point. We would again highlight that whilst the Council is entitled to determine what constitutes a reasonable alternative, the fact remains that it has already identified alternative strategic site options through previous evidence base work – these cannot simply now be ignored because they are no longer convenient.

### **OTHER MATTERS**

- 4.19 It is clear from site allocation policy ALT8 (Land at Neatham Manor Farm, Alton) that "a detailed LVIA would need to be undertaken to understand which areas could be developed, but landscape studies that have already been undertaken by the site promoter support the potential for development in western areas". This indicates that there is not yet clear evidence of the developable area of the site, and consequently there can be no certainty of its capacity. Certainly it is the case that there is no evidence that 1,000 units can be delivered. More evidence is therefore required, though we would note that having undertaken a ZTV analysis of the site in its landscape context the sensitivity of the site is such that its capacity is substantially lower (see Appendix 4 of these Representations). In view of the above, it is apparent that the allocation of Neatham Manor Farm is proposed prematurely, in advance of

evidence to demonstrate that impacts would be acceptable. As such the plan is leading the evidence and is not sufficiently justified.

- 4.20 Additionally, should the Local Plan be adopted with Land at Neatham Manor Farm included, this would create a divisive policy environment in the local area because the site also sits beyond the Neighbourhood Plan area, the local administrative area for the purposes of CIL and infrastructure delivery. Accordingly, it will be considered in isolation well into the future and not, in practice, part of Alton.

#### **CONCLUSION ON THE IIA**

- 4.21 Overall, we consider the Council's proposed allocation of Land at Neatham Manor Farm to be inconsistent with its selection of Option 2 as its preferred spatial option. The Council's own evidence base is clear that Neatham Manor Farm is inconsistent with the guiding principle of Option 2 which seeks to concentrate development at the existing settlements. By contrast, Neatham Manor Farm is both spatially and functionally outside the settlement of Alton, and as such is better aligned with Option 4, to which the IIA attributes a weak performance.
- 4.22 For the reasons given, we believe that this does not reflect an inherent flaw in delivering significant growth at a strategic site, but rather it reflects the failure of the IIA to test alternative strategic sites through a 'middle layer' of assessment. We believe the constraints of East Hampshire suggest that a strategic site in a sustainable location would be an appropriate strategy for the distribution of growth. However, it is clear that Land at Neatham Manor Farm is not the appropriate site to achieve this. We believe that a strategic site at Four Marks & South Medstead would be well aligned with the objectives of the Local Plan and the IIA framework, but the failure of the IIA to undertake a relative merits assessment of strategic site options means that Council has failed to properly consider stronger alternatives to Land at Neatham Manor Farm.
- 4.23 Therefore, for the reasons given we do not support the methodology, assessment scale or findings of the IIA, and consider the draft Local Plan fails to reflect the evidence and consequently fails its legal duty via the test of soundness.

## 5 Recommendations

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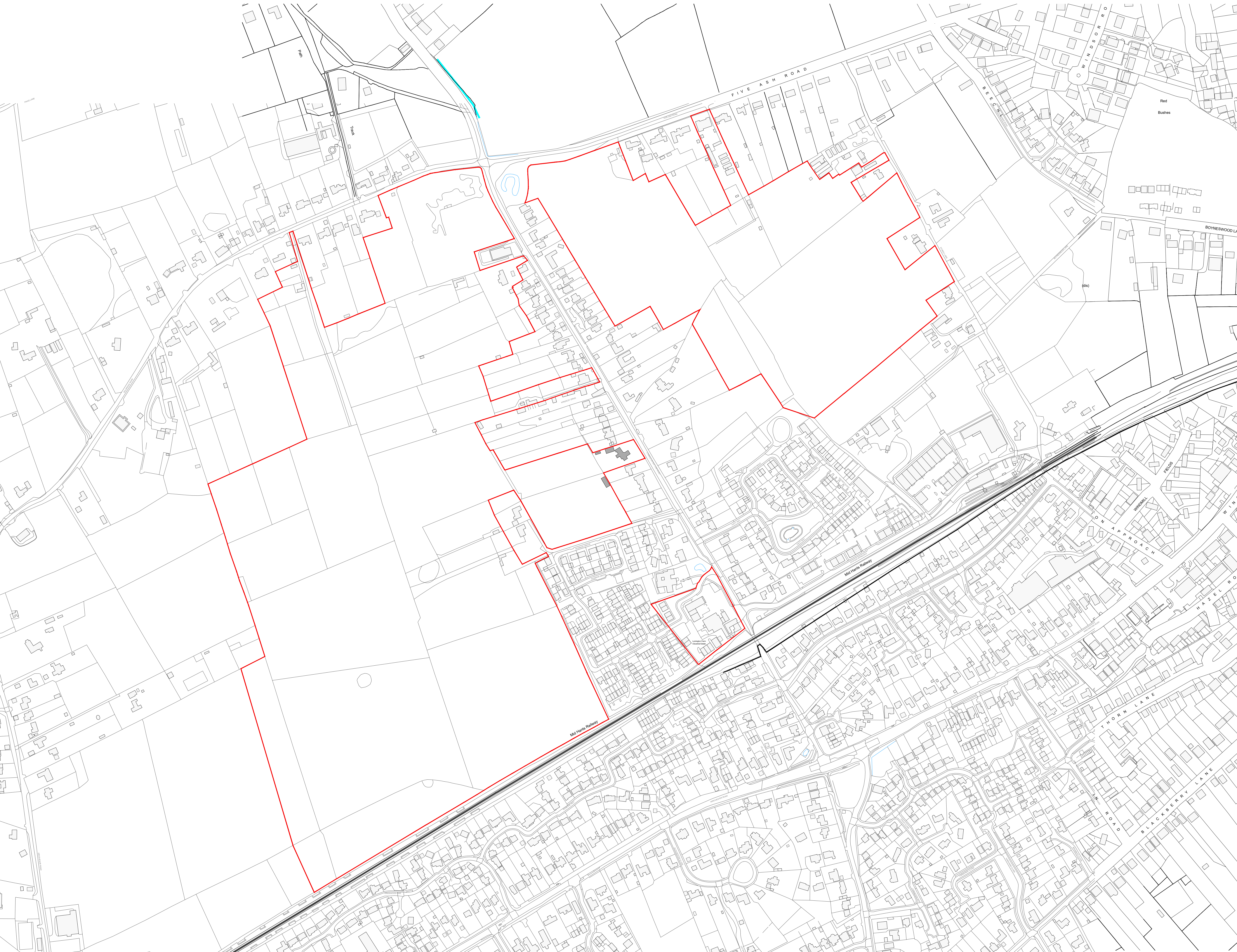
- 5.1 The SMG have sought to engage with the Local Plan Consultation in a positive manner. Whilst criticisms have been raised, these are done so to be of assistance in making the Local Plan robust through to subsequent consultation, submission and examination.
- 5.2 Currently, it is not considered that the Local Plan as set out would be sound moving forward. However, a number of recommendations, set out below, would assist in achieving this.
- 5.3 The disaggregated annual housing supply from the SDNPA must be robustly evidenced and justified. At the current time it is considered that the Local Plan significantly overestimates supply from the SDNPA over the plan period and therefore does not deliver sufficient housing within EHDC to meet the areas objectively assessed need, and therefore a higher annual requirement for EHDC is needed.
- 5.4 Further assessment of accessibility – incorporating the methodological changes proposed to the Accessibility Study – should be undertaken, to ensure that all proposed sites are treated equitably and fairly, and to fully account for both for existing service provision and potential sustainability that could be secured through strategic allocation.
- 5.5 The proposed settlement hierarchy should be reconsidered in the manner set out, to recognise both the spatial reality of East Hampshire as well as recognising the overall sustainability of individual settlements.
- 5.6 The Integrated Impact Assessment should be supplemented by an assessment of alternative strategic site options to inform the appraisal of spatial options. The assessment scores for the spatial options should be updated accordingly.
- 5.7 The preferred spatial strategy should be consistent with the National Planning Policy Framework. There are currently some fundamental inconsistencies including, but not limited to, landscape policy, in particular NPPF Paragraph 182.
- 5.8 The Local Plan is encouraged to be aspirational and use development to bring forward new services and facilities to offer enhancement, not just to mitigate the use of existing infrastructure which is what the current strategy is conditioned to do. The delivery of a strategic proposal at Four Marks & South Medstead provides a clear example of where this is possible. It would be a deliverable approach, supported by experienced developers (not promoters), delivering a mixed use solution which is justified, effective and consistent with national policy.
- 5.9 The next iteration of the Local Plan must follow an objective evidence base. It cannot pick and choose from historic evidence base documents to suit the preferred strategy of the day. The yo-yo between Settlement Hierarchies, assessment against reasonable alternatives and spatial options, is not currently justified and has the potential to bring the Local Plan process into disrepute.

## Appendix 1: Site Location Plan of land at Four Marks & South Medstead

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No.	Date	Description	Drawn	CHK'd
06/02/24		Final Issue	SK	AB

Client: Bewley Homes, CALA and Bargaat Homes

**Boyer**

Project: Watercress Meadows, Four Marks and South Medstead  
Drawing Title: Site Boundary

Drawing No: DG\_100 Job Ref: 22.2019  
Scale @ A1: 1:2500  
Scale Bar:

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## Appendix 2: Placemaking Vision for land at Four Marks & South Medstead

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# Watercress Meadows

Lymington Bottom Road

Shaping an integrated and resilient community at South Medstead

Placemaking Document | July 2023

**BEWLEY**  
HOMES

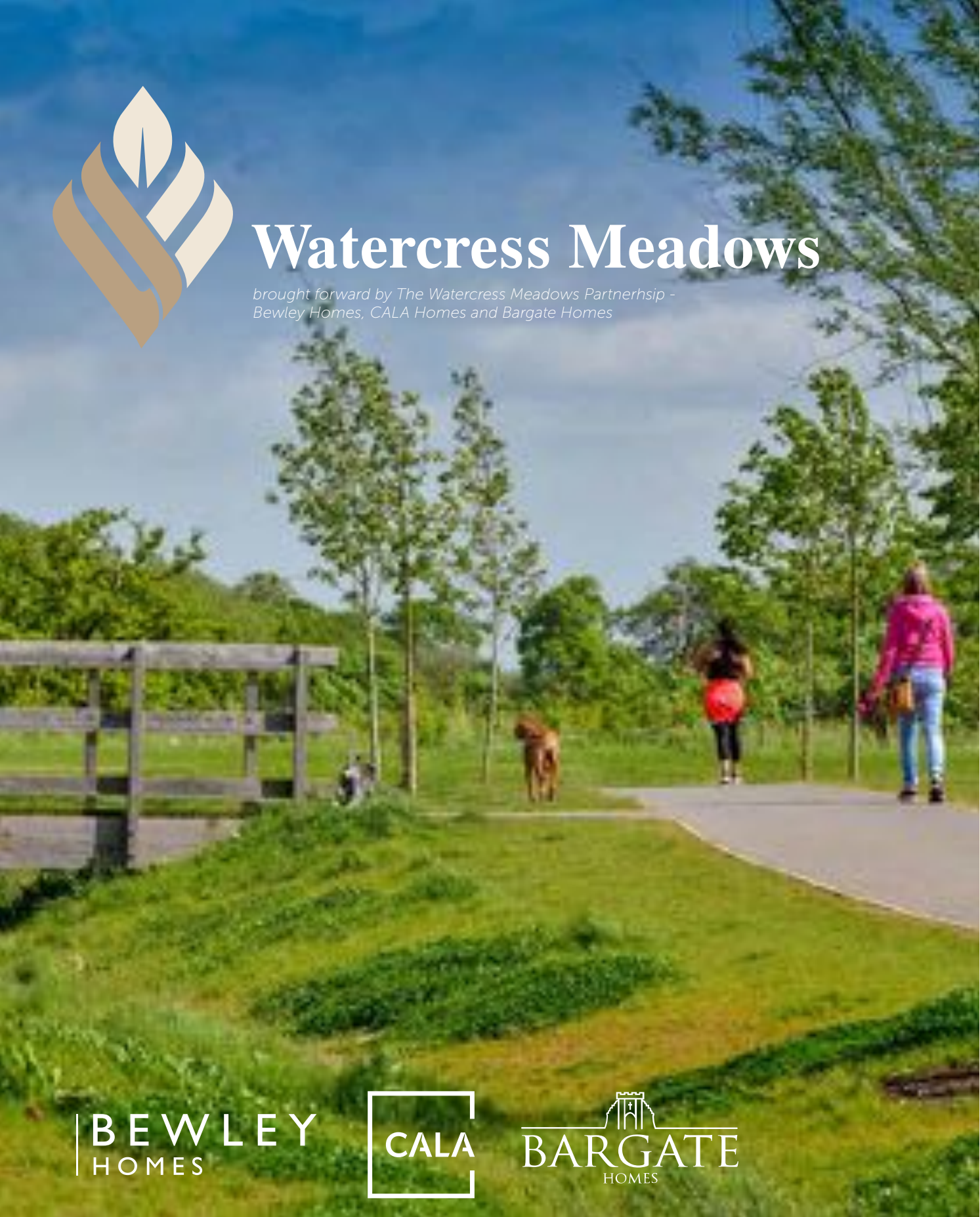


**BARGATE**  
HOMES



# Watercress Meadows

*brought forward by The Watercress Meadows Partnership -  
Bewley Homes, CALA Homes and Bargate Homes*



**BEWLEY**  
HOMES



**BARGATE**  
HOMES



# Introducing Our Collective Vision

South Medstead presents opportunity for delivering proactive responses to climate change through embedding innovative and sustainable technologies into design, creating truly walkable neighbourhoods which reduce reliance on private vehicles, and promoting a sustainable and healthy living.

We are currently in a period of unprecedented and rapid change. The importance of addressing climate change, social exclusion and biodiversity loss cannot be overstated. Major shifts in technology are predicted to change the way people live, work and travel. The pandemic and shift to home working for many has taught us all to appreciate connections to people, places and nature. Commuting patterns have changed dramatically, potentially for ever, and there is an increasing emphasis on health and wellbeing with a recognition that places need to be better designed, resilient for the future and encourage more active lifestyles.

Bewley, CALA and Bargate are committed to collectively shape an integrated and resilient future for South Medstead working in collaboration with local residents and businesses. Working in partnership we would like to sequentially bring forward Watercress Meadows as a residential-led mixed use community anchored around Lyminster Bottom Road in South Medstead.

We believe that this site is free from major constraints and in a sustainable location next to the settlement boundary. South Medstead can establish within its landscape setting, protect, and celebrate its local village identity and deliver far more than the sum of its parts to be a place where the community thrives for generations to come.

Watercress Meadows will shape South Medstead into a well-connected, smart, resilient and beautiful community. The development is proposed to meet the emerging housing needs of the District, alongside the delivery of associated infrastructure. We will do this by firstly embracing the delivery of planned strategic infrastructure including designing technological advancements to address climate change, shifts in lifestyle and ensuring social inclusion, secondly integrating connected green and blue infrastructure for nature recovery and well being and bringing forward high quality new homes to meet local needs embraced by our attention to detail, quality, craftsmanship and passion.

Buckler's Park, Bracknell | CALA  
Strategic green infrastructure delivery



Bellmount View, Vale of White Horse | Bewley  
Community collaboration & stewardship



Rivercross, Fareham | Bargate  
Quality, care and craftsmanship



# The Site



52.79 HA

130.45 ACRES

TOTAL SITE AREA







Brought forward by

# The Watercress Meadows Partnership

Bewley, CALA and Bargate are pleased to present this Placemaking Document to bring forward Watercress Meadows - a high quality landscape led extension to the community of South Medstead located on land to the west and east of Lymington Bottom Road which has an overall area of 52.79 hectares (130.45 acres).

Bewley, CALA and Bargate collectively make up the Watercress Meadows Partnership. We are clear that we wish to work with the existing community and stakeholders to listen first, be transparent and collaboratively shape this new place. At this early stage the Placemaking Document sets out our collective proposition and placemaking commitments that will set the ambition for resilience, drive innovation and ultimately mean that success will be in the legacy of the place, not just in its creation.

## About Us -

Bewley Homes is an award winning 5-star homebuilder, known for creating stunning developments which in turn form high quality and exciting new communities carefully designed to foster community interaction, sense of ownership and pride. With a legacy of placemaking for over 30 years, we understand that it's our responsibility to protect the environment that we build in and preserve the surrounding landscape through our approach to sustainability. Bewley's aim is to deliver quality places through the planning and development process by working with the local community and thinking carefully about each location and how homes will settle into the surrounding area.

CALA is one of the UK's leading new home developers. With over 30 years' experience, we remain committed to offering exceptional, affordable designs in some of the country's most sought-after locations. Our new properties range from riverside apartments, high quality starter apartments to elegant new countryside retreats, with a firm focus on quality and innovative home design. Our new Sustainability Strategy will help us achieve our targets of building homes that are operationally net zero carbon from 2030, and reaching net zero greenhouse gas emissions in line with the Scottish Government's 2045 target and ahead of UK Government's 2050 target.

Bargate Homes was established in 2006, to be a truly differentiated homebuilder in its product and guiding principles. A part of VIVID, one of the largest housing associations in the country since 2019, our house types differ site by site, looking to reflect the local area, with further differentiating architectural finishes set in landscaped spaces with areas to relax and play. We share a sense of duty to give back to the communities in which we develop and genuinely leave a positive legacy for future generations.



Lancaster Park, Hungerford | Bewley Homes





St Peter's Quarter, Chertsey, Surrey | CALA Homes



Birchwood, Romsey, Hampshire | Bargate Homes



Section 1

# The Proposal







Our commitment to South Medstead is to work together to shape a resilient future and a place not just for the present but for future generations. This means our proposals are shaped for the long term, giving equal weight to the environmental, social and economic sustainability of the community as a whole.



# Planning for the future

## Learning & education

Local primary school designed along the main street and located along the Health trail, equipped with play and recreational space.

## Activity & Play

Network of naturalistic equipped play and play-on-the-way trim trails catering to all age groups and activity levels.

## Employment Hub

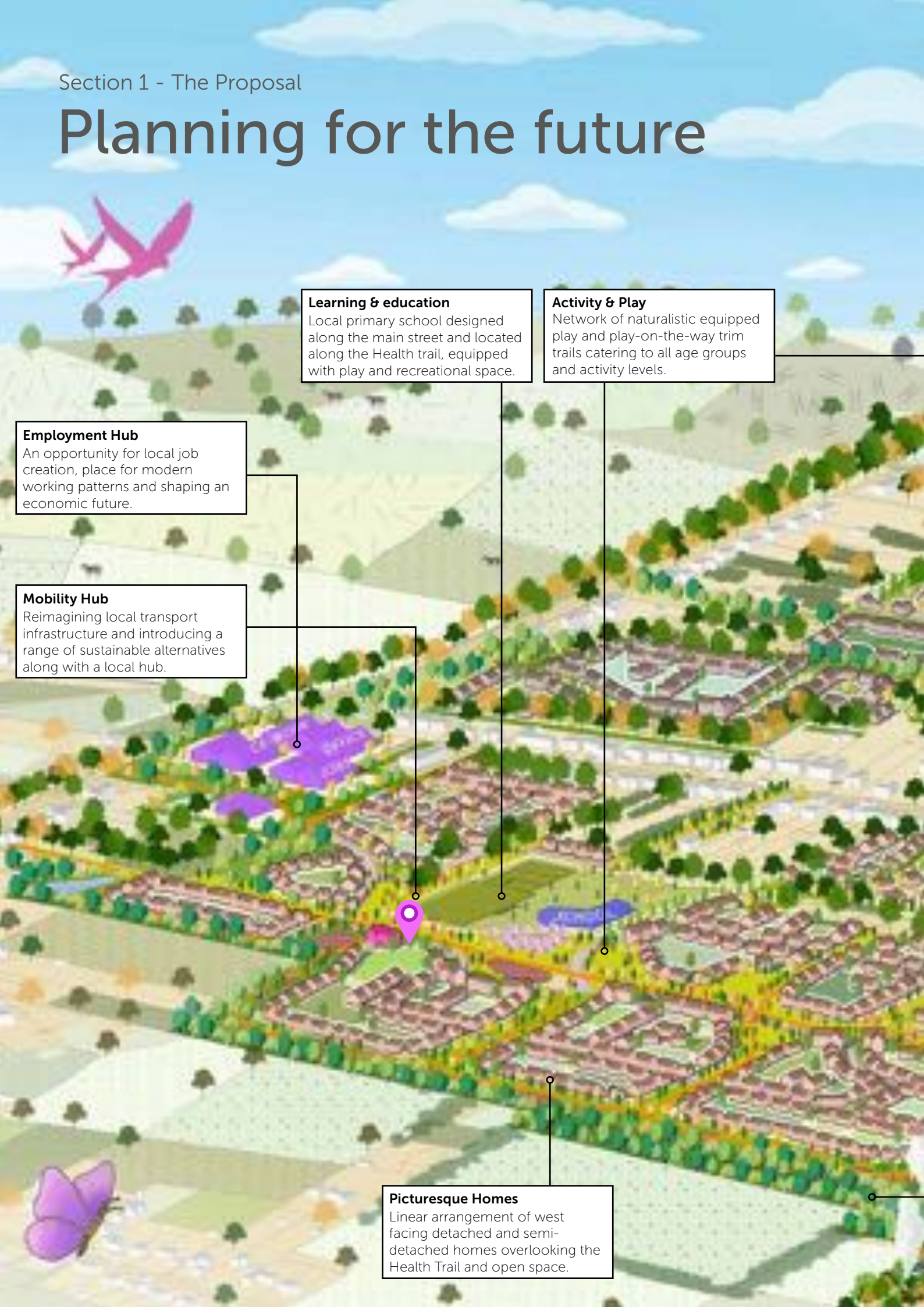
An opportunity for local job creation, place for modern working patterns and shaping an economic future.

## Mobility Hub

Reimagining local transport infrastructure and introducing a range of sustainable alternatives along with a local hub.

## Picturesque Homes

Linear arrangement of west facing detached and semi-detached homes overlooking the Health Trail and open space.





Our vision is to expand the notion of village appeal to broader target groups, making it attractive and ensuring it has something to offer to everyone irrespective of age, background, income, location, or career aspirations.

A resilient village is connected, smart, and green, housing a diverse and healthy community of residents and businesses in a unique, attractive and genuinely sustainable setting. It enables residents to live, study, socialise and shop locally. This section of the document sets out a collective ambition and explores a number of key components that should be considered when designing a resilient future for South Medstead.

**Watercress Meadows Health Trail**

A soft green and safe link winding its way through Watercress Meadows linking the neighbourhoods - new and existing.

**Farmsteads and Villas**

Grouping of farmsteads and villas arranged around intimate homezones, green links and village lanes.

**Tree lined mews**

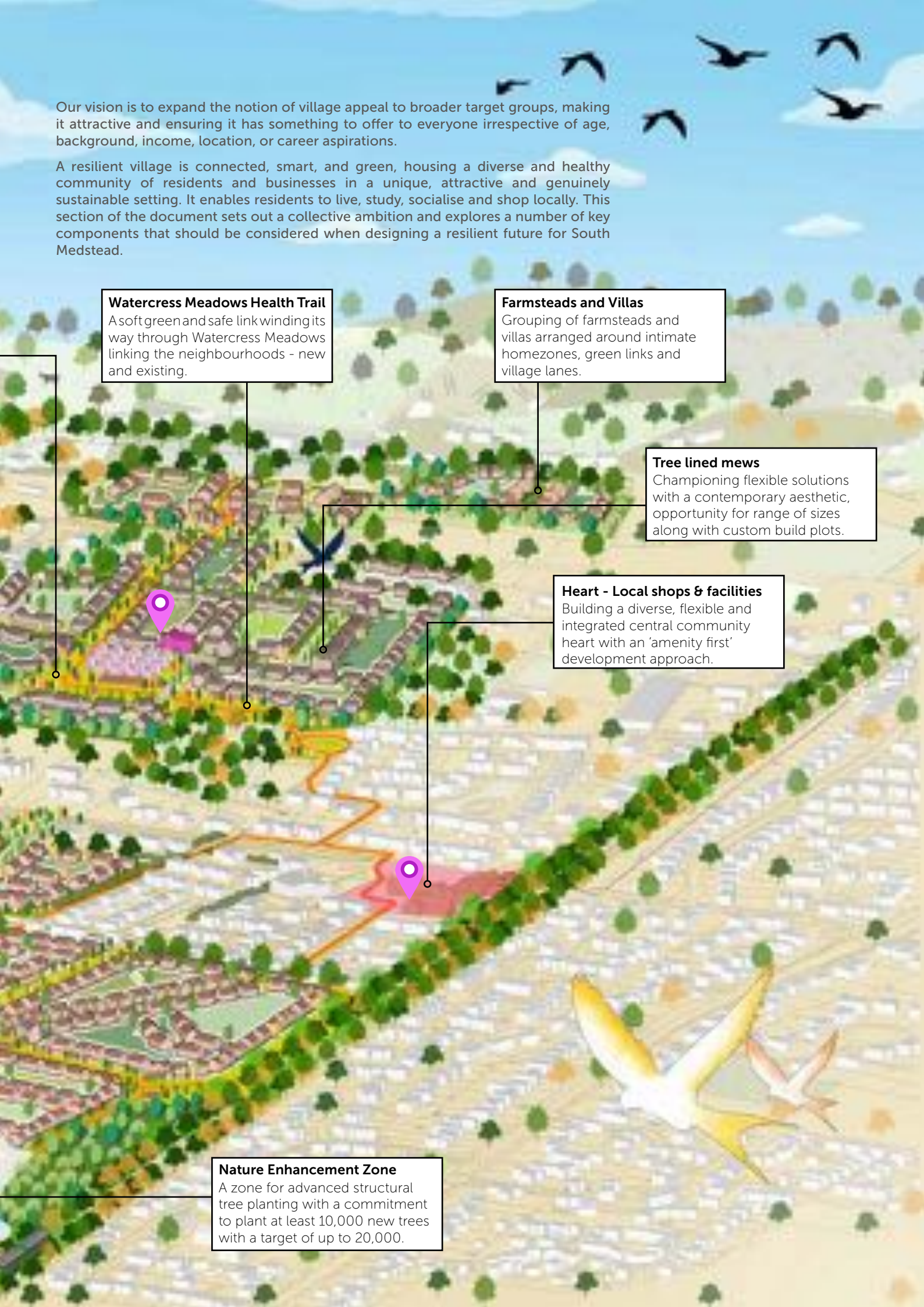
Championing flexible solutions with a contemporary aesthetic, opportunity for range of sizes along with custom build plots.

**Heart - Local shops & facilities**

Building a diverse, flexible and integrated central community heart with an 'amenity first' development approach.

**Nature Enhancement Zone**

A zone for advanced structural tree planting with a commitment to plant at least 10,000 new trees with a target of up to 20,000.





# Strategic Case

## 1. Why this location?

- An exciting opportunity is emerging at Four Marks and South Medstead to establish an exemplar of a vibrant, highly self-contained and sustainable community. A strategic approach to development will provide an opportunity to nucleate South Medstead into a sustainable and walkable garden community, supplementing the existing settlement with new social, economic and green infrastructure to make significant improvements. It provides an opportunity to deliver a proud legacy of locally distinct development which champions the local area and its attributes.
- The emerging new Local Plan is at an early stage of preparation, but East Hampshire District Council have already indicated that it will likely include a renewed emphasis on reducing travel distances and increasing opportunities for walking and cycling as a way of travelling to work, education and for other day-to-day needs. Early consultation on the emerging Local Plan has identified that embedding the principles of 'living locally' and of '20-minute neighbourhoods' will be key to achieving this vision.
- Housing development in Four Marks and South Medstead over recent decades has tended to come forward via small, piecemeal schemes and not as part of a more holistic vision for the settlement as a whole. As a result, whilst the existing services are sufficient to meet 'convenience' style needs, there has been little provision of other kinds of important services, such as green infrastructure or employment, and the village pub has long since closed. To this end, there is a unique opportunity at Watercress Meadows to deliver a high quality, design-led scheme which, alongside provision of new homes, consolidates and builds upon the existing services and delivers brand new social, economic and green infrastructure.
- Spatially, within the wider settlement, South Medstead is well placed to deliver the uplift in infrastructure, such as a new primary school, significantly enhancing the existing local centre to support its local, independent character, significant green infrastructure and leisure, complementing rather than competing with Four Marks.



## 2. Delivering social infrastructure and increasing self-containment

Four Marks and South Medstead, collectively, already has a number of core ingredients which underpin its role as a Small Service Centre, including employment spread over a number of sites, two local centres providing a mix of convenience, comparison and specialist retail, local medical facilities, some recreational open space and primary school facilities. It is an area characterised by small businesses and a high proportion of home working and whilst there are some obvious small service clusters, there is currently no opportunity to nucleate the settlement or provide a complementary walkable neighbourhood which will benefit all.

The pattern of ad hoc development in recent years, has been beneficial in responding to local housing needs. However, it has done little to deliver net increases in social, economic or environmental infrastructure. By contrast, the strategic vision for Watercress Meadows adopts a local approach to the delivery of social and economic infrastructure. It also includes the provision of a large number of new homes to underpin the core delivery of a walkable neighbourhood that:

- *Will regenerate and enhance an existing local centre, including provision of a new village pub, supplementing the existing offer of leisure, retail and complimentary medical services;*
- *Will deliver new employment space to provide for small businesses, providing for new jobs but also space for new local businesses as well as expansion space;*
- *Provides a hub space for people to work flexibly and also for people to work near home;*
- *Provides space for sport and recreation, walking and cycling;*
- *Provides for a new primary school serving the whole of South Medstead;*
- *Delivers a consolidated sustainable transport strategy, which supports public transport use, local transport hubs to improve bicycle and scooter facilities, improving the sharing of information on local services and facilities through a community app; and*
- *Delivers a joined-up approach to biodiversity net gain and natural capital, including the planting of up to 20,000 new trees and a move towards net zero carbon.*

This vision of greater self-containment and enhanced settlement sustainability is being prepared alongside a step change in social trends and working patterns, which were apparent even before Covid and have since been markedly accelerated. This is reducing consistent commuting, introducing the concept of more hybrid forms of working, where more people work from home or near home (remote from their usual place of work). A 'vision and validate' approach to the development proposals encourage the range of services and facilities to deliver a genuine walkable neighbourhood. Of course, this will benefit existing residents and also help to consolidate the existing services already on offer.





## Section 1 - The Proposal

# Strategic Case

Quantitatively, the proposals will target the delivery of infrastructure and space to support 1 job per household. This includes providing support facilities for those working from home, encouraging some daytime activity, which will have positive implications for the local economy and retaining household expenditure in the area, for both new and existing businesses. For example, it is an attractive proposition for a hybrid or homeworker, if they can access a flexible working hub with likeminded individuals, go to the gym, buy a sandwich and a coffee, take a walk in a high quality green infrastructure, do some shopping, go to the doctors or dentists or other therapeutic service, get their haircut or even go for a beer at the end of the day. Maybe not all in one lunchtime nor all in one day, but sometime and all set around a nucleated local centre or within walking distance.

### 3. A place to grow sustainably

The development envisaged would empower local people to meet many more of their day-to-day needs within the village, increasing the settlement's self-containment and in doing so, helping reduce the need to travel elsewhere. At any scale of settlement, self-containment is a key indicator of sustainability, and at Four Marks and South Medstead there is already evidence that many people are well placed to take greater advantage of a wider range of local services within the village. Data from the 2021 census shows us that 45% of working age residents usually work from home, in addition to a sizeable proportion of residents who have retired.

The mix of new uses proposed would be in addition to those currently provided within the village, rather than replicating them. They will increase the range of goods sold, generate an evening and leisure economy and promote more leisure-based uses to the benefit of the whole settlement. This will support a greater degree of expenditure retention within the village, and in doing so will result in a range of qualitative benefits, providing a critical mass of complementary uses in one location.

Provision of the new primary school in close proximity to the existing local centre will further enhance the village's sustainability, rationalising the catchment areas of the existing Medsted CE Primary School and Four Marks CE Primary School so that their respective catchment areas are each smaller, more walkable and more sustainable.

Overall, what sets the vision for Four Marks and South Medstead apart from other settlements in East Hampshire is the fact that the carefully considered growth proposed will underpin a step change to the sustainability of the settlement as a whole. This is not simply a question of 'bolting on' new homes to an existing settlement, it is an opportunity, through the development process, to transform the village to one in which a wide range of retail, leisure, education and employment needs are met locally, tightly aligning the village to the guiding principles of a 20-minute neighbourhood and setting it apart from its peers elsewhere in East Hampshire.







# Watercress Meadows

Bringing a shift in mindset



## Section 1 - The Proposal

# Site understanding

The overall site is made up of a collection of fields which are predominantly in mixed farming use, have either been domesticated following segregation from the farm holding over the years or continue to be used for grazing. The existing landscape features, including field boundaries and existing trees will be incorporated within the proposals. These pages summarises the key site characteristics. It can be concluded that the site is free from major constraints, sustainably located and is therefore available and viable.



### Landscape & Visual

There are no statutory designated sites situated within or immediately adjacent to the site. The nearest statutory designated site is Alresford Pond Site of Special Scientific Interest (SSSI), situated approximately 6.3km south-west of the site. The nearest International / European designated site is East Hampshire Hangers Special Area of Conservation (SAC), situated approximately 6.7km south-east of the site. Overall statutory designated sites within the wider area are significantly separated from the development site by extensive areas of existing development, infrastructure and open space.

Similarly, there are no non-statutory designated sites situated within or immediately adjacent to the site, although there are a number of sites located within the wider area. South Town Wood SINC is located about 40m north of the site. The nearest non-statutory designated site is Four Marks Scrub Site of Importance for Nature Conservation (SINC), located approximately 75m south-west of the site, which is physically segregated by the Watercress Railway Line.



### Ecology & Biodiversity Net Gain

There are no ecological statutory or non-statutory designations located within the site.

A number of trees at the site offer potential opportunities for roosting bats. The existing linear features present across the site in the form of hedgerows and treelines provide a network which also offers some potential opportunities for foraging and commuting bats. The site provides suitable opportunities for nesting and foraging birds in the form of hedgerow, scrub and treeline habitats. The survey recorded a potential outlier Badger sett situated to the south of the site which would form part of an enhanced green corridor to the south. Areas of longer, unmanaged grassland and tall ruderal vegetation provide superficially suitable potential opportunities for common reptiles. The existing hedgerows and treelines within and adjacent to the site provide superficially suitable habitat for Hazel Dormice and provide some level of connectivity to areas of woodland within the wider area. The site does not contain any protected trees (TPOs) within the site, although there are some along the boundaries. These will provide for biodiversity enhancement opportunities and will be integrated within the multi-functional green and blue infrastructure strategy of the proposals.



### Flooding and Utilities

The site is wholly located within an area zoned as being at least risk from flooding (Flood Zone 1). Sustainable drainage measures will form an intrinsic part of a multi-functional green and blue infrastructure strategy.

The site is accessible to main utilities.



### Heritage and archaeology

The site is not within the setting or any proximity to designated or undesignated heritage assets (such as listed building or conservation areas).



### Highways and Access

Lymington Bottom Road will act as the main point of all modes access for the western part of the site. Five Ash Road for the middle of the site and Stoney Lane for the eastern part of the site. The overall site will be interlinked between and with the local centre through the Watercress Meadows Health Trail.



### Footpaths

The site benefits from a network of footpaths, bridleway and byway surrounding and in close proximity. The National Cycleway route 224 is also within easy reach. This provides an opportunity to promote walking and cycling and encourage a healthy and active lifestyle. The Watercress Meadows Health Trail will interlink the site with the wider network.





Site characteristics and opportunity plan

Key							
	Site boundary		Secondary roads		Supermarket/Shop		Potential pedestrian/cycle access
	Contour line		Local roads		Fuel Station		Back of existing houses
	Watercress rail line		PRoW		Local centres		Existing trees and hedges
	Medstead and Four Marks railway station		National Cycleway (224)		Potential all-modes access		Interlinking Heath Trail
	Winchester Road (A31)						

## Section 1 - The Proposal

# Layered Placemaking

Watercress Meadows is an opportunity to create a landscape led neighbourhood extension where people of all ages can live, work, and visit. The following objectives have shaped the masterplan to create a sustainable extension to the existing settlement. Watercress Meadows will include -

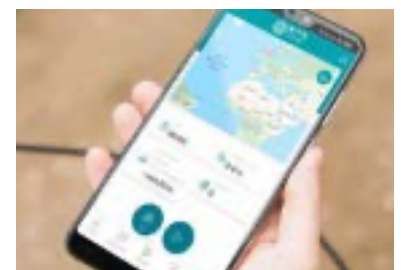
- A placemaking vision prioritising landscape and nature priority - The Watercress Meadows Health Trail will connect the neighbourhoods and acts as a heritage-health & well-being and leisure route.
- An infrastructure first approach ensuring localised highways improvements, advanced structural tree planting, local centre, school and employment can be delivered at the early stages.
- The concept of six walkable connected neighbourhoods to create a resilient South Medstead, anchored around Lymington Bottom Road.

### 1. A resilient green and blue infrastructure strategy

A robust multi-functional biodiversity and landscape strategy will drive the vision for Watercress Meadows.

This will consist of a network of existing trees, hedges, proposed woodlands, nature enhancement zone marked for significant tree planting and a hierarchy of amenity spaces - Community Green in the west, Pocket park in the middle and Green corridors to the east. New bio-diverse habitats and multi-functional drainage measures will add to the site wide mosaic.

Watercress Meadows Health Trail will not just interlink the site but offer the opportunity to all of South Medstead residents of its use this as a health and fitness trail. Complemented with milestones which can be connected through an 'app', signage, low key lighting as appropriate, trim trail, naturalistic outdoor gym and play on the way, this would bring a unique asset to the local area and aid help in community cohesion







## 2. Mobility

A healthy and active lifestyle less reliant on the car will be an intrinsic part of the proposals. By leveraging benefits of new technology and adopting a fresh design approach, Watercress Meadows and the wider South Medstead community will be able to reduce their reliance on private vehicles and become the forerunner for mobility innovation. This will be achieved through shared mobility, electric vehicles, mobility and cycle hubs, walking and cycling routes and opportunity to make less car journeys by having co-work spaces, local shop and facilities within walking distance of all residents. Public transport will also be available from Winchester Road for longer journeys. There will be an opportunity to extend the existing public transport route to the Local Centre, as the critical mass of the development comes online.



## 3. Integration and community cohesion

Integration of the new with the existing is one of the most important ingredients of successful placemaking. This encourages social inclusion, greater sense of belonging and community stewardship, creating a resilient and joyful place in the long run.

Six interconnected neighbourhoods will connect with the local centre along with the two mobility hubs and the existing neighbourhood, shaping into an integrated community over time. The Watercress Meadows Health Trail will wind its way through the connected neighbourhoods, facilities and will connect to open space and to the wider countryside – bringing best of both worlds and linking town and country.



# The Evolving Masterplan

## Development summary –

- Up to 1,100 new homes
- 2 form entry primary school
- Local centre working alongside two mobility/cycle hubs
- Employment Hub

## Open space infrastructure

- Linear nature park incorporating the Watercress Meadows Health Trail
- Destination play space next to the school complemented with LEAPs, LAPs and trim trails through the masterplan
- Community orchard with network of pocket parks for community cohesion
- Retained trees and hedges, enhanced structural planting in nature priority zone and along site boundaries

## Accessibility infrastructure

- Improved public footpaths linking town and country
- Highways improvements along Lymington Bottom Road and intersection with Winchester road
- Safe crossings along Lymington Bottom Road facilitating easy functioning of the Health Trail
- Safe crossings along Soldridge/ Five Ash Road linking to wider footpaths and the National Cycle Route.







Five Ash Road





















Stoney Lane

Medstead & Four Marks

Local centre

Winchester Road



- Key**
-  Site Boundary
  -  Potential all-modes access
  -  Potential pedestrian/cycle access
  -  Potential access to the site
  -  Public rights of way (ProW)
  -  Proposed road Improvements
  -  Proposed indicative signalised crossings
  -  Proposed pedestrian / cycle route and Watercress Meadows Health Trail
  -  Mobility Hubs (3 nos.)
  -  Cycle Hubs (5 nos.)
  -  Existing trees and hedges
  -  New areas of native tree and buffer planting
  -  Green corridors improving permeability across the site
  -  Multi-functional drainage basins and swales
  -  Areas for biodiversity enhancement
  -  Potential community orchard and allotments
  -  Play hubs/ Kickabout space
  -  Naturalistic play/Play on the way
  -  Drop off/ parking for school
  -  Public transport at local centre in later phases

## Section 1 - The Proposal

# Working towards Net-zero

Watercress Meadows will shape into an integrated part of the existing community of South Medstead over time and will be set in a beautiful and multi-functional landscape environment of bio-diverse habitats, parkland and play spaces with a distinctive and highly attractive aesthetic and architectural feel. This will consist of six inter-connected walkable neighbourhoods planned and designed as whole and composed of distinct character areas which will evolve as a response to the unique site characteristics and edge conditions. The six neighbourhoods will be connected by a landscape mosaic of productive greenery and a permeable network of streets, cycle routes and footpaths. Advanced planting and nature enhancement zones will ensure that by the time new homes are built, Watercress Meadows settles in the landscape with trees along streets and routes framing the foreground and mature trees in the background.

The proposal will respond to the precise conditions of the landform, landscape and ecology. Productive and permaculture landscape will define the overall setting. This will include orchards, wetlands and raised beds.

The proposal will include a new Employment Hub to the north of the site at the intersection of Lymington Bottom Road with Five Ash Road. In close proximity and accessed from Lymington Bottom Road will be the new Primary School. To the south will be the local centre.

To minimise short distance car trips, Watercress Meadows will include two mobility hubs that will function alongside the local centre. More detail on this is provided in Section 2. Six cycle hubs will be provided which will site Watercress Meadows branded bike and electric bike hire for existing and new residents. The neighbourhoods and facilities at Watercress Meadows will be interconnected by the Health Trail that will bring an active mindset and encourage walking and cycling for leisure and fitness.

A sustainable travel strategy will include opportunities such as Personal Travel Planning for all residents, Watercress Meadows Car Club for shared mobility, encouraging use of electric cars by providing each home with an electric car charging point, Personal Travel Planning (PTP) providing residents with information on the best routes and modes of travel to reach specific destinations and 'Watercress Meadows Community App' which may include - bookable rapid EV charging, car club, bookable e-bikes, community e-concierge at the local centre, food and parcel deliveries from the local centre, in-built health and neighbourhood activity app, potential bookable co-working space and information on community activities to encourage cohesion.

Additional investment and facilities at the local centre will assist in minimising car trips which along with a landscape led setting and energy efficient homes will work towards shaping Watercress Meadows into a net zero carbon extension of South Medstead.

## What will Watercress Meadows bring to South Medstead?



Up to 20,000 new trees



Watercress Meadows Health Trail

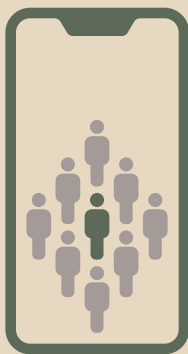


Destination Play Space & Play Trails for all ages





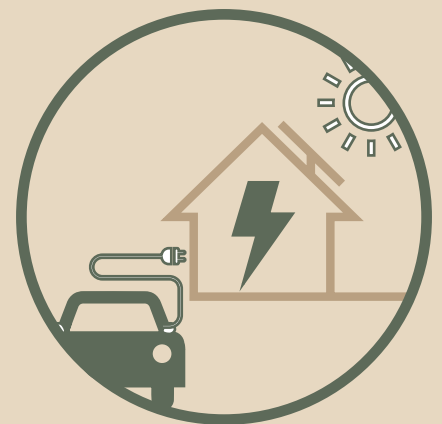
Impression of the local centre



Watercress Meadows  
Community App



Primary School, Nursery &  
Employment hub



Resilient Homes planned for  
the future

# Section 2

## Delivering our ambitions







Our ambitions for South Medstead will be driven through the Watercress Meadows Placemaking Charter - our commitment to you to create a connected, smart, sociable, green, healthy, stronger and traditional community in a unique, attractive and genuinely sustainable setting, all whilst retaining the inherent identity and charm unique to South Medstead.



## Section 2 - Delivering our ambitions

# Placemaking Charter

The global climate is changing, primarily as a result of greenhouse gas emissions from human activity. Communities, businesses, and the natural environment are already feeling the impacts of the changing climate. The pandemic has highlighted stark health inequalities which relate closely to environmental, social, and economic inequalities. This is no longer a time to live with divisions.

Now more than ever, high quality, sustainable and resilient design and development is needed to ensure that we create a durable framework for existing and future communities. Opportunities to combat loneliness, foster community strength, advocating healthy living and developing a framework for an equal community is central to this.

Critical to achieving all of this is infrastructure delivery and building resilience.

The UK Government and East Hampshire District Council have declared Climate Emergency. There is a strong and committed national and local policy context for planning environmentally, socially, and economically sustainable places. Watercress Meadows provides that opportunity to create the next sustainable chapter for South Medstead.

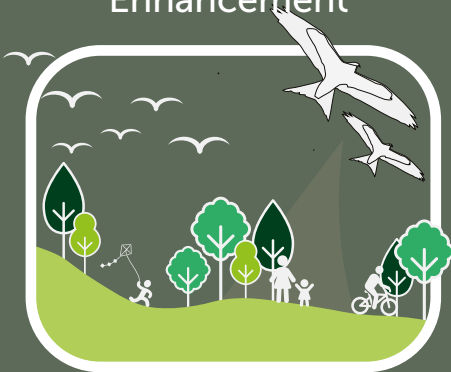
The National Planning Policy Framework has clearly highlighted the need to achieve resilient and well designed places through a clearly articulated Vision. Watercress Meadows : Planning for the Future supported by the Watercress Meadows Placemaking Charter is our commitment to working collaboratively with East Hampshire District Council, residents and local businesses to shape a progressive, exemplar and deliverable place that the local community can be proud of. The vision for Watercress Meadows is underpinned by an uncompromising approach to community cohesion and sustainability and within that access to homes for all via genuine affordability.

Watercress Meadows will deliver transformative investment in transport, landscape, nature enhancement and community infrastructure, embed community cohesion at its heart and create a joyful and resilient place to live.

This document sets out 6 founding principles which constitute the Watercress Meadows Placemaking Charter. This will be discussed and evolved with key stakeholders and the community and in line with the emerging new regulations and the Council's Climate and Environment Strategy 2020-2025 and beyond.

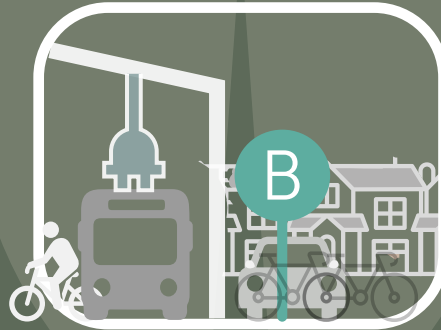


## Landscape & Nature Enhancement



Never before has access to a green and natural environment become so important to the well-being of so many. Watercress Meadows will unlock private farming land and transform this for the local community's health, well-being and nature enhancement.

## Transport & Infrastructure



A shift to shared vehicles - such as bike share, e-scooter share, car clubs, using public transport and on-demand services - has the potential to provide numerous benefits over private vehicle ownership. Watercress Meadows will commit to a modal shift to reduce carbon emissions from travel.

## Mobility, Health & Well-being



Routes & paths within the Watercress Meadows are of equal importance & should deliver diverse and safe connections for pedestrians and cyclists. 'Connections for all purposes' and linked to the Watercress Meadows Community App will provide a framework to promote healthy & active living.

## Beauty & Craftsmanship



The Watercress Meadows Partnership formed of award winning home builders Bewley, CALA and Bargate Homes have a shared pride and passion for the homes they build, what they build and how they build.

## Climate Resilience



UK Government is now bound by law to reach net zero carbon by 2050. Watercress Meadows will be planned for the future, designed with climate resilience at front of mind in order to minimise their environmental impact and maximise their sustainability, moving from non-renewable energy sources to electricity, and other greener sources.

## Delivery & Stewardship



A commitment to a genuinely 'People First' approach to community engagement, ensuring proposals are shaped by the community, alongside collaboration with the Council and statutory consultees. A Community Trust will be formed to maintain the quality & legacy of Watercress Meadows.

# Landscape & Nature Enhancement

Green infrastructure brings delight and has been repeatedly proven to have a positive impact on levels of health and wellbeing (both physical and mental), as well as air quality, carbon emissions and biodiversity. At Watercress Meadows, access to functional, purposeful and interesting spaces that raise happiness and community spirit while reducing environmental impact will be a key priority. Encouraging residents from South Medstead to use their local greenspace would also improve community cohesion and identity.

Designing such an environment to encourage social interaction from the outset can also be a key way of tackling the issues of isolation and loneliness and creating community resilience, a condition that has become more prevalent during the recent global pandemic. The green and blue infrastructure strategy will create a strong identity and provide a wide range of recreational and active uses – integrating both ecological and community functions. The multi-functional green and blue infrastructure strategy will include the following objectives -

1. Retention of existing trees and hedgerows and adding a carefully selected palette of native species to the existing mosaic; Advanced planting will respond to the visual context to strategically provide filtering of views, break-up massing of development and allow for views out from the site.
2. A Nature Enhancement Zone in the western part of the site which will target for up to 20,000 new trees in the early stages of the development programme to allow these to grow and mature and available for the existing and South Medstead community to enjoy;
3. A strong focus will be placed on re-wilding and habitat creation, with a target biodiversity net gain of at least 10%. An ecological transformation will regenerate biodiversity through the conversion of agricultural land to natural ecosystems – a patchwork of woodlands, copses, linear tree belts, hedgerows and wildflower meadows, wetlands and natural ponds;
4. Two equipped naturalistic play spaces will be integrated in the network - one in the western and second in the eastern part of the site. These will be connected to trim trails and play-on-the-way opportunities;
5. All the above will be connected by the Watercress Meadows Heath Trail - a green link that will weave through the neighbourhoods; and
6. Encourage bio-living - a regenerative concept consisting of orchards, foraging patches and linked to the farm shop at the local centre. This will encourage organic food production, water management and waste-to-resource systems.







Landscape and Nature Enhancement Framework Plan

Objectives will include -



Retention of existing landscape assets



New planting with a target of up to 20,000 new trees



Achieving 10% BNG



A network of play spaces for all ages



Watercress Meadows Health Trail with a network of routes



Bio-living – growing opportunities with the community



# Transport & Infrastructure

To help address environmental challenges and bring about a less carbon intensive future, a development must have a proximity to jobs, services, existing transport infrastructure and future investments being made. These fundamentals are all provided by The Partnership's proposal to deliver Watercress Meadows. Today and since the Pandemic many have newly prioritised life values. The way in which people chose to work and live are different from what used to be five years ago. Watercress Meadows will therefore be planned to respond to this differently and structured around the principle of 10-minute neighbourhoods to not just minimise but remove the necessity to make short distance car trips and use soft modes (walking and cycling) instead of the mindset to 'jump into the car'. Medium distance trips will be encouraged through use of public transport available from A31/Winchester Road or potentially the local centre in the future and shared mobility resources. Drone stations and Amazon click & collect can also reduce the need for travel and reduce the overall carbon footprint of residents. This can be linked to the Community App. Fitness goals can also be incentivised to all residents through the App. The transport and infrastructure strategy will include the following objectives -

1. Educating and Incentivising low carbon travel and providing a range of options which are easily accessible and well maintained;
2. The site has the fantastic advantage of located close to existing infrastructure. Objective would include working in collaboration with East Hampshire District Council and Hampshire County Council to formulate a holistic approach to wider infrastructure improvements;
3. Mobility Hub and the Local centre promoting the concept of 10minute neighbourhoods and local travel hubs alongside six cycle hubs from where residents and visitors can take and leave e-bikes for travel;
4. Electrification at Watercress Meadows offers further opportunities to encourage a shift to electric cars and ebikes for medium distance or 'last mile' trips, combined with enhanced dedicated cycle infrastructure. Shared mobility will include a pool of electric modes for sharing;
5. Personal Travel Planning (PTP) could be offered to all residents of the development, which would provide them with tailored information to make regular trips, such as journeys to work and school. PTP would have a long term impact by identifying and targeting the most sustainable travel options for the most frequently made journeys; and
6. Providing local facility including a primary school and nursery alongside an employment hub and local centre that can include co-working spaces and workshop areas.







Landscape and Nature Enhancement Framework Plan

Objectives will include -



Low carbon travel - Public transport, Car Clubs, Electric cars & bikes, walking & cycling



Wider infrastructure improvements including safe crossings



Mobility Hub and Cycle hubs within easy reach of all homes



Shared mobility including car club, e-scooter and e-bike hire



Personal Travel Planning linking to the Community App/ mypage.



Reducing local travel through provision of local facilities - School, work spaces & jobs





# Mobility, Health & Well-being

*Evidence shows that living in a greener environment can promote and protect good health, and aid in recovery from illness and help with managing poor health. People who have greater exposure to greenspace have a range of more favourable physiological outcomes. Greener environments are also associated with better mental health and wellbeing outcomes including reduced levels of depression, anxiety, and fatigue, and enhanced quality of life for both children and adults - Improving access to greenspace: A new review for 2020, Public Health England March 2020. Public Health England has identified a strong correlation between outdoor activity and preventing obesity, diabetes and depression. At Watercress Meadows, we will create a place where many different forms of outdoor activity are made readily available to those who live and work there and nearby. The mobility, health and well-being strategy will include the following objectives -*

1. A network and hierarchy of routes designed across the development will promote permeability and legibility. The proposals will integrate walking and cycling routes, connect to wider public footpaths and the National Cycle Route, open spaces, parks and doorstep green, community orchards, foraging patches, wetlands and woodlands and the local centre;

2. The dedicated Watercress Meadows Health trail will loop through the development and existing neighbourhoods and can include a short and long loop health trail along with varying levels of outdoor play and fitness opportunities for all ages;
3. The central green spaces in the western and eastern parts of the site can accommodate wellness events e.g. outdoor HIIT, yoga and pilates classes organised by the Community Trust and available to book through the App. Local 4k community runs can also be organised.
4. The local centre can include a community gym to provide indoor facilities and personal training classes. This will create local jobs and help in community cohesion;
5. Appealing routes and spaces will accommodate recreation and exercise, and also feature areas suited to relaxation and contemplation. These will offer appreciation of nature and wildlife: bringing nature closer to people is proven to improve mental health and well-being; and
6. Ensuring routes are lit where appropriate and they are safe. The masterplan in later stages will be designed to comply with the Secured By Design Home 2023 Design guide and good placemaking principles.



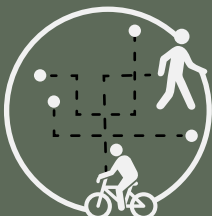


Mobility Framework Plan

Objectives will include -



Network and hierarchy of walking, cycle routes, dogwalking and nature explorations trails



Watercress Meadows Heath Trail combining play-on-the-way, short and long loops for varying fitness levels



Community well being events e.g. Yoga and pilates workshops



Health and well being indoor facility at the local centre e.g. Community run local gym - opportunity for job creation and cohesion



Engaging with nature including foraging, nature exploration and harvesting



Safe and inclusive spaces for all / improved public realm, compliance with Secured by Design





# Beauty & Craftsmanship

Housing should be geared around the creation of communities, with a mixture of housing appropriate for different demographics. The vision for Watercress Meadows is to create a community planned for the future, underpinned by an uncompromising approach to community cohesion and sustainability and within that access to homes for all via genuine affordability. Watercress Meadows will provide high quality new homes across all tenures, with a balanced mix of affordable, shared ownership and privately owned homes to attract residents from all walks of life. There will also be a potential to include custom-build homes.

Overall, Watercress Meadows will deliver up to 1,100 new homes including policy compliant affordable housing. These will be set in a rich landscape setting and made of three neighbourhoods - 1. Land to the west of Lymington Bottom Road referred to as Lymington Park; 2. Land to the east of Lymington Bottom Road to Stoney Lane referred to as Beverley Green; and 3. Land to the east of Stoney Lane referred to as Beechlands Farm.

The prevalent use of remote home working will be important to consider such that new homes in this proposed development facilitates this increasingly common trend. This could either be a dedicated space within the home itself (with space provided in place of garages) or space within the curtilage of the property, with the necessary infrastructure (power and internet) connections in place to allow an external workspace

pod to be installed if required. The beauty and craftsmanship strategy will include the following objectives -

1. Watercress Meadows Design Code shaped in collaboration with the local community that will drive the quality and placemaking ambitions;
2. Wide mix and range of new homes including custom build. These will be such that they are capable of adaptation over time and will enable the Watercress Meadows housing stock to be variable and cost-effective;
3. The proposed development will be part of the Considerate Constructors Scheme and The Partnership will develop a robust and responsible Construction Management Plan in consultation with local residents along with the Council;
4. Traditional palette of materials to ensure homes are beautifully designed, with a traditional form outside and modern inside;
5. A range of options including Traditional and Modern methods of construction to ensure they are robust and buildings for life; and
6. Crafting new homes with care, passion, attention to detail, quality of build and craftsmanship to ensure new homes at Watercress Meadows leaves a legacy and one can be proud of.

## Objectives will include -



Commitment to creating a high quality place through a Watercress Meadows Design Code evolved in collaboration with the community



Wide mix and typology of home sizes and tenure including potential opportunity for custom build homes and much needed affordable and starter homes



Part of the Considerate Constructors Scheme; Construction Management Plan developed in engagement with existing residents



Use of a traditional palette of materials and exploring opportunity to source materials locally to reduce embodied carbon footprint



Traditional and Modern methods of construction, building homes that are robust and resilient



Building homes with care with attention to detail, quality of build and craftsmanship









# Climate Resilience

Delivering sustainable development is a fundamental goal of the planning system and planning policy is evolving at all levels to set the road map to a lower carbon and climate responsive future. At the national level the government has set out its Planning and Energy White Papers. The new Future Homes Standard (FHS) should ensure that all new homes built from 2025 will produce 75-80% less carbon emission, whilst more locally East Hampshire District Council has declared a climate emergency and set out its Climate and Environment Strategy in 2020.

We believe it is vital to look beyond current standards and requirements and to creatively apply the energy hierarchy and future-proof Watercress Meadows to adapt to changing lifestyle and working patterns. Our ambitions will aim deliver a fossil fuel free residential community, adopting a 'fabric first' building approach aligning with and exceeding Future Homes Standard where possible, maximising the opportunities for renewable energy and investigating the opportunity for a Community Smart Energy Hub designed alongside the Mobility Hub, enabling the development to become **Net Zero Carbon**. The climate resilience strategy will include the following objectives -

1. By employing a fabric-first approach, new buildings at Watercress Meadows can establish a self-sufficient ambient temperature, reducing the need for intensive

heating and cooling systems. This would allow houses to align with the UK's net zero carbon targets from day one;

2. The use of photovoltaics and energy storage will be integrated into every home to serve residents, businesses and the shared mobility network. Watercress Meadows's sustainable energy infrastructure will also include the use of ground source heat pumps. Air Source heat pumps and hydrogen power can be considered in the future, subject to availability, cost and technology.
3. A holistic approach to water management will include the provision of grey water recycling in homes, rainwater recycling across the proposal connecting landscape irrigation to washing vehicles, thereby conserving potable water during future droughts and integrating SUDS with amenity space throughout.
4. Smart appliances connected to the App and every home network will enable remote connectivity and more responsible use to cater to peak and off-peak demands;
5. As part of our green commitments, we will plant up to 20,000 new trees which equates to approximately 20 trees for every new home across the site.
6. A Community Energy Smart Hub can be explored at the local centre and mobility hubs, subject to viability. They will act as local sources of both incoming and outgoing energy, achieving a balance between distribution losses and efficiencies through community sharing.

## Objectives will include -



Improved building energy efficiency and fabric performance (exceeding FHS)



Renewable energy generation on site including photovoltaics & air source heat pumps



Increase water-use efficiency and Grey Water recycling



Smart appliances connected to each home network



Commitment to plant 20 trees for every new home across the site



Community Energy Smart Hub, incorporating Active Network Management, battery storage technologies & EV charging facilities









# Delivery & Stewardship



We firmly believe that creating a place that is loved by the community is key to establishing a lasting legacy at Watercress Meadows. Governance and stewardship are critical elements in the successful creation and ongoing development of new communities and are a key tenet of the principles of a well designed place as set out in the National Design Guide. Putting in place sustainable long-term arrangements for management and maintenance will ensure that the quality standards of the development will be maintained and provide opportunities for community growth and involvement. We are committed to work alongside the Authorities in the establishment of an appropriate governance structure and long-term stewardship model that realises the best from public/private partnership and will ensure Watercress Meadows delivers against the quality standards envisaged from the outset.

The delivery and stewardship strategy will include the following objectives -

1. Watercress Meadows will propose a Community App that will help its residents use the development's facilities and also understand their impact/footprint on the environment. This Community App will be available in an 'app' format or a website. This will also provide information on shared mobility and collectively add to the sustainable lifestyle at Watercress Meadows;
2. Through a Community Management Trust, it is envisaged that over a period of time a framework is drawn up for the long term maintenance, management and financial sustainability of the assets in a form that can be worked into agreed business plan(s). The Trust will lead the management of shared mobility resources;
3. Involving the local community in the design and application of uses in the local centre in the long term to ensure it is fit for purpose. This will add value to wider community inclusion aspirations;
4. Data and smart systems needs to be at the heart of any new community. The ability to connect to the immediate community and with our neighbours and friends on a digital platform is essential in today's social context. Watercress Meadows will enable residents and the local community to connect to high speed fibre broadband and over time transfer to a 4G network;
5. The Community Management Trust in its role of looking after the strategic green infrastructure assets will provide a cost-effective approach to green and blue space management that guarantees its long-term future; and
6. The Watercress Meadows Partnership as part of the customer satisfaction plan will commit to post occupancy survey including building, energy use and resident satisfaction.

## Objectives will include -



Watercress Meadows Community App available to residents and South Medstead community



Watercress Meadows Community Trust managing shared mobility resources - car club and ebike hire facilities



Working in collaboration with existing residents and local businesses to shape the local centre so it meets current and future needs



Increased digital connectivity, educating and encouraging use of a Community website with all information to hand and linked to the app



Stewardship - Watercress Meadows Community Trust managing the strategic landscape resources working in collaboration with Council



Post occupancy survey and evaluation to ensure a smooth, comfortable and enjoyable experience







# Section 3

# Deliverability & Phasing







Watercress Meadows will facilitate and foster a culture of sustainability amongst its residents, and overall, encourage them to treat energy as an asset. Working collaboratively with existing and new residents, the Watercress Meadows Partnership will sequentially deliver a resilient place with a landscape and infrastructure led approach.

## Section 3 - Deliverability & Phasing

# Parcelisation Strategy

The Watercress Meadows parcelisation strategy is based on three principles and will take a comprehensive masterplan led approach guided by the Placemaking Charter. These three principles are -

1. Landscape led - To ensure that the proposal is nestled in its wider landscape context, factor in areas of advanced tree planting.
2. Infrastructure first - To enable community cohesion, infrastructure delivery will work hand in hand with delivery of new homes.
3. Catering to local needs - Each parcel as they come forward will provide a mix of new affordable, starter and family homes and potentially some custom build plots.

Any advanced energy infrastructure required to create a resilient community for the future will also be holistically considered and planned for Watercress Meadows as a whole.

The aim is to deliver the required primary infrastructure, investments to highways, new buildings, key social facilities and green infrastructure in a manner consistent with maintaining a deliverable and viable development. Based on the Placemaking Charter objectives set out in this document, the parcelisation strategy assumes the following -

- Early delivery of advanced tree planting at the Nature Enhancement Zone;
- Delivery of facilities at local centre along with two Mobility Hubs delivered at the appropriate time;
- Employment Hub
- Primary School & Nursery
- Overall 1,100 new homes in a range of sizes and tenure delivered in three phases. More information is provided on the next page.



Indicative Sequencing Plan





Sequence 1

The plans to the left illustrate an indicative sequencing scenario based on a masterplan led approach and underpinned by our commitment to sustainability, climate change and community cohesion. These will be discussed in further detail and will evolve as we progress. For legibility and ease of reference, the overall development area is split into three neighbourhoods. All three sequences will deliver open space, infrastructure and new homes in a cohesive manner working collaboratively with the Watercress Meadows Partnership, local residents and businesses and stakeholders.

## Sequencing Summary

**Sequence 1** will include the following -

- Nature Enhancement Zone including advanced tree planting across the site
- Delivery of access and highways improvements as required along Lymington Bottom Road and A31/ Winchester Road
- Delivery of up to 400 homes - 200 at Lymington Park, 125 at Beverley Green and 75 at Beechlands Farm
- Facilities at the local centre
- Partial delivery of the Watercress Meadows Health Trail along with open space, play, orchards, planting, cycle hubs and sustainable drainage
- Employment Hub

**Sequence 2** will include the following -

- Delivery of access and highways improvements
- Delivery of up to 350 homes - 225 at Lymington Park and 125 at Beverley Green
- Delivery of all facilities at the local centre and delivery of the eastern Mobility Hub
- Partial delivery of the Watercress Meadows Health Trail along with open space, play, orchards, planting and sustainable drainage

**Sequence 3** will include the following -

- Delivery of access and highways improvements
- Delivery of up to 350 homes - 225 at Lymington Park and 125 at Beverley Green
- Delivery of the western Mobility Hub
- Complete delivery of the Watercress Meadows Health Trail along with open space, play, orchards, planting and sustainable drainage



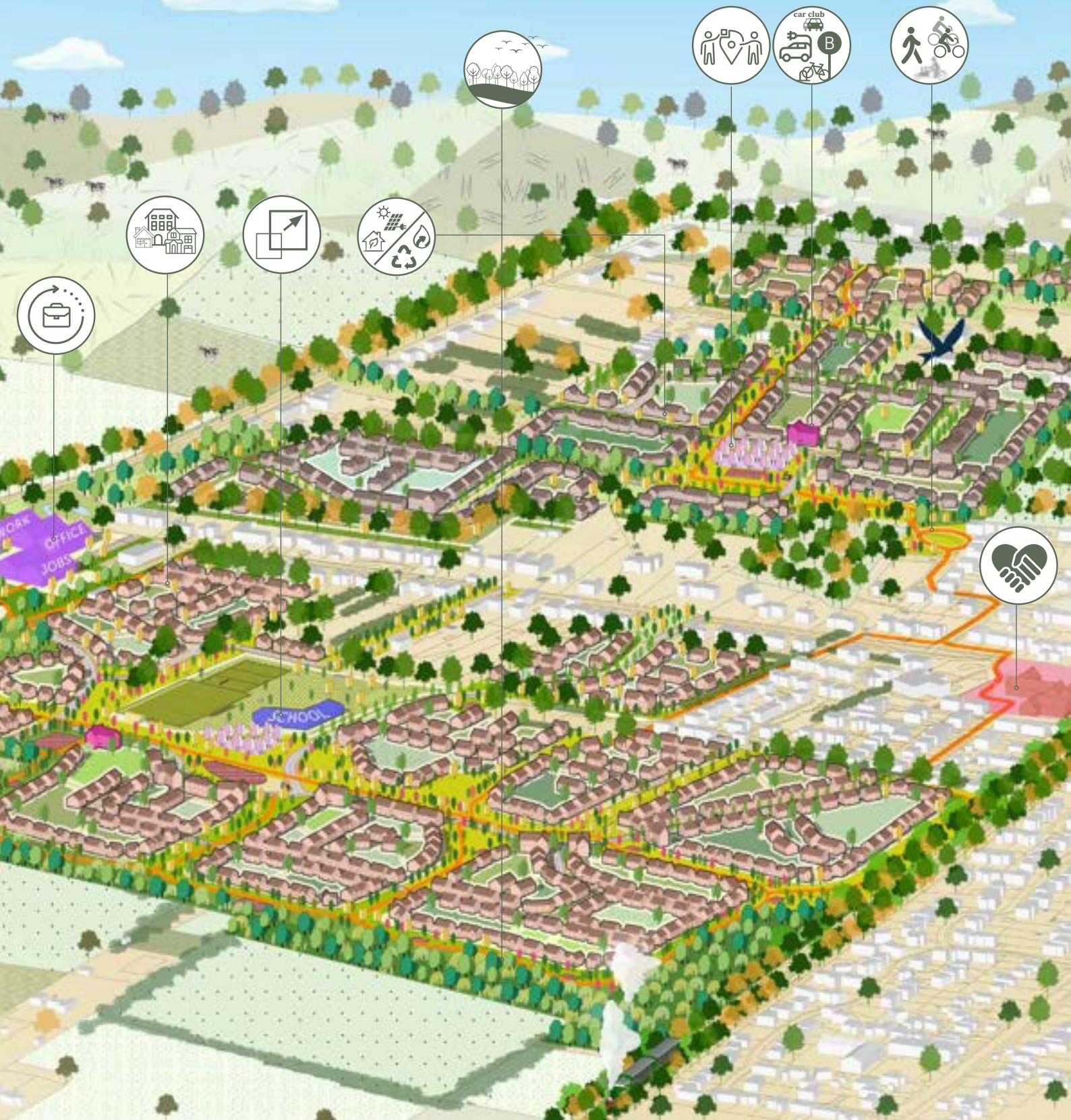
Sequence 2



Sequence 3



# Summary





This Placemaking document has demonstrated through a comprehensive landscape led masterplan approach that Watercress Meadows can create a resilient future for South Medstead, deliver on critical infrastructure and shape into a place that is not just another cul-de-sac housing development.

Our Placemaking Charter sets out a holistic approach to 'planning for the future' to ensure that South Medstead as a village is connected, smart, sociable and green, housing a diverse and healthy community of residents in a unique, attractive and genuinely sustainable setting, all while retaining the inherent identity and charm that makes them an intrinsic part of Hampshire's cultural fabric.

Watercress Meadows will be designed from the outset as a place that will welcome the surrounding neighbourhoods and visitors to share the use of these facilities, complementing existing provision in the surrounding area and providing benefits to the wider community. These benefits will manifest themselves in many ways, including through new employment and educational opportunity, investment in infrastructure and services, and through the creation of a place that exemplifies environmentally sensitive and resource efficient design.

Watercress Meadows will be aligned to the needs and desires of the local community - not just the community of today, but that of the future too.



### Nature Enhancement

Shaping an integrated green & blue infrastructure network including advanced planting of up to 20,000 new trees, nature enhancement zone, habitat corridors, amenity open space, play, orchards & doorstep green.



### Heathy & Active lifestyle

Connecting with each other using the Watercress Meadows Health Trail that weaves through the neighbourhoods, includes health milestones, play-on-the-way, trim trails, food growing/foraging and community cohesion.



### Low Carbon Mobility

Embracing the mindset of carbon footprint reduction and using low carbon travel such as shared mobility/car clubs, electric cars and bikes, public transport and encouraging walking and cycling for work, health and leisure.



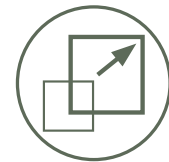
### Village Economy

Integrating a new employment hub to create local jobs, planning for co-working spaces to accommodate flexible working within the village itself & empowering remote working through high-quality digital connectivity.



### Village Heart

Providing flexible, multi-functional buildings with the Heart connected to the mobility hubs and linked to the Watercress Meadows Community App; opportunity for community stewardship and "meanwhile" uses.



### Scale & Size

Delivering up to 1,100 new homes in a mix of sizes and tenure including custom build plots; Hubs within a 10 minute walk of all homes; primary school education and nursery facility to be provided within the village.



### Homes for All

Designing in a variety of typologies and tenure to establish a diverse, integrated and sociable community; embracing gentle density and building sustainable homes crafted with care and high quality materials & craftsmanship.



### A Resilient Village

Creating fabric-first homes and buildings and utilising sustainable forms of energy to provide affordable living; embracing future innovations and encouraging sustainability, reuse and recycling as a community lifestyle.



### Cohesion & Stewardship

Building collective responsibility of all involved to instil and encourage community ownership at Watercress Meadows, planning for the future and delivering on infrastructure to make South Medstead resilient.



Produced by

# Boyer

RIBA   
Chartered Practice

BEWLEY  
HOMES



  
BARGATE  
HOMES



## Appendix 3: Transport Technical Note

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## Technical Note

Project No: ITB16527  
Project Title: South Medstead Development Opportunity  
Title: Local Plan Transport Reps  
Ref: ITB16527-004  
Date: 4 March 2024

### Executive Summary

Cala Homes, Bewley Homes and Bargate Homes are collectively promoting land at South Medstead for a strategic mixed-use sustainable community, which will offer 'good growth' and improve the existing facilities and services of South Medstead and northern Four Marks. This would significantly improve travel patterns and sustainability for existing residents, reducing carbon impacts, by providing core facilities such as schools, shops and leisure facilities in the heart of South Medstead, removing the need to travel longer distances and navigate across the A31 for access to services, as currently persists.

EHDC has however identified an alternative Site at Neatham Down Farm, Alton, as a strategic allocation in its emerging Local Plan. The Promoters of South Medstead consider that this would result in an isolated and poorly connected option for growth that would not be able to offer complementary opportunities for existing residents to reduce travel; therefore all resulting in unsustainable development that would not assist the Council achieve its decarbonisation goals.

This note considers the EHDC evidence base as it relates to accessibility matters, considering the soundness of the approach and the assessment of key sites (i.e. South Medstead and Neatham Down Farm).

Overall, there are significant concerns with the appraisal approach taken by EHDC on accessibility matters, which undermines the ability for EHDC to soundly decide where 'good growth' can be best located within the district.

Critically, the methodology followed by EHDC (which it has termed LSAAT) relies on a high-level and bespoke tool which introduces inevitable subjectivity and inconsistency. Moreover, the approach is fundamentally flawed in:

- Considering distance as the only consideration of accessibility, failing to consider the ability to achieve safe and attractive physical connections to facilities, which are fundamental to accessibility. Without the ability to connect to services, distance appraisal is irrelevant.

- Making no consideration of facilities and services that can be provided or improved on site or nearby as a result of strategic development opportunities. As such, it provides a false appraisal of the potential for sustainable development to be achieved under strategic development options.

In relation to the assessment of the South Medstead Sites the approach is further flawed through its approach to consider development in South Medstead as individual parts / sites, rather than as a singular comprehensive and strategic development as it has been promoted. In doing so the evidence base fails to appraise the relative opportunities fairly and soundly against other options for strategic growth in the district.

In addition to the fundamental flaws in approach, there are inbuilt errors of the assessment as it has been carried out, both in relation to Neatham Down Farm and to the opportunity at South Medstead:

- **Omission of existing Facilities** - The appraisal omitted and underscored numerous important everyday facilities that exist adjacent to the South Medstead Sites, as well as new facilities currently being delivered, both of which would materially improve the accessibility score adjudicated.
- **Failure to include proposed new facilities** - The assessment has not considered new key facilities that would be delivered by South Medstead which enhance its accessibility, including schools, local centre enhancements, sports provision, and open spaces. This is critical to the question of accessibility not only for new residents but for the community more widely. The ability to deliver facilities which would serve the significant existing residential communities in the adjoining area of the Site intrinsically reduces travel demands and improves the ability for travel to be made sustainably. This is a key benefit of locating development adjoining an existing community, as in the case of the South Medstead proposals, rather than growth isolated from the community, as in the case of Neatham Down Farm.
- **Errors in calculating accessibility** – The assessment of Neatham Down Farm includes various facilities and services which do not meet the LSAAT criteria, with schools, shops and facilities relied upon falling outside of a 10-minute walk from the site. This serves to artificially and erroneously inflate the accessibility score for the Site.
- **Ignoring the availability / potential for safe, attractive connections** - The methodology applied pays no attention to the availability of safe, accessible connections to core facilities in determining its accessibility score.

Yet in the case of Neatham Down Farm, the report identifies the ability to deliver 'high-quality' walking and cycling routes as an 'opportunity' and notes 'no constraints' in relation to active travel and public transport. This is patently not the case, given the rather obvious constraints facing the site to achieve any meaningful connectivity to Alton owing to its isolation, the A31 dual carriageway and the very limited public access routes.

The South Medstead team is familiar with this area. There is very limited potential to deliver walking and cycling routes to Neatham Down Farm of any quality and to address the severance issues associated with the A31 and its isolation from the communities of Alton. This undermines the potential for sustainable development of the Site and the core soundness of the Site being identified for allocation.

An objective assessment identifies:

- The route between the Neatham Down Farm site and Mill Lane (via the Golden Chair Farm A31 bridge, Lynch Hill site and Waterbrook Road) is not public highway or part of the Public Rights of Way network – Neatham Down Farm does not therefore benefit from any extant pedestrian or cycle connections via this route. The reliance on land outside of the allocation and promoters control represents a critical soundness risk.
- The quality of any connection that could be achieved is limited, with plans for the Lynch Hill site not including any suitable walking / cycling route between the A31 bridge and Mill Lane.
- Even if a suitable pedestrian and cycle route was achievable between Neatham Down Farm and Waterbrook Road, Waterbrook Road is not adopted and does not benefit from any Public Right of Way connecting to B3004 Mill Lane. It cannot therefore be relied upon for public pedestrian and cycle access in perpetuity to Neatham Down Farm
- There are no wider opportunities for connectivity through the Public Rights of Way Network.
- Montecchio Way is also highly constrained due to the lack of existing provisions, construction of a vehicular access into Lynch Hill (with no provision for pedestrians and cyclists), and the presence of the rail and river bridges and reduced highway boundary width. It does not appear feasible to deliver suitable connections, let alone attractive or high-quality ones.

Even based on EHDC's assessment, Neatham Down Farm scores relatively poorly on accessibility, and below that of the growth opportunity at South Medstead, which in all key facets is a better opportunity.

Notwithstanding this, taking account of the errors and omissions identified, our estimation of a more objective scoring of the sites would be:

- The accessibility score for South Medstead should increase, from an average of 9 to 13.
- The accessibility score for Neatham Down Farm should reduce from an average 8 to 3.



## SECTION 1 Introduction and Context

- 1.1 East Hampshire District Council (EHDC) is preparing its Local Plan 2021 -2040, which will need to deliver significant numbers of new homes before the end of the plan period (some 3,400 homes total by 2040 or ~400 homes each year during the plan period). EHDC launched Part 2 of the Local Plan Regulation 18 consultation on 22 January 2024 until 4 March 2024.
- 1.2 This Technical Note responds in relation to transport matters on behalf of Cala Homes, Bargate Homes and Bewley Homes who are collectively promoting land at South Medstead for a residential-led mixed use development as illustrated on **Image 1**.

**Image 1 – South Medstead Large Development Sites**



- 1.3 Earlier representations were made by Cala, Bargate, Bewley, Redrow and NW Read & Co in response to Part 1 of the Local Plan Regulation 18 consultation in January 2023. At the time, the collective land interests were expected to yield some 1,062 dwellings alongside employment uses (at Five Ash Crossroads) and the regeneration and expansion of the established local centre at Lymington Barns – this was across sites known as ‘South Medstead’ and ‘Land West of Lymington Bottom Road’ (collectively ‘the Sites’). A primary school facility was also expected to be delivered with the final location subject to further work / engagement with EDHC and Hampshire County Council (HCC) as Education Authority.

- 1.4 At that time, EHDC had encouraged the various promoters to work together to consider the potential for a singular, cohesive strategic development approach in South Medstead. Bewley, Cala and Bargate continue to work together collaboratively to achieve this vision.
- 1.5 EHDC has tested various options for growth across the District – including in Four Marks and Medstead – through the Local Plan process and the following supporting transport evidence base is relevant:
- 1 The Draft Local Plan Transport Background Paper – January 2024; and
  - 2 East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology Reports 1 & 2 prepared by Ridge and Partners LLP – January 2024.
- 1.6 The South Medstead Sites are assessed separately within those documents under the following EDHC Land Availability Assessment (LAA) references
- **LAA/MED-026 ‘Land West of Lymington Bottom Road’** – 505 dwellings across the Bewley Parcel; and
  - **LAA/MED-027 ‘South Medstead’** – 425 dwellings across the CALA Homes and Bargate Parcels.
- 1.7 Taking account of the comprehensive promotion that has been carried out across the collective land interests over the last 18 months, the EHDC assessment of the Site in part fails to understand and properly appraise the collective opportunity presented in South Medstead.
- 1.8 The Sites are not subsequently included as draft allocations within the latest version of the emerging Local Plan. Instead in this locale the emerging Local Plan identifies strategic development at Neatham Down Farm, east of the A31 outside of Alton.
- 1.9 This note has been prepared collaboratively by i-Transport and Pegasus Group on behalf of the promoters of the South Medstead Sites, to present an assessment of the above evidence base documents. This assessment concludes that the Sites present an appropriate option for suitable and sustainable growth in the District, over and above what can be achieved across the draft allocated sites, and in particular the suggested strategic allocation for 1,000 homes at Neatham Down Farm in Alton.

## SECTION 2 Emerging Local Plan Transport Evidence Base Review

### 2.1 East Hampshire Living Locally Accessibility Study

#### Overview

2.1.1 This Report was prepared by Ridge & Partners LLP on behalf of EHDC to inform the emerging Local Plan. The Report sets out that it has been prepared to address the following questions from EHDC regarding growth in the District:

- ***How should the concept of 20-minute neighbourhoods be applied to East Hampshire settlements, if at all? (EHDC QUESTION 1)***
- ***Which parts of the Council's planning area where land is promoted for residential development have the greatest potential to support increases in the use of sustainable transport modes (public transport, walking and cycling) over the plan period? (EHDC QUESTION 2)***
- ***Which parts of the Council's planning area where land is promoted for residential development have the least potential to support increases in the use of sustainable transport modes over the plan period? (EHDC QUESTION 3)***
- ***What are the opportunities and constraints for connecting to pedestrian, cycle and public transport infrastructure for each of the potential development sites identified within the Council's reasonable alternatives for its Local Plan spatial strategy? (EHDC QUESTION 4)***

#### Assessment Methodology

2.1.2 The assessment of sites has been undertaken using a 'Local Settlement Area Accessibility Tool' (LSAAT) which is not an industry recognised tool, but rather a scoring methodology that has been developed by Ridge in consultation with EHDC and HCC. The Report sets out that:

*"The LSAAT scores accessibility by active travel modes (walking and cycling, considered the most sustainable and preferred modes for local travel), whilst also considering accessibility to public transport nodes (bus stops and railway stations)"*

2.1.3 The role of this work is to identify sites with the highest potential to enable 'local living' – i.e. having good proximity to daily facilities. As the LSAAT is a bespoke assessment and not a standard methodology it is inevitable that it will be influenced by subjective bias from the assessor(s).



- 2.1.4 Using the LSAAT, the District (excluding the South Downs National Park authority area) has been split into 500m wide hexagons (representing a 'honeycomb' grid pattern) and each hexagon has been given a score based on the availability of services and facilities within a 10-minute walk and cycle from its central point. The methodology therefore does not provide scoring based on the practical accessibility of these services, only the distance from the LAA sites. This is a significant weakness in the overall assessment, as it can only assume that suitable connections to the identified services and facilities are available or can be delivered. This will not be the case for all sites, including Neatham Down Farm which is discussed further in this Report.
- 2.1.5 The LAA Sites have been assessed through this methodology and ranked by their respective scoring. EHDC has then selected 65 of the LAA Sites for further assessment (referred to as the 'Development Options' (DO)) which – based on the methodology as presented – has located ten DO sites which have the highest scoring accessibility. These sites are in Bordon, Horndean and Rowlands Castle, Alton and Four Marks. As set out in the Report, it is noted that the relative scoring of a site does not determine whether development should or should not be allocated in a given location, but it informs the Local Plan decision making process with respect to the existing accessibility of an area. The Report also seeks to identify transport measures to improve accessibility albeit at a very high level as discussed later within this Note.
- 2.1.6 A further assessment is also presented within the Report which assesses sites that are within 400m of a regular bus service and/or Local Cycling and Walking Infrastructure Plan (LCWIP) route and will benefit from future investment.
- 2.1.7 Following the above assessments (LSAAT and public transport/LCWIP), each site is given a minimum, maximum and average 'living locally' score (the average of the minimum and maximum) which is based on the accessibility to the daily facilities as set out in **Image 2.1** below (direct extract from the Accessibility Study).

**Image 2.1: Daily Facilities**

Source: Ridge and Partners LLP

- 2.1.8** The 'living locally' accessibility scoring is based on the total number of each type of daily facilities within each isochrone of each hexagon (a 10-minute walking and cycling time). The maximum score is 100 for each type of daily facility and the count of facilities is capped at three. Weighting has been applied for certain types of daily facilities, for example within 'Caring' a health centre or pharmacy scores higher than a tennis facility or golf course. The weighting is provided within Figure 3.2 of the Report.
- 2.1.9** Critically, as highlighted in a footnote in the Report on page 47, the assessment and scoring only recognises services and facilities which are extant, i.e. not those which are planned but that have not been delivered. This is a further significant flaw of the entire assessment and resulting scoring of sites as strategic sites, such as those proposed by Cala Homes, Bargate and Bewley, which have the opportunity to provide important (and high scoring) facilities alongside housing, such as a new primary school to serve Medstead and Four Marks.
- 2.1.10** In summary, the following concerns with the LSAAT methodology are raised:
- It is a bespoke assessment with inevitable subjective bias from the assessor(s);
  - The scoring method is based on proximity / distance of sites from identified local services and facilities and therefore assumes that suitable connections to the identified services and facilities are available from all sites (or can be delivered) – this will not be the case for all sites, including Neatham Down Farm; and

- The assessment only recognises extant services and facilities and not those which are planned but yet to be delivered. This does not reflect the opportunities for strategic sites to deliver facilities alongside housing.

## **SECTION 3      South Medstead and Land West of Lymington Bottom Road Sites Assessment**

3.1      The sites have been assessed individually as opposed to as a cohesive development as encouraged by EHDC previously. This is not appropriate as it does not recognise the benefits of larger, well connected schemes such as the provision of services and facilities alongside houses such as a new school proposed as part of the Sites. Regardless, the scoring of each of the South Medstead and Land West of Lymington Bottom Road sites has been reviewed and comments are provided below.

### **3.2      LAA/MED-026 Land West of Lymington Bottom Road Scoring Review**

3.2.1    The Land West of Lymington Bottom Road site is assessed as a 'DO' site in the report, i.e. a site EHDC has selected from the LAA Sites for further assessment. This site has achieved an average accessibility score of 9 (minimum of 5, maximum of 12 with a range of 7). The scoring is based on the accessibility appraisal of the site as outlined above which is included at **Appendix E** of the report. There are concerns with the scoring of the following types of facilities and services:

- **Supplying**
  - The site has not scored any points against this category despite there being a grocers (which operates locally as a convenience store selling locally produced bread and baked goods and milk/dairy products as well as fresh fruit and vegetables) and a butchers which sells meat, delicatessen and fresh pies and pastries and other store cupboard essentials located at Lymington Barns. These facilities provide a valuable opportunity to buy essential goods locally and within a walking and cycling distance from the site.
  - The assessment also does not appear to recognise that the Nosh Café and Bar provides a local food and drink takeaway service, offering breakfast, lunch and takeaway pizzas – takeaway outlets are a recognised facility within the supplying category.
  - Five new shops are currently under construction at Lymington Barns, which will include new occupiers within the 'Supply' section.



- **Caring**
  - The site is directly adjacent to Mansfield Park Surgery but is also within a 10-minute walk of Medstead Osteopathic Practice, Medstead Physiotherapy and Sport Injury Clinic and Mansfield Park Physiotherapy which does not appear to have been considered within the assessment.
  - There is currently an undetermined planning application for the provision of a new Hombu (Gymnasium) for Four Marks Martial Arts Academy at Lymington Barns, which also has interest for dual use as a gymnasium.
  - Similarly, the South Medstead masterplan includes provision of new playing pitches.
- **Learning**
  - As outlined above, the sites provide an opportunity to provide a new school for the Medstead and Four Marks area. This represents a significant opportunity to provide a betterment over the existing school location on Kitwood Road and would significantly increase the overall scoring of the site.
  - In any case, Four Marks Church of England Primary School and Medstead Church of England Primary School are both available within a 10-minute cycle from the centre of the site which is an achievable cycling distance for most people. Both schools take both infant and junior age groups.
- **Enjoying**
  - The Sites score no points for facilities and services other than indoor meeting places. This is not correct as the Nosh Café and Bar located at Lymington Barns is within a 10-minute walking and cycling distance – cafes/bars are a recognised facility within the enjoying category.
  - The emerging masterplan for South Medstead also includes a range of new facilities within the Local Centre, including a public house.

3.2.2 Land at Neatham Down Farm has none of these advantages.

3.2.3 Based on the above, the Land West of Lymington Bottom Road site should have scored significantly more favourably in the assessment with a more appropriate, objective average score of 13. With the addition of a school within the collective sites as intended by the Promoters, the site would represent an entirely accessible site which provides residents with a good opportunity to 'live locally' for many day-to-day needs. The provision of a school and a range of new facilities would also benefit existing Four Marks and Medstead residents and result in 'trip banking' in the local area – i.e. existing residents would use their cars less to access schools. The benefits of strategic development at South Medstead extend to existing residents, rather than just mitigating new proposals which appears to be the approach of the emerging Local Plan for sites including Neatham Down Farm, which can only address its own needs in isolation.

### 3.3 **LAA/MED-027 South Medstead Site Scoring Review**

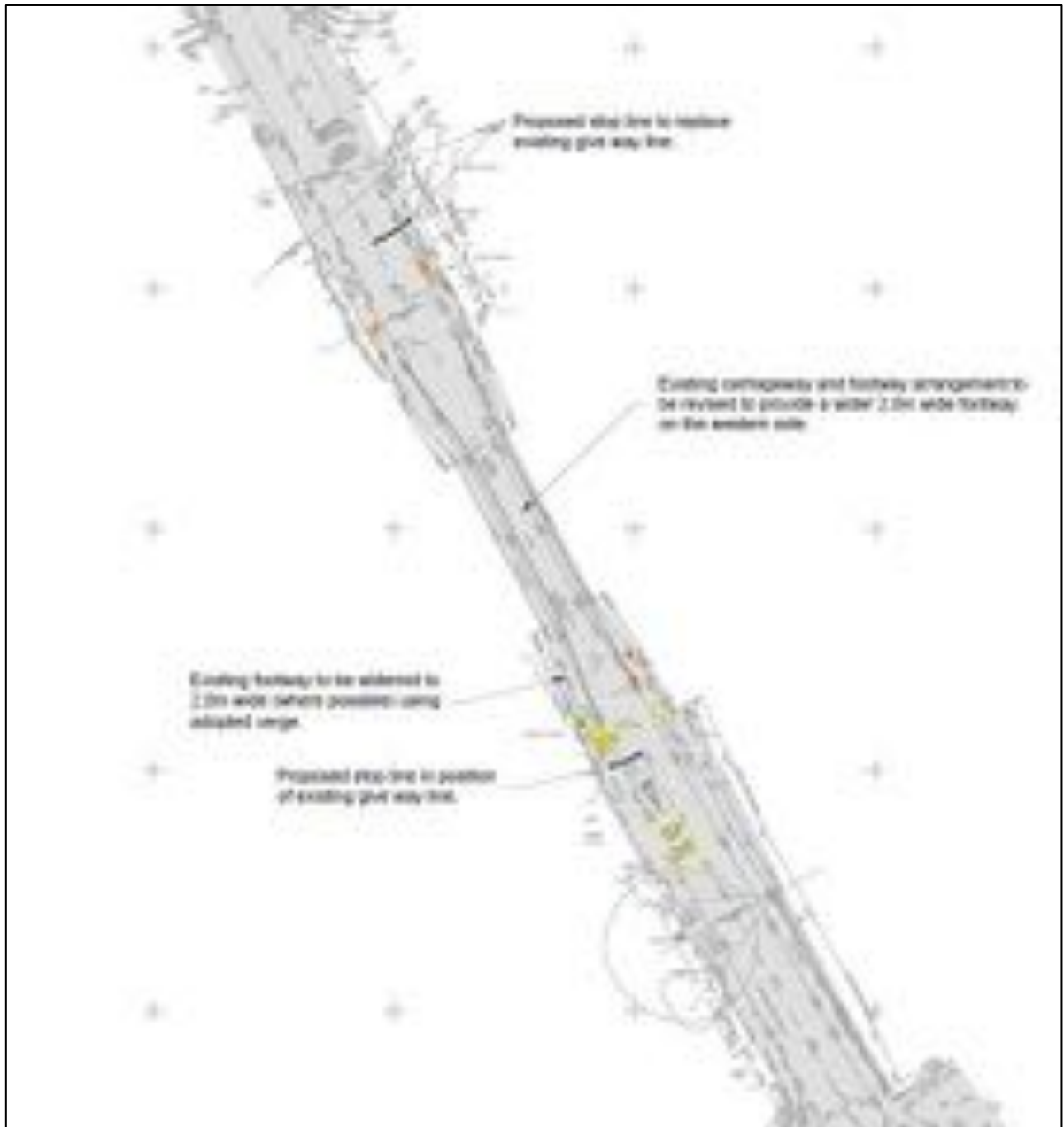
3.3.1 The assessment of the South Medstead site is not provided in detail within the Report as it has not been identified as a DO site by EHDC, somewhat perplexing given that it is part of a joint promotion. It does however, score identically to the Land West of Lymington Bottom Road site with an average accessibility score of 9 (minimum of 5, maximum of 12 with a range of 7) which is very likely due to the sites being located next to one another. The same comments and concerns listed above for the Land West of Lymington Bottom Road site with regards to the LSAAT assessment are relevant when considering the South Medstead site and therefore there is also concern that the South Medstead site has not been considered correctly or fairly.

#### **Opportunities for Active Travel**

3.3.2 When considering sustainable transport, Table 6.5 of the report sets out (superficially) that there are constraints with respect to 'Active Travel' and 'Public Transport' noting that the '*railway line is a barrier to movement*' and that there are no opportunities with respect to Active Travel or Public Transport. This is, on the face of it, inconsistent with how it deals with Neatham Down Farm, noting the A31 is a barrier to movement. It is also fundamentally incorrect and does not represent a fair assessment or the content of the promotion.

3.3.3 The promoters have carried out significant work to ensure that a connected and sustainable development can be delivered, including to engage public transport operators to develop improvement strategies, and to address any perceived severance associated with both the A31 and Watercress Railway Line through infrastructure improvements. This includes strategic improvements to pedestrian and cycle provision as well as to enhance connectivity. A scheme has been developed to demonstrate how safe and suitable pedestrian movement through the rail underbridge on Lymington Bottom Road can be achieved, as shown in **Image 3.1** below.

**Image 3.1: Lymington Bottom Road Pedestrian Scheme**



Source: Pegasus Drawing P20-3230 SK/01

**3.3.4** The scheme includes:

- The existing carriageway and footway arrangement under the bridge and also to the immediate south will be revised to provide a 2m wide footway on the western side using adopted highway land. This would also provide a significant benefit for existing users;
- Shuttle signals will be provided;



- The give way line south of the bridge will be replaced by a stop line, with updated road markings and an uncontrolled pedestrian crossing with dropped kerbs and tactile paving to be provided; and
- The give way line north of the bridge will be replaced by a stop line approximately seven metres to the north.

3.3.5 A scheme has also been developed to demonstrate how pedestrian movements can be accommodated across the Boyneswood Road rail bridge and at the A31 Winchester Road / Boyneswood Road junction, as shown in **Image 3.2** below.

**Image 3.2: Boyneswood Road / A31 Winchester Road Pedestrian Scheme**



Source: i-Transport Drawing ITB16527-GA-011

3.3.6 The scheme includes:

- Signalisation of the existing A31 Winchester Road / Boyneswood Road priority junction including controlled crossings on the northern and western junction arms;
- Widening of the existing footway on the western side of Boyneswood Road between A31 Winchester Road and the rail bridge to 1.8-2m; and
- Upgrade of the existing priority working arrangement across the bridge to a signal controlled arrangement, including the retention and potential widening of the existing footway across the bridge.

## SECTION 4 Neatham Down Farm Assessment

4.1.1 Neatham Down Farm has been identified within Regulation 18 Local Plan 2021 - 2040 as a strategic allocation for approximately 1,000 new homes. Neatham Down Farm is assessed within the accessibility report under reference LAA/BIN-011 (referred to as *Land at Neatham Manor Farm*) where it has an average accessibility score of 8 (minimum of 4, maximum of 18 with a range of 7).

4.1.2 Even without reasonable adjustment to the above South Medstead sites, Neatham Down Farm does not score as highly on accessibility, and below that of the South Medstead Sites.

4.1.3 Turning to the assessment of Neatham Down Farm specifically, the following concerns are raised:

- **Living**
  - Neatham Down Farm has erroneously positively scored against public transport. However, the closest existing bus stops are over a 10-minute walk from the western site boundary and further from the centre of the site.
- **Supplying**
  - Neatham Down Farm has scored against the Supplying category despite no facilities or services within this category being identified. Again, while there are Lidl and Aldi stores located to the west of Mill Lane, these are in excess of a 10-minute walk from the centre of the site. In addition, there are no post offices, convenience stores, takeaway outlets, bakeries or butchers within the 10-minute walking distance.
- **Learning**
  - Neatham Down Farm has scored on Learning based on 'Higher education establishments' being Eggar's School. However, this school is in excess of a 10-minute walk from the centre of the site and therefore should not have scored in any event.

4.1.4 The Neatham Down Farm site has been scored more favourably than it should be under an objective appraisal, noting that in any event it remains as scored lower than the South Medstead sites.

#### **Neatham Down Farm Active Travel Constraints and Opportunities**

4.1.5 Table 6.5 of the report sets out that there are no constraints with respect to 'Active Travel' and 'Public Transport' for the Neatham Down Farm site, conversely suggesting that there are opportunities for both. It does note that the A31 is a barrier to movement but does not provide further detail.

4.1.6 The below **Image 4.1** is an extract from the Regulation 18 Local Plan which identified '*Constraints and Opportunities*' associated with the Neatham Down Farm site including access for all modes (vehicles, pedestrians and cyclists).

#### **4.1.7 Image 4.1: Neatham Down Farm Local Plan Figure**



4.1.8 The image and Local Plan text indicates '*potential*' to provide pedestrian and cycle links across the A31 over an existing bridge which leads to Golden Chair Farm and connection via the A31 / B3004 Montecchio Way roundabout to the Public Right of Way Footpath to the north west of the roundabout. On review, neither of these routes appear deliverable for the reasons described below and therefore cannot be relied upon to demonstrate the practical accessibility of the site. The constraints highlighted below serve to demonstrate that there is very limited potential for any 'attractive' sustainable connections to be delivered and the LSAAT assessment is incorrect to consider there to be no constraints in this regard, only opportunity.



### **Golden Chair Farm Bridge**

- 4.1.9 There is an existing accommodation bridge across the A31 which leads to Golden Chair Farm from Waterbrook Road via an access track through the Lynch Hill site to the west of the A31 - this route is not public highway or part of the Public Rights of Way network and Waterbrook Road is also not public highway. There are no public rights available here until Mill Lane. The bridge and the connection to Mill Lane is outside of the allocation area and beyond the control of the promoters.
- 4.1.10 Further, the Lynch Hill site has outline planning permission (planning reference 49776/004) for employment units which retains a re-aligned access from Waterbrook Road and provides a new priority junction access from B3004 Montecchio Way. A reserved matters application was submitted in June 2023 for the site (planning reference 49776/006) and the application material and proposed layout does not provide any indication of delivering dedicated walking and cycling routes between Neatham Down Farm via the Golden Chair Farm bridge and Waterbrook Road.
- 4.1.11 Even if a suitable pedestrian and cycle route was achievable between Neatham Down Farm and Waterbrook Road, which would rely on fundamental changes to the Lynch Hill scheme, Waterbrook Road remains unadopted and does not benefit from any Public Right of Way connecting to B3004 Mill Lane. Opportunities for improvements between the access track through Lynch Hill leading to the bridge and Mill Lane are also limited due to the River Wey bridge and associated parapets, the limited width of the existing footway on the southern side of the carriageway and significant on-street parking resulting from the surrounding commercial and industrial units.
- 4.1.12 Therefore, any connection in this location is highly uncertain and unsecure at this stage, and in any event would be highly compromised by the quality of the existing connectivity at Waterbrook Road and the passing through of an active employment area.

### **PROW Connection via A31 Roundabout**

- 4.1.13 Opportunities to connect to the Public Rights of Way Network across the A31 Roundabout are equally as limited and likely undeliverable as the Golden Chair Farm A31 bridge route described above.
- 4.1.14 Despite the Local Plan figure (**Image 4.1** above) indicating a Public Right of Way connection across the A31 Roundabout, this does not appear on the definitive Map provided by HCC, extracted as **Image 4.2** below. On this basis, the Local Plan figure is not correct and cannot be relied upon. This is a fundamental principle of the emerging allocation that remains highly uncertain and unanswered.

**Image 4.2: A31 Roundabout Public Right of Way Extent**



Source: Hampshire County Council PROW Definitive Map with Consultants annotation

### **Wider Opportunities**

- 4.1.15** A wider review for pedestrian and cycle connectivity from Neatham Down Farm to local services and facilities has been undertaken, namely the potential use of via Montecchio Way, assuming that a safe and suitable connection could be achieved across the A31 roundabout (which is yet to be demonstrated). This review has identified various significant and additional constraints with respect to providing connectivity via Montecchio Way which currently does not provide footways or cycleways in this area, likely due to the identified constraints.
- 4.1.16** Firstly, the Lynch Hill employment development site (as permitted) provides for a new vehicular access from Montecchio Way, approximately 140m west of the A31 Roundabout. The consented access design does not provide footways and / or cycleways across the site access junction and the large junction radii necessary to accommodate large delivery vehicles would make delivery of a crossing across the junction difficult and potentially unsafe. This is demonstrated via **Image 4.3** below which shows the proposed access design for Lynch Hill from Montecchio Way. Ground levels adjacent to the junction are significant and limit what could be achieved and delivered.

**Image 4.3: Proposed Lynch Hill Montecchio Way Access**



Source: Calibro Drawing 90-110 with Consultants annotation

**4.1.17** The impending highway improvement works at the Montecchio Way / Mill Lane priority junction also represent a significant constraint in delivering meaningful pedestrian and cycle improvements along the Montecchio Way corridor. Under planning application 57035, land at the junction of Montecchio Way and Mill Lane is being developed to provide a Lidl foodstore. The planning permission includes an obligation (secured via the Section 106 legal agreement dated 14 September 2021) to 'improve' the Montecchio Way / Mill Lane junction via signalisation of the junction which appears to have been secured for capacity-led reasons. The arrangement for the improvement works is shown in **Image 4.4** below.



**Image 4.4: Montecchio Way / Mill Lane Lidl Improvement Scheme**



Source: Scoot White and Hookins Drawing 303146-SWH-XX-XX-DR-C-822-P01

4.1.18 The above scheme does not provide a sufficient east-west pedestrian route on Montecchio Way suitable to accommodate daily pedestrian demand likely to arise from a strategic development at Neatham Down Farm. The scheme does not include and pedestrian linkages to the east of the junction, nor across the junction itself and only limited pedestrian connections to the west which is likely reflective of the identified constraints in providing such a facility including adjacent levels. This is supported by HCC who as local highway authority commented on the Lidl application (consultation response dated 20 May 2020), including the above improvement scheme and pedestrian connections which noted (page 3):

***This footway route has varying levels and a wider shared footway/cycleway provision cannot be provided without the requirement for elements of retaining structures. The footway width on the corners of both the Mill Lane/Montecchio Way and London Road/Garstons Way/Montecchio Way junctions may need to be reduced due to the levels.***

4.1.19 In addition, there is a bridge which crosses the River Wey to the west of the new Lynch Hill access and a further bridge across the railway line to the west of the Montecchio Way / Mill Lane junction. Both bridges represent constraints to delivering pedestrian improvement schemes as the width of the adopted highway in this area reduces to the width of carriageway and surfaced margins between the bridge parapets – this does not provide sufficient space to provide a pedestrian and cycle route along Montecchio Way of any quality, and would comprise a constrained and substandard connection even if a connection could be made. These areas are shown on **Image 4.5** below together with the highway boundary information.

**Image 4.5: Montecchio Way Restricted Highway Width**



Source: Hampshire County Council with Consultants annotation

4.1.20 Because of the restricted widths across the bridges on Montecchio Way, any pedestrian and cycle connections here will be of a reduced width, if deliverable at all.

4.1.21 Alternatively, the construction of a new pedestrian cycle bridge in this location is unlikely to be feasible given the scale of development proposed. Reliance on such an approach would not be a sound approach to advancing a Local Plan. Further assessment would be required before it could be considered deliverable. The Inspectors considering the Stroud Local Plan have recently recommended that it be withdrawn given reliance provision of new infrastructure in similar circumstances.

**Neatham Down Farm Active Travel Constraints and Opportunities Summary**

4.1.22 In summary, the following constraints with respect to delivering active travel connections to and from the Neatham Down Farm site are identified:

- The route between the Neatham Down Farm site and Mill Lane (via the Golden Chair Farm A31 bridge, Lynch Hill site and Waterbrook Road) is not public highway or part of the Public Rights of Way network – Neatham Down Farm does not therefore benefit from any extant pedestrian or cycle connections via this route. The reserved matters planning application for the Lynch Hill site does not include a walking and / or cycling route through the site between the A31 bridge and Waterbrook Road / Mill Lane.
- Even if a suitable pedestrian and cycle route was achievable between Neatham Down Farm and Waterbrook Road, Waterbrook Road is not adopted and does not benefit from any Public Right of Way connecting to B3004 Mill Lane. It cannot therefore be relied upon for public pedestrian and cycle access in perpetuity to Neatham Down Farm
- Montecchio Way is also constrained with respect to opportunities to deliver a walking and cycling route to Neatham Down Farm due to:
  - the lack of existing provisions;
  - construction of a vehicular access into Lynch Hill which does not provide pedestrian and cycle infrastructure or a crossing of the Lynch Hill arm of the junction;
  - The extant scheme to signalise the Mill Lane / Montecchio Way junction which does not provide an east-west crossing and there is no certainty with regards to delivery of the shown pedestrian route on the scheme drawing; and
  - the rail and river bridges and reduced highway boundary width in these areas which reducing available width for pedestrian and cycle schemes in these areas.

4.1.23 It is considered by i-Transport and Pegasus that simply using the existing infrastructure at South Medstead even without physical improvements to the network there to serve new development would be better than creating and encouraging new, unproven and constrained walking and cycling routes to serve Neatham Down Farm.



## SECTION 5 Summary

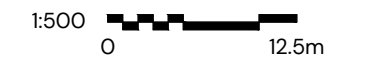
5.1.1 EHDC launched Part 2 of the Local Plan Regulation 18 consultation on 22 January 2024 until 4 March 2024 which included the 'Living Locally Accessibility Study' prepared by Ridge and Partners LLP on behalf of EHDC. The study attempts to review areas where the LAA sites are located with respect to their existing level of accessibility to existing local services and facilities.




5.1.2 As a result of the assessment, the South Medstead and Land West of Lymington Bottom Road were assessed and achieved an average 'living locally' score of 9. However, there are concerns with the scoring methodology approach as follows:

- The scoring does not fully recognise the existing level of local facilities and services in the area;
- The scoring does not recognise in any capacity the intention to deliver a school and associated benefits to residents of the development and surrounding area through trip banking; and
- On the basis of the above points, the Sites should have scored more favourably.

5.1.3 Concerns are also raised with respect to the scoring of the Neatham Down Farm site which appears to have been scored more favourably than other sites. Regardless, the given score is lower than the South Medstead and Land West of Lymington Bottom Road and it is therefore the selection of the Site to deliver strategic growth in the Alton area would not represent a sustainable development option. Additionally, the deliverability of suitable pedestrian and cycle connections to the local area from Neatham Down Farm are highly questionably and un-evidenced, given availability of land and relying on neighbouring, privately owned land parcels to delivery connectivity which in any event are sub-standard.

## **DRAWINGS**



- Key:
-  Signal Head
  -  Extent of Adopted Highway
  -  Uncontrolled Crossing with Tactile Paving



REV	DATE	DESCRIPTION	REVISED BY	APPROVED BY

**PROPOSED MITIGATION AT  
BRIDGE NARROWING**

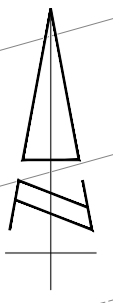
**LYMINGTON BOTTOM ROAD  
MEDSTEAD**

CLIENT: BEWLEY STATUS: INDICATIVE

DATE: 20/02/2024 SCALE: 1:500 DRAWN/CHECKED BY: LT/AS APPROVED BY: CMR

JOB NUMBER: P20-3230 DRAWING NUMBER: SK/01 REVISION No: - **PEGASUS GROUP**





TIE INTO EXISTING FOOTWAY

3.7m WIDE CARRIAGEWAY

2.0m FOOTWAY OVER BRIDGE

1.8m SECTION OF FOOTWAY

EXISTING FOOTWAY WIDENED TO 2.0m

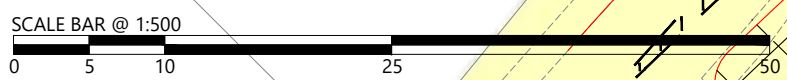
EXISTING PEDESTRIAN CROSSING TO BE REALIGNED

EXISTING FOOTWAY REALIGNED AND WIDENED TO 2.0m

NEW SIGNALISED PEDESTRIAN CROSSING

NEW SIGNALISED PEDESTRIAN CROSSING

Tedesco



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CLIENT:  
CALA HOMES (THAMES) LTD & BARGATE HOMES

REV	DATE	BY	DESCRIPTION	CHK	APD

STATUS: FOR INFORMATION

DRAWN: SH	CHECKED: DE	APPROVED: TW
PROJECT No: ITB16527	SCALE @ A3: 1:500	DATE: 28.02.24
DRAWING No: ITB16527-GA-011		REV:



The Square, Basing View,  
Basingstoke, Hampshire, RG21 4EB  
www.i-transport.co.uk  
Tel: 01256 898366

TITLE:  
SIGNALISED SHUTTLE WORKING ARRANGEMENT -  
NORTH OF A31 / BOYNESWOOD ROAD JUNCTION

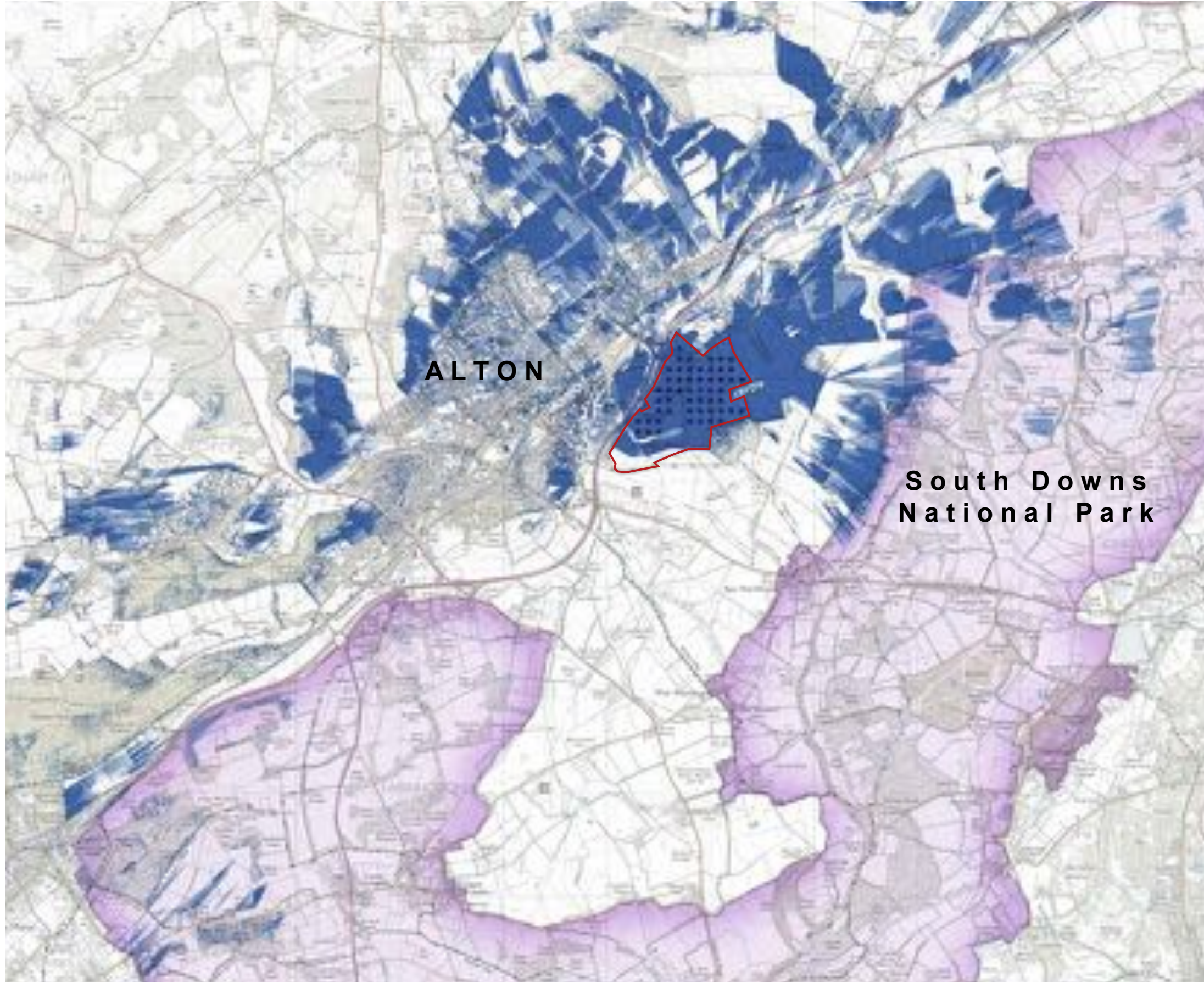
PROJECT:  
LAND AT FIVE ASH ROAD, FOUR MARKS

TV:Project\16000\_Series\16527\16527-011.dwg

## Appendix 4: ZTV Landscape Sensitivity Analysis

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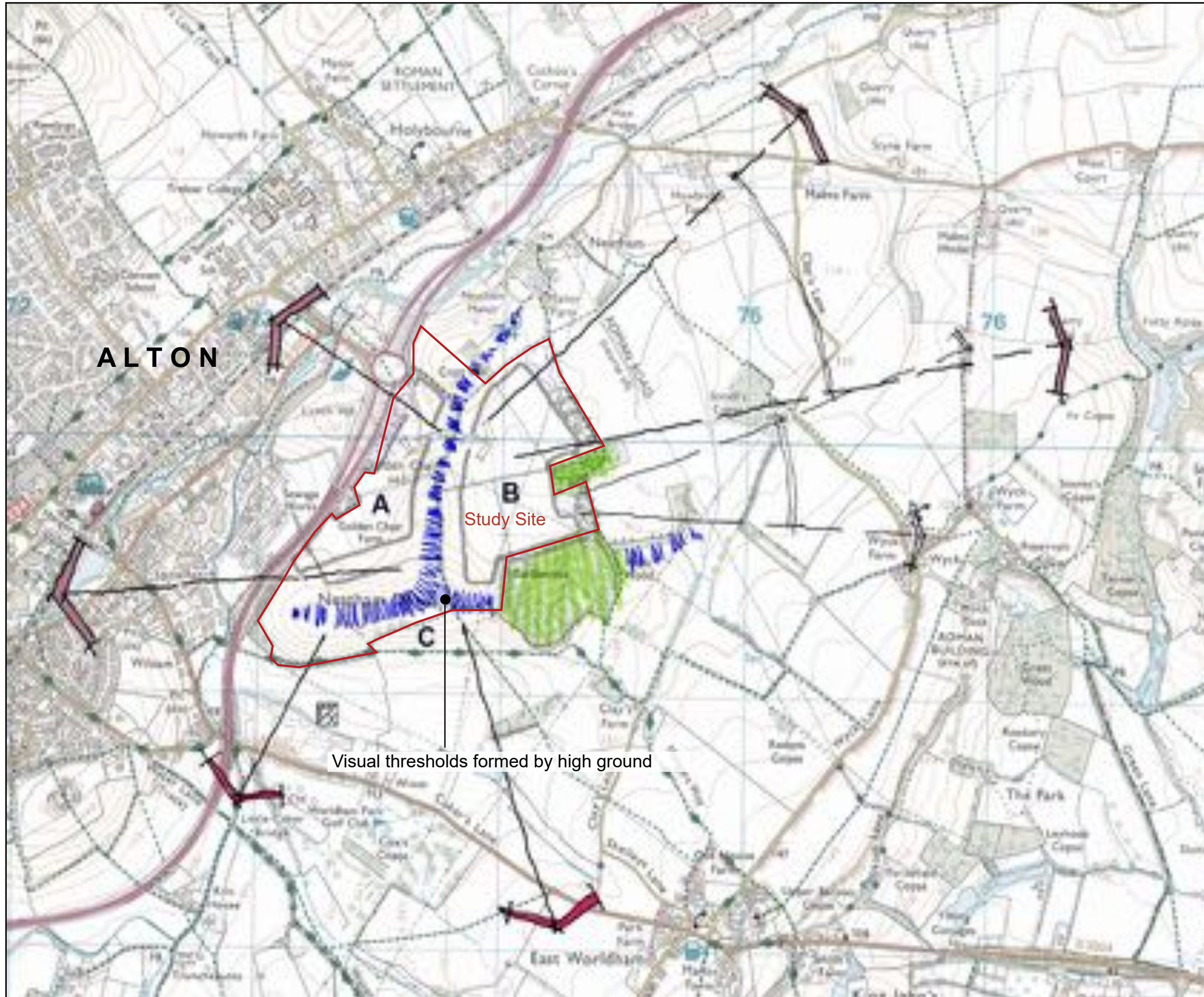


**Landscape & Visual: Key Site Findings**

The ZTV study shows the locations from which housing (9.5 m height) on the Neatham Down site would have uninterrupted and partially filtered views







### Landscape & Visual: Key Site Findings

The site's distinctive rolling topography result in it having three very different character areas

**Character Area A:** Given this area's west facing aspect the area relates strongly with the adjoining Alton urban area

**Character Area B:** Given the saddle of high ground to the west, Monks Wood to the south and its gently sloping north-easterly aspect this area relates to the rolling arable landscape to the north and northeast. Importantly, in walking this area it is evident the landscape has no interrelationship or intervisibility with Alton.

**Character Area C:** This steeply sloping relatively thin piece of land faces west. Given the areas topography the area's principle interrelationship is with the landscape to the north but it also has some interrelationship and intervisibility with Alton town.



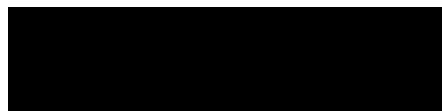


6<sup>th</sup> March 2024

REF: BR/eds



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By email only

Dear Planning Policy Team,

**Our Local Plan 2021-2040: Regulation 18 Consultation – Land at Five Ash Crossroad, South Medstead (LAA/MED-009)**

I write on behalf of NW Read & Co (NWR) who have been promoting land for economic development at Five Ash Crossroads. They also own and operate Lymington Barns Local Centre, which is currently undergoing a programme of renewal, including investment in new business premises. NWR have extensive experience of delivering and operating economic development within the local area. They welcome the recognition of Lymington Barns as a defined Local Centre, within the emerging Local Plan. This follows similar designation within the Four Marks and Medstead Neighbourhood Development Plan. It will provide further confidence to invest in new facilities locally, alongside the delivery of new homes at Land West of Longbourn Way. This is a suitable and sustainable location for growth which will support investment locally.

Land at Five Ash Crossroads also forms part of a more strategic promotion proposal which collectively includes LAA/MED-026 and LAA/MED-027, and forms the subject of separate Representations. NWR are supportive of the strategic promotion of the land which provides the opportunity to deliver a sustainable expansion of the settlement alongside significant investment in new services, facilities, Green and Blue Infrastructure, and social infrastructure. This will benefit both new and existing residents in the area. However, this Representation seeks to focus on issues relating to economic development.

*Spatial Strategy and Settlement Hierarchy*

The emerging plan recognises that there is demand for additional employment floorspace in the area to meet the need of existing business and to cater for new businesses<sup>1</sup>. However, the objective set out therein is more akin to a consolidation rather than positive approach to growth by retaining existing employment sites and encourage the implementation of both extant planning permissions and historic allocations. This appears to be in preference to introducing a diversity in the choice and opportunity for new locally appropriate allocations within the Plan, such as at Four Marks and South Medstead. The preferred strategy is a homogenous approach which acts as a constraint to the delivery of more sustainable communities.

---

<sup>1</sup> Paragraph 3.27

Similarly, the Settlement Hierarchy presented in the Consultation is the latest iteration of a hierarchy based on the evidence base of the day. The iterative nature of the Plan progress has seen Four Marks and South Medstead yo-yo between tiers. Representations are made on behalf of others in respect of the detail of the most recent evidence base, including the Accessibility Study<sup>2</sup> and Settlement Hierarchy Background Paper (January 2024), but in the context of economic development and enhancing local services and facilities which underpin the evidence base, it is surprising that a more supportive approach to the delivery of such a form of development is not set out. This includes an allocation for employment provision at Five Ash Crossroads. Doing so would make a positive contribution to the ability of residents to live locally, providing opportunities to support working from home, as well as working near home. Whilst Four Marks and South Medstead is already a sustainable location to support additional housing growth, the housing focused approach of the Local Plan should not disregard opportunities to promote further employment provision.

The focus in setting the Spatial Strategy (Policy S1) in accordance with the Settlement Hierarchy (Policy S2) is housing growth, which is understandable, but creates an impasse that lower tier settlements receive a proportionate level of housing growth because of the relative services and facilities, but nothing further. This incremental approach lacks the benefit of looking more holistically and taking opportunities, and will result in a logarithmic pattern of growth.

*Local Plan Objective A2*

Local Plan Objective A2 relates specifically to economic growth, stating that the Plan will:

*‘Provide a sustainable level of economic growth to ensure that local people of all ages can access employment. The Local Plan will:*

- a) Identify and maintain a flexible and varied supply of land buildings for business that is the right type and in the right location, including the rural areas.’*

NWR have extensive experience of delivering and managing commercial property within East Hampshire, particularly in and around Four Marks and South Medstead. There is demand for new, locally appropriate, work space. The Local Plan, as currently drafted will not support investor confidence in pursuing economic investment to meet the existing demand. This is supported by national census travel to work data, which identifies that a large proportion of working people work locally. Table 1, below, provides a comparison of travel to work data between 2011 and 2021.

Table 1: MSOA Medstead Travel to Work		2011				2021			
miles	TOTAL (working people)	5347		Accumulation	Accumulation %	6139		Accumulation	Accumulation %
	WfH	1195	22.3%	1195	22.3%	2833	46.1%	2833	46.10%
	Unfixed location (including hybrid)	508	9.5%	1703	31.8%	877	14.3%	3710	60.4%
1.25	<2km	502	9.4%	2205	41.2%	204	3.3%	3914	63.8%
1.25-3.1	2km to <5km	0	0.0%	2205	41.2%	209	3.4%	4123	67.2%
3.1-6.2	5km to <10km	816	15.3%	3021	56.5%	496	8.1%	4619	75.2%
6.2-12.4	10km to <20km	748	14.0%	3769	70.5%	620	10.1%	5239	85.3%
12.4-18.6	20km to <30km	502	9.4%	4271	79.9%	452	7.4%	5691	92.7%
18.6-24.8	30km to <40km	266	5.0%	4537	84.9%	253	4.1%	5944	96.8%
24.8-37.2	40km to <60km	49	0.9%	4586	85.8%	86	1.4%	6030	98.2%
37.2+	60km+	173	3.2%	4759	89.0%	109	1.8%	6139	100.0%

<sup>2</sup> East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology. Ridge and Partners LLP (2024)



There are a few things to note with the data in the table:

- The 2011 data has been extracted from Datashine Commute. It is based on Census Table WU03EW and is therefore consistent with the 2011 Census data. However, the benefit of Datashine Commute is that it undertakes a finer grain analysis of the information and plots the destination MSOAs for the workers. This provides further qualitative information that a large number of those people living in FM&M travel to work in the local area, including a large number in the neighbouring villages. This clustering in the local area highlights the appetite of residents to stay local. This is supported by the prevalent use of local services and facilities, including convenience retail.
- The use of Datashine Commute does create a small anomaly insofar as it does not record destinations where fewer than 6 people travel to. This results in an accumulation of only 89%. However, this is not statistically significant. It has also been benchmarked against the 2021 data. Which highlights a trend of more localised travel (or not travel) to work.
- The 2021 data is taken directly from the Census at dataset TS058. This accumulates to 100% and highlights a trend of significantly more home and hybrid working, at the expense of longer commutes. It is recognised that the pandemic did have an effect, but there is now evidence to support a longer-term trend.

The travel to work data supports the provision of more employment space locally, along with enhanced local services and facilities. It also indicates that, to address Local Plan Objective A2, an employment allocation should be included at Five Ash Crossroads.

This fits with the statistical analysis in the draft Plan, including that the vast majority of businesses in the District employ fewer than 10 people. An agile employment market which responds to local requirements. To do this effectively requires choice in the employment space market. There is currently none locally in the absence of a sufficient supply.

NWR consider that such employment provision is deliverable, adopting a local approach to delivery. They have extensive experience of doing so, including the ongoing investment of nearly £2m in the Local Centre at Lymington Barns to bring forward five new units. This sits alongside further planned investment to be delivered in conjunction with draft allocation West of Longbourn Way.

The economic development allocations included within the draft Plan are geared towards larger premises, principally coming forward as B8 uses, such as at Lynch Hill, do not meet the needs of the District. Instead, allocations should be included which are focused on Class E uses, replacing lost B1 spaces and suitable for smaller, more flexible, work forces which is where the demand is locally.

*Policy E1 – Planning for Economic Development*

Policy E1 appears to support the delivery of new economic development beyond the settlement boundary, within the countryside, where a need for development can be demonstrated at that location, as well as compliance with other policies.

However, NWR are concerned that the assessment of need in such circumstances lacks clarity and would be resisted in the context of a planning application. There has been clear evidence of local resistance to the delivery of new services and facilities locally, including recent applications to deliver facilities at Lymington Barns. That resistance comes irrespective of need. It is unlikely that E1, as currently worded, would generate sufficient investor confidence to pursue new economic development in such circumstances. Further allocations should be incorporated to ensure that there is a framework in which to deliver new premises at FM & SM.

*Policy E5*

NWR support the inclusion of Lymington Barns as a designated Centre in the Retail Hierarchy. This is consistent with the designation in the Neighbourhood Development Plan.

*Draft Employment Allocations*

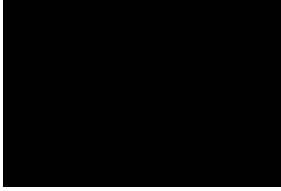
The inclusion of employment allocations are supported and will be necessary to underpin the economic strategy associated with the emerging Local Plan. However, there is some concern that there are insufficient allocations of the typology which reflect the local economic circumstances and could genuinely contribute towards a more sustainable pattern of development, reduce the need to commute (and reduce the flow of out commuters in the District), compliment trends in emerging work patterns (such as flexible spaces, neighbourhood provision to enable working near home etc) and genuinely support the walkable (20 minute) neighbourhood concept. Additional provision in Four Marks and South Medstead provides a genuine opportunity to do so.

Furthermore, some existing employment allocations lack robustness in underpinning a deliverable Local Plan, including major constraints such as flood risk across large areas and no sequential approach to the selection of the site and inclusion of typologies which are inappropriate for their location. In the north west of the District, the reliance on employment sites at Alton which have deliverability issues will act as a barrier to sustainable development and economic parity, let alone growth. It is considered that further allocations should be included to aid choice and to meet a wider range of needs in the employment market.

NWR would welcome discussion relating to locally appropriate solutions which are deliverable, moving forward.

Please do not hesitate to contact me should you wish to discuss any of the issues raised.

Yours faithfully





4<sup>th</sup> March 2024

REF: BR/eds

**Black Box  
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By email only

Dear Planning Policy Team,

**Our Local Plan 2021-2040: Regulation 18 Consultation – FMS1 Land West of Lymington Barn (LAA: MED-022)**

This Representation has been prepared on behalf of Redrow Homes (Southern Counties) ('Redrow'), who have a secured interest in the land West of Lymington Barns (also known as Land West of Longbourn Way). They are supportive of the inclusion of the site as an allocation in the emerging Local Plan. Accordingly, they look forward to engaging with officers to deliver the site for new homes within the District. It is currently subject to an undetermined planning application (Ref: 58788/002) which includes provision for up to 95 homes. It is a deliverable housing site in a sustainable location.

This Representation does not get drawn on the relative merits of the emerging spatial strategy or evidence base informing it because it is considered that any scenario should include development at Four Marks and South Medstead. It is an unconstrained settlement in planning terms and the benefits of additional development are potentially significant. The allocation site is well placed within this context to help support sustainable growth in the area.

**Draft allocation Overview**

The inclusion of land West of Lymington Barn is set out at emerging allocation FMS1. In doing so, it sets out a list of constraints & opportunities, a summary of reasons for inclusion and a list of infrastructure requirements.

*Opportunities and Constraints:*

Matters relating to biodiversity, nutrient neutrality, green infrastructure, access, noise and residential amenity are all matters which have formed the subject of further assessment, including as part of the current planning application. Redrow have assessed these constraints which, in general terms, are reasonably limited, through work to support the current planning application. They are supportive of the delivery of a development which respects the rural edge, introducing a large area of green open space, planting and provision of BNG. The latest BNG calculations when assessed against the illustrative masterplan for the site are well in excess of the required 10% gain. It makes a positive contribution to biodiversity enhancement and is reflective of the large provision of green infrastructure included within the emerging plan for the site.

In terms of access, it is considered that the allocation will not give rise to any unacceptable impacts on the local highway network. The inclusion of the Centre at Lymington Barns as a Local Centre, is welcome and will support the delivery of future investment there and help promote a more walkable neighbourhood. However, there remains a suitable route for carborne access to the site currently. Notwithstanding this, Redrow are working alongside the landowner to deliver enhancements to the route adjacent to the Local Centre and Longbourn Way, which will improve the existing situation. This is a positive approach.

*Summary of reasons for inclusion:*

Redrow are supportive of the reasons provided. The site is well-located relative to local services and facilities.

Whilst there are inconsistencies in the Ridge Accessibility Study, Redrow agree that the site will perform well and certainly above average in the Study.

*Infrastructure Requirements:*

Redrow are supportive of delivering infrastructure which is proportionate to the scale of development proposed, as directed by the Community Infrastructure Levy Regulations. A number of the items identified within policy FMS1 are subject to discussion as part of the current planning application, including healthcare provision. Four Marks is well served by two existing GP Surgeries. Of those two, Boundaries Surgery is identified for extension within the Local Plan. It is understood that funding has already been secured for the extension, which will create additional capacity within the surgery. In addition, Mansfield Park surgery is located adjacent to Lymington Barns Local Centre. It is understood that there is currently spare capacity there but, if not, Redrow are supportive of making a proportionate contribution to meet the needs of the development. Accordingly, the wording of the emerging allocation policy is appropriate.

As set out above, it is considered that the existing access arrangements via Longbourn Way will be enhanced to amend the geometry of the existing carriageway and to re-enforce pedestrian infrastructure and landscaping. This sits comfortably with a more holistic approach being taken to the Local Centre.

**Housing Requirement**

Redrow support the use of the standard methodology to derive housing requirement. It is agreed that there would not be any exceptional circumstances to depart from this. East Hampshire should be meeting its needs in full.

It is recognised that there are some challenges with reasonably disaggregating the Districtwide figure of 578 dwellings per annum (dpa), between the areas of the District which sit outside and inside the South Downs National Park (SDNP) respectively. However, it is considered that assigning 100dpa to the SDNP area of the District overstates the realistic contribution it will make. The evidence base currently directs that a figure between 25dpa and zero for the SDNP contribution is more realistic. Anything else is likely to be in conflict with the tests of soundness moving forward. In making this adjustment, it should be noted that housing requirements are expressed as minimum figures.

Accordingly, it places the Local Plan at greater risk by overstating components of supply, such as from the SDNP.

It is noted that FMS1 currently indicates a contribution of 90 homes. This could reasonably be amended to approximately 95 homes which have been proposed as part of the current planning application.

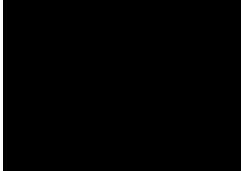
**Summary**

Redrow are supportive of allocation FMS1. It represents a suitable location to deliver a sustainable form of development, supporting the principles of and helping to create a more walkable neighbourhood in close proximity to a range of services and facilities.

There are not considered to be any barriers to delivery, which has been assessed alongside the detailed assessment of an outline planning application, which is currently being considered by the local planning authority.

Redrow look forward to working with officers moving forward to advance the Local Plan and deliver the proposal.

Yours faithfully





**Our Ref: 2020.006**  
**Your Ref:**

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4<sup>th</sup> March 2024

Dear Planning Policy Team,

**Re: East Hampshire District Draft Local Plan 2021-2040 Regulation 18 Consultation**

I am pleased to provide you with representations to the East Hampshire District Council Draft Local Plan 2021-2040 consultation on behalf of Bloor Homes Ltd. These representations are made with reference to Land East of Horndean (the site), which is being developed and promoted by my client. Land East of Horndean is allocated for housing and other mixed uses, as set out in Policy HN1 of the East Hampshire District Adopted Local Plan 2016 Housing and Employment Allocations (2016). A plan showing the location of the Land East of Horndean site is shown at Appendix A.

**Land East of Horndean**

Bloor Homes Ltd control the central and southern section of the allocation 'Land East of Horndean' which is subject to the following outline planning permission (55562/005):

*Outline planning [permission] with all matters reserved, except the means of access to the highway network (junction arrangements) and associated highway improvements, for the demolition of existing buildings and the residential-led (C3) mixed-use development of the site with up to 800 dwellings, up to 2ha of employment land (uses E(g)(i), E(g)(ii), and E(g)(iii) and B2), a Local Centre (including: local retail (E(a)); financial and professional services (E(c)(i), E(c)(ii) and E(c)(iii)); restaurants, cafes, and drinking establishments (E(b) and Sui Generis), hot food takeaways (Sui Generis), together with a primary school (F1(a)) and community facilities (E(d), E(f), F2(b)/F2(c)), informal and formal open space, allotments, and acoustic bunds, together with associated drainage, utilities and all other associated and necessary infrastructure (additional information and amended plans received 31/07/19, 06/09/19, 26/09/19, 21/10/23, 04/03/20, 04/05/20, and 10/06/20.*

The site now forms the subject of two reserved matters applications (55562/012 and 55562/014) and is projected to start providing homes by 2025.

The northern portion of the HN1 allocation has planning permission and reserved matters approval for a care village (55562/008, 55562/009, and 55562/010), and a full planning application has been submitted for land north of Rowlands Castle Road for the development of 82 dwellings (55562/013). Both of these schemes are being progressed by a separate developer.

Where Bloor Homes wish to comment on specific policies within the draft Local Plan, written representations have been provided in **Table 1**.

Yours sincerely,



**For and on behalf of White Peak Planning Ltd.**

Table 1: Written Responses to Local Plan 2021 – 2040 Regulation 18 Consultation. (Added words to quotations shown in <b>RED</b> and removals shown in with <del>strikethrough</del> )	
Consultation Question	Comments
<p><b>Policy CLIM2 Net-Zero Carbon Development: Operational Emissions -</b> What are your comments on this policy?</p>	<p>Bloor Homes recognise that there is a need to take steps towards reducing and mitigating the impacts of climate change. A ‘fabric first’ approach and implementation of the Energy Hierarchy has been taken for the design of all dwellings proposed as part of the two Land East of Horndean reserved matters applications, in order to reduce their energy demands.</p> <p>However, there are concerns regarding the requirement at CLIM2.1 to demonstrate a space heating demand of no more than 15 kWh/m<sup>2</sup>/year and total energy demand cap of no more than 35 kWh/m<sup>2</sup>/year. Developers will need extensive upgrades to their specifications in order to achieve the required U values, beyond that of Building Regulations and the Future Homes Standard.</p> <p>As per the recent High Court judgement regarding the Salt Cross garden village in West Oxfordshire, it is recognised that Local Planning Authorities can set their own energy efficiency requirements that go beyond the requirements of Building Regulations and national policy. Nonetheless, East Hampshire District Council must have an appreciation that developers will incur significant additional costs in order to accommodate these requirements in both the design of their homes and the calculation of operational emissions. Therefore, the impact of this proposed policy on development viability and deliverability must be taken into consideration.</p> <p>It is also noted that, as per Paragraph 4.22, the 35 kWh/m<sup>2</sup>/year total energy demand cap includes unregulated energy demand. It must be recognised that even with the use of operational energy models, it is difficult to accurately predict the energy usage of each household, and that a maximum usage cannot be enforced on future residents.</p> <p>It is suggested that the energy efficiency requirements of Policy CLIM2 are removed as follows:</p>



	<p>“All proposals for new homes will be informed by calculations of their predicted energy use intensity (EUI) prepared using an operational energy model. The calculations should be set out in the Sustainability Statement. <del>and will be expected to demonstrate that each new dwelling would achieve:</del></p> <ul style="list-style-type: none"> <li><del>• a space heating demand of not more than 15 kWh/m2/year</del></li> <li><del>• a total energy demand of not more than 35 kWh/m2/year”</del></li> </ul>
<p><b>Policy CLIM3 Net-Zero Carbon Development: Embodied Emissions -</b> What are your comments on this policy?</p>	<p>Bloor Homes support taking measures to reduce greenhouse gas emissions.</p> <p>The supporting text at Paragraph 4.41 of Policy CLIM3 lists measures that can be taken to reduce emissions, and Paragraph 4.42 recognises that not all of these options will be appropriate in every case. The use of the word ‘appropriate’ here implies that the selection of suitable measures could be based on the type of development, e.g. ‘prioritising the re-use and refurbishment of existing buildings’ would not be appropriate on a scheme that has no suitable existing buildings to be refurbished. However, the wording of Policy CLIM3 and its supporting text do not mention the impact these measures may have on development viability.</p> <p>Therefore, whilst it is agreed that measures should be taken to reduce greenhouse gas emissions, this should not come at the expense of the scheme’s viability. It is suggested that this is acknowledged either within the wording of the policy itself, or at Paragraph 4.42 which should read:</p> <p>“Not all of these options will be appropriate in every case, but designers and developers should consider which set of approaches is most suitable from early on in the design process, taking account of site specifics <b>and impacts on development viability</b>”.</p> <p>This is important as whilst the NPPF states that “Plans should take a proactive approach to mitigating and adapting to climate change” (Paragraph 158), it should also be recognised that the NPPF refers to this as a “transition to a low carbon future” (Paragraph 157). The ‘transitional’ element allows developers and the wider industry to evolve the necessary changes to their supply chains and construction practices in an economically sustainable way. Without a step-change towards net zero (as</p>

	<p>required by the Local Plan Update, not the NPPF), there is a risk that a developer’s operations may no longer be viable within the area.</p> <p>Paragraph 4.41 also states that lower carbon emissions can be achieved by “simplifying the design and layout to ensure an efficient use of materials”. It is however noted that as experienced with the two Land East of Horndean reserved matters applications, and as per the proposed Design Policies DES1 &amp; DES2, the Council are seeking the use of detailing such as on facades and fenestration that reflects the character of the local area. Whilst Bloor Homes recognise the importance of this and will always strive to provide the highest quality and well-designed homes, a balance must be struck between this and the requirement to ensure an efficient use of materials. The more varied the use of materials and the greater the need for individual plot detailing will inevitably result in a less efficient use of building materials, and may lead to a higher carbon footprint.</p>
<p><b>Policy NBE8 Water Quality, Supply and Efficiency</b> - What are your comments on this policy?</p>	<p>Paragraph NBE8.4 states that “all residential developments for new dwellings will be required to demonstrate that it meets a water efficiency standard of no more than 95 litres per person per day unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable”. It is acknowledged that this extends above the requirements of Part G Building Regulations.</p> <p>A condition is imposed on the Land East of Horndean outline planning permission to provide the optional building regulations water efficiency standard of 110 litres per day. Although the two reserved matters applications for the site are yet to be determined, they have been prepared on the basis of the 110 litre standard. The infrastructure for future reserved matters applications that may come forward following adoption of this Local Plan Update has been designed to accommodate the 110 litre standard. It is therefore considered that in cases where the 110 litre standard has been conditioned and is already a requirement for a scheme, then this should be accepted as the efficiency standard to be provided.</p> <p>It is therefore suggested that the wording of Policy NBE8 is amended as such that this lower requirement of 95 litres is enforceable for dwellings on schemes in which permission is granted following the approval of the Local Plan Update. Suggested wording for Paragraph 8.4 is as follows:</p>

	<p>“Residential developments for new dwellings will be required to demonstrate that it meets a water efficiency standard of no more than 95 litres per person per day unless it can be demonstrated that doing so is not technically feasible, <del>or</del> would make the scheme unviable, <b>or is subject to an existing planning condition allowing for a different amount.</b>”</p>
<p><b>Policy NBE12 Green and Blue Infrastructure</b> - What are your comments on this policy?</p>	<p>Bloor Homes support the need to provide a Green Infrastructure Plan, as it is made evident within the NPPF that policies should require provisions for Green Infrastructure to support healthy lifestyles (Paragraph 96), reduce the impacts of climate change (Paragraph 159a), and “taking a strategic approach to maintaining and enhancing networks of habitats and green infrastructure” (Paragraph 181).</p> <p>Paragraph NBE12.1f states that a “Green Infrastructure Plan should be submitted as part of the application process detailing how the development responds to Natural England’s 15 GI Principles and how it responds to the EHDC GI Strategy’s seven themes”. It is not clear from the wording of this text at what stage the submission of a GI Plan would be expected. The contents of such a plan is likely to vary significantly dependent on whether it is required at the outline or reserved matters stage of a scheme.</p> <p>It is suggested that the Green Infrastructure Plan is a requirement of either outline or full detailed planning applications as this will ensure that the development will be in accordance with the principles and themes from its inception. As the Green Infrastructure Plan would become approved, it would then ensure compliance through the subsequent reserved matters applications. Suggested amended wording for Paragraph NBE12.1f is as follows:</p> <p>“A Green Infrastructure Plan should be submitted as part of <b>the outline and full detailed planning</b> applications, detailing how the development responds to Natural England’s 15 GI Principles and how it responds to the EHDC GI Strategy’s seven themes.”</p>
<p><b>Policy DES2 Responding to Local Character</b> - What are your comments on this policy?</p>	<p>Whilst Bloor Homes do not have an objection to the individual components of this policy, it is questionable as to whether these all relate to ‘Responding to Local Character’. Paragraphs f, g, h, i, j, k, and l (L) are arguably general ‘good design’ principles and do not specifically relate to the characteristics of a specific area. It is also recognised that Policy DES1 ‘Well-Designed</p>



	<p>Places' is more about the overall design vision, whereas Policy DES2 expands on this by providing more descriptive requirements.</p> <p>On the basis of reducing ambiguity in the purpose of policy DES2, it is suggested that an alternative name is utilised, such as "<b>Building Design and Responding to Local Character</b>".</p>
<p><b>Policy DES3 Residential Density and Local Character</b> - What are your comments on this policy?</p>	<p>Paragraph DES3.2c states that "Any new streets must be wide enough and any new public open spaces must be large enough to accommodate green infrastructure that will provide effective climate resilience for residents (see Policy CLIM5)". This reference to Policy CLIM5 is assumed to be relating to Paragraph CLIM5.2b, which states that green infrastructure is to be used to accommodate substantial areas of shade, shelter and cooling within the development and should use a mix of species that are resilient to pests, diseases and changes in growing conditions.</p> <p>Bloor Homes are supportive of the provision of green infrastructure such as grass and hedgerow planting and street trees within Land East of Horndean, however it is unclear as to whether Paragraph DES3.2c refers to tree planting only, as neither grass nor hedgerows can accommodate shade, and grass planting cannot accommodate shelter.</p> <p>It is also not clear whether it is expected that green infrastructure is provided within highway land, or whether the provision of GI on plot boundaries and gardens would be considered acceptable.</p> <p>Based on the above, Bloor Homes believe that Policy DES3 is not "clearly written and unambiguous" as required by Paragraph 16d of the NPPF.</p> <p>Suggested amended wording for Paragraph DES3.2c is as follows:  "Any new streets must be wide enough and any new public open spaces must be large enough to accommodate green infrastructure that will provide effective climate resilience for residents <b>and includes the planting of trees, hedgerows, grass, and other flora</b> (see Policy CLIM5)."</p>
<p><b>Policy H2 Housing Mix and Type</b> - What are your comments on this policy?</p>	<p>Bloor Homes recognise the need to provide a range of house types and sizes on sites such as Land East of Horndean. Whilst identified housing needs will need to be met across the district, housing provision at Land East of Horndean should be reflective of the local requirements, and not that of</p>

the wider district. Consideration should be given to the purpose sites such as Land East of Horndean serve within their wider setting. The services and facilities both on and adjacent to the site are better suited towards families rather than households with no children. Smaller households are generally better suited to more developed areas with closer links to employment or public transport (rail) links.

As per proposed Policy DES3, development “must optimise the density of new residential uses through making an efficient use of land, whilst delivering a contextually appropriate and coherent built form”. It is therefore important to consider what is and is not appropriate.

Likewise, consideration should also be given to the fact that although smaller dwellings have a reduced footprint, a higher provision of these would likely result in more private cars overall on site. This may pose difficulties in providing sufficient and adequate parking, particularly to the design expectations of proposed Policy DES2.

It is suggested that Paragraph H2.2 of the policy is amended as follows: “Taking account of the most up to date housing information **and site-specific circumstances**, applications for residential development should demonstrate how the proposal will address the:...”

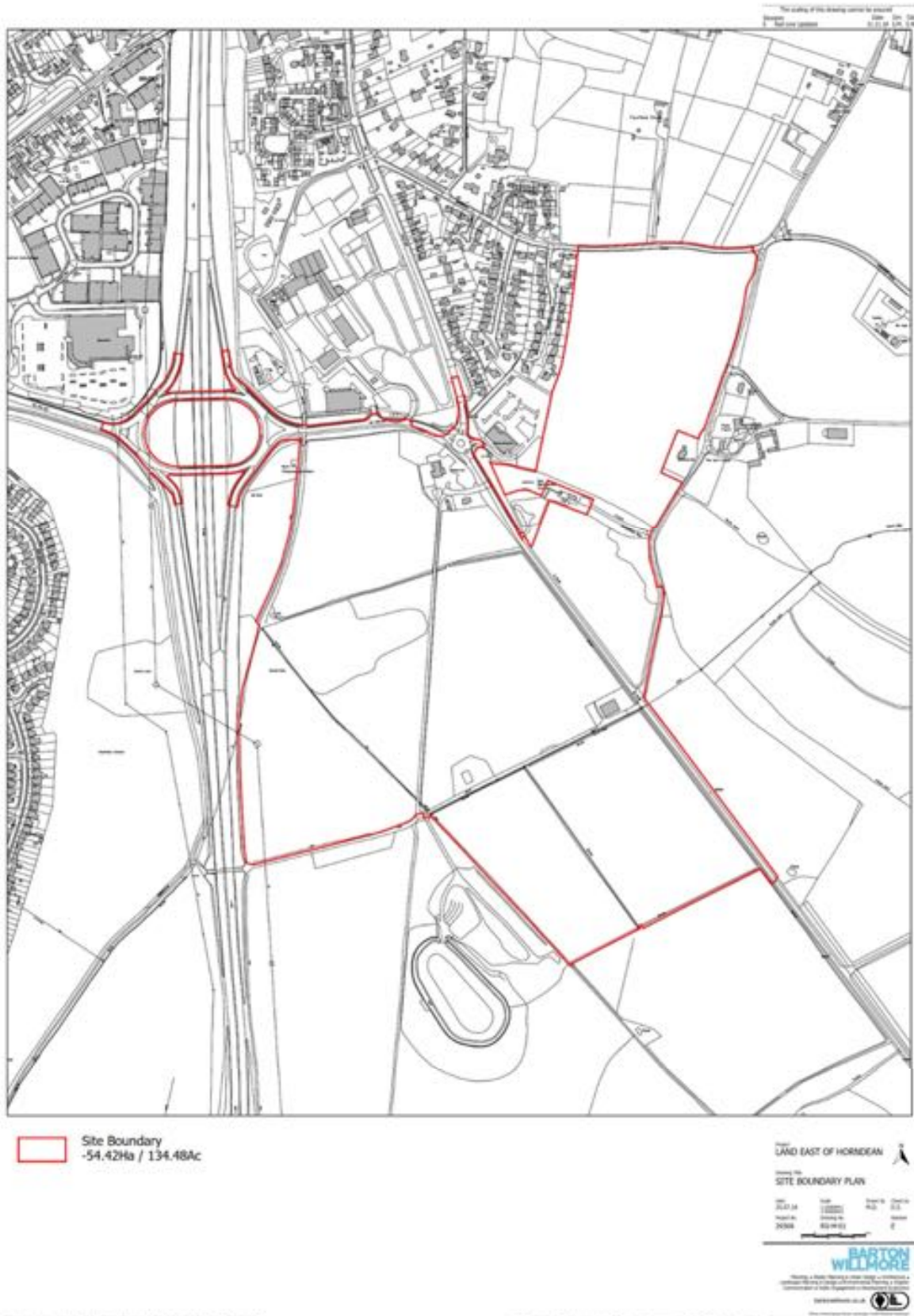
Proposed Policy H2 requires that subject to design considerations, all market homes must meet Building Regulations M4(2) ‘accessible and adaptable dwellings’ unless evidence indicates it is not feasible. Furthermore, subject to site suitability, affordable dwellings should also meet M4(2) standards, with a proportion to be ‘M4(3) ‘wheelchair user dwellings’ standards where evidenced by local need.

Bloor Homes appreciate this requirement is subject to design considerations as it is not always possible to make provisions for accessibility and adaptability. It is noted that Paragraph 10 of the guidance for optional technical standards states that “In setting policies requiring M4(2) and M4(3) compliant dwellings, local planning authorities will need to assess whether this has an impact on non-lift serviced multi-storey development in their local housing mix. Where step-free access in this type of development is not viable, neither of the Optional Requirements in Part M should be applied”.

It is suggested that there is an addition of a footnote at Paragraph H2.4 referring to this point to the likes of “Subject to design considerations<sup>1</sup>”, with the guidance text included in full within the footer of the page: **“<sup>1</sup>In setting policies requiring M4(2) and M4(3) compliant dwellings, local planning authorities will need to assess whether this has an impact on non-lift serviced multi-storey development in their local housing mix. Where step-free access in this type of development is not viable, neither of the Optional Requirements in Part M should be applied – Planning Practice Guidance, Housing: Optional Technical Standards”**.



**Appendix A: Land East of Horndean Site Location Plan**



**Our ref: JLH0448**

20 Farringdon Street  
London, EC4A 4AB  
T +44 20 3691 0500

Date: 04 March 2024

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

Dear Sir / Madam,

**EAST HAMPSHIRE LOCAL PLAN 2021-2040 – REGULATION DRAFT (JANUARY 2024)  
LAND EAST OF HORNDEAN  
REPRESENTATION BY BORROW INVESTMENTS LTD**

I am instructed by Borrow Investments Ltd to make a representation on the East Hampshire Local Plan – Regulation 18 Draft (January 2018). Borrow Investments Ltd is a large landowner in and adjoining the District, notably owning land at Hazleton Farm, Horndean, a large part of which is known as Land East of Horndean (LEOH).

This representation relates to Land East of Horndean. The site is shown on the location plan, ref: RPS/JLH0448/1, which is attached to this letter.

The Draft Plan includes Land East of Horndean (LEOH) within the existing settlement boundary for Horndean. Borrow Investments Ltd support the inclusion of the LEOH site within the settlement boundary.

**Background**

The LEOH site is the subject of an outline planning permission granted by the Council for up to 800 dwellings plus employment land, local centre, primary school and related development in December 2021. The site is the subject of a live reserved matters application, with the site projected to be providing homes by 2025.

The LEOH site is allocated for development in the adopted East Hampshire Local Plan for 700 dwellings, industrial and business use and new school. Accordingly, the LEOH land is a committed development site.

**Housing Need**

The Draft Plan recognises the need to significantly boost the supply of homes and states it is important that a sufficient amount and variety of land can come forward where it is needed (see paragraph 3.4). Borrow Investments Ltd support these objectives.

Based on an assessment of housing needs, the Local Plan calculates that the minimum number of homes required in the Local Plan Area between 2021 and 2040 is 9,082 homes. This is equivalent to 478 homes per annum. This requirement is set out in Policy S1 of the Draft Plan. The Draft Plan also recognises the need for housing in the Partnership for South Hampshire (PFSH) area. The Southern Parishes of the district, including Horndean, fall within the PFSH area. As detailed in the latest PFSH Position Statement (December 2023), there is an unmet need of approximately 12,000 homes to the year 2036 across the PFSH sub-region.

There is a need for a significant increase in housing across the District and in the Southern Parishes (as part of the PFSH area).

**Our ref: JLH0448**

Relevant to this representation is Horndean's position as a Tier 2 settlement. As stated in the Draft Plan, Horndean's inclusion as a Tier 2 settlement is recognition 'that it has a relatively large range of facilities and services for meeting some of the everyday needs of local residents' (see Page 392). Indeed, the adopted Local Plan cites Horndean as one of the most sustainable settlements in the District alongside Alton and Petersfield. Notwithstanding its Tier 2 status, the Draft Plan only proposes 320 new homes in Horndean which represents only 9.1% of the total number of homes to be delivered through site allocations. This proportion is less than that contained in the adopted Plan, which at 700 new homes is 25%.

Borrow Investments Ltd are of the opinion that it is critical for the Draft Local Plan to allocate sufficient housing, notwithstanding previous windfall sites and to go some way in meeting unmet need from the wider South Hampshire area. The Plan period should therefore be extended to the year 2041 as there is a significant need to increase delivery across the district due to the need for a 10-15% buffer. This is required to address a proportion of the unmet need from Havant in the southern part of the East Hampshire District within the PfSH area at Horndean and the identified requirement to address a greater proportion of the outstanding need for affordable housing.

Borrow Investments Ltd are also of the opinion that the allocation of new homes in Horndean should be increased. This is to reflect its sustainable location, its ability to accommodate growth and also its position within the PfSH area.

### **Land East of Horndean**

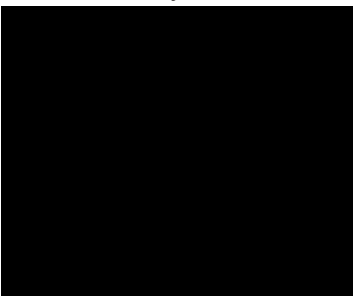
Land East of Horndean is the subject of an allocation for 700 dwellings, industrial and business use and new school in the current adopted Local Plan. Plus the site is the subject of an extant outline planning permission for up to 800 dwellings plus employment land, local centre, primary school and related development granted by the Council in December 2021. The site is also the subject of a live reserved matters application.

The LEOH site is being developed and promoted by Bloor Homes Ltd. It is anticipated that homes will be provided on the site by 2025. It is a committed development site. Accordingly, the site will make for a sustainable extension to Horndean and therefore it is proper that it forms part of the settlement boundary.

### **Summary**

Land East of Horndean Expansion Land is a committed development site to accommodate the housing requirements of Horndean, the Southern Parishes and the District as a whole. The site will also meet other requirements, such as for employment land, a local centre and open space. Importantly the site is the subject of an extant planning permission and is allocated for development in the existing adopted Local Plan. It is therefore appropriate that the site be included within the Horndean settlement policy boundary.

Yours faithfully,







Ref:	RPS/LH044/1
Project:	Hazelton Farm (Northern Area)
Location:	Hazelton
Title:	Location Plan
Date:	March 2019

**Our ref: JLH0448**

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Date: 04 March 2024

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

Dear Sir / Madam,

**EAST HAMPSHIRE LOCAL PLAN 2021-2040 – REGULATION DRAFT (JANUARY 2024)  
LAND EAST OF HORNDEAN EXPANSION LAND  
REPRESENTATION BY BORROW INVESTMENTS LTD**

I am instructed by Borrow Investments Ltd to make a representation on the East Hampshire Local Plan – Regulation 18 Draft (January 2018). Borrow Investments Ltd is a large landowner in and adjoining the District, notably owning land at Hazleton Farm, Horndean, a large part of which is known as Land East of Horndean (LEOH).

This representation relates to Land East of Horndean Expansion Land. The site is shown on the location plan, ref: RPS/JLH0448/2, which is attached to this letter.

As part of this representation, Borrow Investments Ltd request that Land East of Horndean (LEOH) – Extension Land be included within the defined settlement boundary of Horndean and also be included as a housing allocation.

**Background**

LEOH Expansion Land is immediately to the south of land known as Land East of Horndean (LEOH). The LEOH site is the subject of an outline planning permission granted by the Council for up to 800 dwellings plus employment land, local centre, primary school and related development in December 2021. The site is the subject of a live reserved matters application, with the site projected to be providing homes by 2025. The LEOH site is also allocated for development in the adopted East Hampshire Local Plan for 700 dwellings, industrial and business use and new school. Plus the site is included in the defined settlement of Horndean in this Draft Regulation 18 Plan. Accordingly, the LEOH land is a committed development site. The LEOH Expansion Land provides a logical extension to the permitted and committed LEOH site to the north.

The LEOH Expansion Land, ie land to the south of LEOH, was included as a potential site within the Large Development Sites (Regulation 18) consultation process that took place in September / October 2019, as part of the now withdrawn Local Plan. Information submitted to the Council at that time demonstrated that the extension land had the potential to accommodate around 1,000 homes, along with employment floorspace, a local centre and generous areas of open space. Accordingly, the potential of the site has been recognised by the Council in the past.

Whilst the LEOH Expansion Land is not allocated for development in the Draft Plan, it is noted that it has been included in the Council's Land Availability Assessment (LAA). The LAA document refers to the site as Hazleton Farm South (ref: LAA/RC – 009), with a stated capacity of 935 homes.

## **Housing Need**

The Draft Plan recognises the need to significantly boost the supply of homes and states it is important that a sufficient amount and variety of land can come forward where it is needed (see paragraph 3.4). Borrow Investments Ltd support these objectives.

Based on an assessment of housing needs, the Local Plan calculates that the minimum number of homes required in the Local Plan Area between 2021 and 2040 is 9,082 homes. This is equivalent to 478 homes per annum. This requirement is set out in Policy S1 of the Draft Plan. The Draft Plan also recognises the need for housing in the Partnership for South Hampshire (PFSH) area. The Southern Parishes of the district, including Horndean, fall within the PFSH area. As detailed in the latest PFSH Position Statement (December 2023), there is an unmet need of approximately 12,000 homes to the year 2036 across the PFSH sub-region.

The need for a significant increase in housing across the District and in the Southern Parishes (as part of the PFSH area) is highly relevant in terms of the promotion of the LEOH Expansion Land.

Also highly relevant to this representation is Horndean's position as a Tier 2 settlement. As stated in the Draft Plan, Horndean's inclusion as a Tier 2 settlement is recognition 'that it has a relatively large range of facilities and services for meeting some of the everyday needs of local residents' (see Page 392). Indeed, the adopted Local Plan cites Horndean as one of the most sustainable settlements in the District alongside Alton and Petersfield. Notwithstanding its Tier 2 status, the Draft Plan only proposes 320 new homes in Horndean which represents only 9.1% of the total number of homes to be delivered through site allocations. This proportion is less than that contained in the adopted Plan, which at 700 new homes is 25%.

Borrow Investments Ltd are of the opinion that it is critical for the Draft Local Plan to allocate sufficient housing, notwithstanding previous windfall sites, and to go some way to meeting the unmet need from the wider South Hampshire area. The Plan period should therefore be extended to the year 2041 as there is a significant need to increase housing delivery across the district due to the need for a 10-15% buffer. This is required to address a proportion of the unmet need from Havant in the southern part of East Hampshire District within the PFSH area at Horndean and the identified requirement to address a greater proportion of the outstanding need for affordable housing.

Borrow Investments Ltd are also of the opinion that the allocation of new homes in Horndean should be increased. This is to reflect its sustainable location, its ability to accommodate growth and also its position within the PFSH area.

## **Merits of Land East of Horndean Expansion Land**

The LEOH Expansion Land benefits from a number of advantages, which make it suitable for inclusion within the settlement boundary and as a housing allocation. These advantages can be summarised as follows:

1. LEOH Expansion Land is available and deliverable. The site is in one ownership, being Borrow Investments Ltd.
2. The site is large enough to make a significant contribution to meeting the Council's future requirements for housing in Horndean and the wider Southern Parishes, whilst also providing more than adequate land for employment / business uses, local centre and space for recreation / leisure.
3. Part of the LEOH Expansion Land falls within the parish of Rowlands Castle. Consequently, the site can assist in meeting housing requirements for both Horndean and Rowlands Castle.
4. The site is highly accessible, being well placed in relation to the main road network. The site being close to the Dell Piece East junction with the A3 (M). Plus the site is within reasonable proximity to both existing and planned district / local centres.
5. The site lies immediately to the north of the proposed Havant Thicket reservoir site. The proposal for a reservoir now has planning permission. Opportunities exist to provide links both from proposed and existing residential development through the LEOH Expansion site to the reservoir site.
6. Although the site is a greenfield site, it is not constrained by prohibitive planning designations, unlike many other sites in and around Horndean. Importantly, the site is not included within the South Downs National Park. Furthermore, it does not fall either within or close to a conservation area. Plus the site is of low agricultural quality. Also, the site is located within flood risk zone 1, demonstrating that it is not susceptible to flooding.



**Our ref: JLH0448**

7. A small part of the LEOH Expansion site is designated as a SINC (Blendworth Common North). However, this part of the site will be retained as open space and managed to bring forward biodiversity gain.
8. Although not within the National Park, its proximity means that it will be possible to provide links (both footpaths and bridleways) from the LEOH Expansion site to the National Park and vice versa. By providing access, development on the LEOH Expansion site will be complimentary to the National Park.

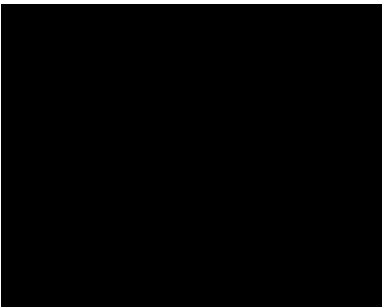
Based on the above, LEOH Expansion Land is able to bring forward a sustainable development, so as to assist in meeting the housing requirements of Horndean, the wider Southern Parishes and the District as a whole. An added advantage is that the site is capable of meeting other requirements, notably for employment development, local centre and open space.

### **Summary**

Land East of Horndean Expansion Land is suitable as a development site to accommodate the housing requirements of Horndean, the Southern Parishes and the District as a whole. The site is large enough to meet other requirements, such as for employment land, a local centre and open space. The site is available and deliverable and forms a natural extension to land to the north, which is committed for development. It offers an opportunity to deliver the sustainable growth of Horndean. Accordingly, Borrow Investments Ltd request that the site be included within the defined settlement boundary and also be included as a site allocation for housing development.

I look forward to discussing the site further with you and colleagues.

Yours faithfully,





Ref: RPS/AL/1044/12  
**Project:** Hazleton Farm (Southern Area) Homdean  
**Title:** Location Plan  
**Date:** March 2019

**From:** [REDACTED]  
**Sent:** 05 March 2024 15:46  
**To:** [EHDC - Local Plan](#)  
**Subject:** Boyer Planning obo Cala Homes - Regulation 18 Representations - Land North Fullers Road (Email 1)  
**Attachments:** [240304 - Regulation 18 Local Plan Reps - Land North of Fullers Road \(No Appendices\).pdf](#)  
[Appendix 1 - Site Location Plan.pdf](#)  
[Appendix 2 - Vision Document \(Part 1\).pdf](#)

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**Follow Up Flag:** Follow up  
**Flag Status:** Completed  
**Categories:** Consultation Responses

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Dear Sir or Madam,

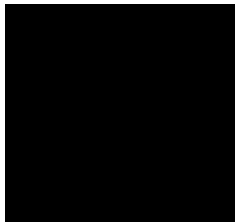
On behalf of Cala Homes, I am pleased to submit representations to the Regulation 18 consultation for the East Hampshire Local Plan. These specifically relate to Land North of Fullers Roads and Cala's interest in this land.

Owing to the file size of the representations, we will issue these across several emails. This is email 1.

If you require a comprehensive copy of the representations (i.e. a single document with all appendices included – please confirm how these can be issued to you and we will be happy to assist).

We trust our comments are helpful in the future preparation of the EHDC Local Plan and look forward to discussing the opportunities offered by Land North of Fullers Road further with Officers.

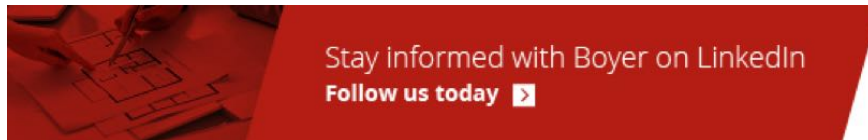
Kind Regards,



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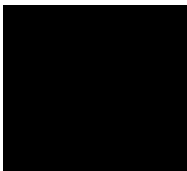
**From:** [REDACTED]  
**Sent:** 05 March 2024 15:47  
**To:** [EHDC - Local Plan](#)  
**Subject:** Boyer Planning obo Cala Homes - RE: Regulation 18 Representations - Land North Fullers Road (Email 2)  
**Attachments:** [Appendix 2 - Vision Document \(Part 2\).pdf](#)  
[Appendix 3 - Natural England Response.pdf](#)

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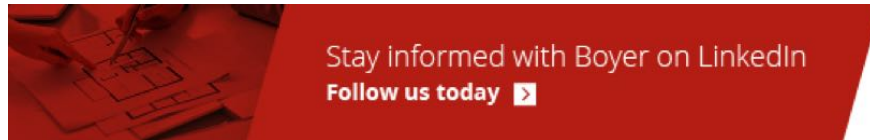
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**From:** [REDACTED]  
**Sent:** Tuesday, March 5, 2024 3:46 PM  
**To:** [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)  
**Subject:** Regulation 18 Representations - Land North Fullers Road (Email 1)

Dear Sir or Madam,

On behalf of Cala Homes, I am pleased to submit representations to the Regulation 18 consultation for the East Hampshire Local Plan. These specifically relate to Land North of Fullers Roads and Cala's interest in this land.

Owing to the file size of the representations, we will issue these across several emails. This is email 1.

If you require a comprehensive copy of the representations (i.e. a single document with all appendices included – please confirm how these can be issued to you and we will be happy to assist).

We trust our comments are helpful in the future preparation of the EHDC Local Plan and look forward to discussing the opportunities offered by Land North of Fullers Road further with Officers.

Kind Regards,







# Land North of Fullers Road, Holt Pound

Regulation 18 Representations

**Boyer**

Prepared on behalf of Cala Homes (Thames) Ltd | March 24



---

**REPORT CONTROL**

<b>Project:</b>	Land North of Fullers Road, Holt Pound
<b>Client:</b>	Cala Homes (Thames) Ltd
<b>Reference:</b>	24.5001
<b>Document and revision number</b>	IMS-F-08, Revision 2, 01.02.2024
<b>File Origin:</b>	24.1004>3.Submission Records>3.5 Representation
<b>Primary Author</b>	AL
<b>Checked By:</b>	MQ

<b>Issue</b>	<b>Date</b>	<b>Status</b>	<b>Checked by</b>
01	19.02.2024	Draft	MQ
02	01.03.2024	Draft	MQ
03	04.03.2024	Final	MQ

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## **APPENDICES**

**Appendix One – Site Location Plan**

**Appendix Two - Vision Document**

**Appendix Three – Letter from Natural England**

## EXECUTIVE SUMMARY

These representations have been prepared on behalf of Cala Homes (Thames) Ltd in response to the Draft East Hampshire Local Plan 'Our Local Plan 2021-2040 – Regulation 18 Stage' (January 2024).

Cala fully support the decision of East Hampshire District Council to commence a review of their Local Plan, in order to reflect the latest circumstances and ensure that the future needs of the District are being fully addressed. To this end, Cala fully support the Vision of the Council for the District, looking ahead to 2040.

However, in order to ensure that the Council are able to demonstrate successfully, compliance with the four tests of soundness at any future Examination, Cala have identified several areas of the draft Local Plan which should be the subject of further consideration.

Most significantly, it is considered that the Council's approach to its Housing Delivery Strategy is not positively prepared, justified, effective or consistent with national policy. Specifically, as currently drafted, the Local Plan fails to make provision for unmet needs arising from the South Hampshire Authorities and accordingly meet the Duty-to-Cooperate. The Council have also failed to effectively explore the potential to accommodate additional growth in order to meet the significant need for affordable housing, which arises within the District.

Once these considerations are sufficiently accounted for, Cala considers that EHDC's proposed Housing Requirement must be uplifted. The proposed requirement of 9,082 homes, is fundamentally misaligned to the actual housing needs of the District and the surrounding area. Consequently, the approach is at risk of being found *unsound* at examination.

The failure to maximise housing opportunities is reflected in Draft Site Allocation HOP1 (Land North of Fullers Road). Whilst Cala fully support the allocation of this Site, the indicative quantum of 19 homes is not evidenced by a robust justification and also represents a significant under-optimisation of the Site. Cala therefore recommends that EHDC reconsider the indicative quantum of housing deliverable on this Site and indeed, the overall contribution which smaller settlements can make to housing delivery in the District to ensure a realistic and proportionate contribution, which supports the ongoing vitality and viability of such settlements.

As demonstrated through these representations and the accompanying Vision Document, through the adoption of a high quality design approach, the Site could comfortably facilitate the delivery of 49 new homes. This would ensure the delivery of a visually attractive scheme which addresses the existing landscape setting, enhances the local environment, and provides new benefits to the existing settlement of Holt Pound.

Cala look forward to working positively and constructively with Officers as the Local Plan progresses and would be delighted to discuss in further detail the opportunity offered by Land North of Fullers Road and to ensure that the Council are able to demonstrate successfully, compliance with the legal and procedural requirements for Local Plans at any future Examination.



## 1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Cala Homes (Thames) Ltd ('Cala') in relation to the Draft East Hampshire Local Plan 'Our Local Plan 2021-2040 – Regulation 18 Stage' (January 2024) ('Draft Plan').
- 1.2 In responding to this consultation, these representations make specific reference to the Land North of Fullers Road, Holt Pound (the 'Site'). Our client, Cala, have acquired an interest in this Site and seeks to bring it forward for residential development. Cala welcome the Site's proposed allocation under **Draft Site Allocation Policy HOP1** and East Hampshire District Council's (EHDC) support of the Site.
- 1.3 A supporting Vision Document for the Draft Site Allocation (HOP1) has been prepared by Define. This document sets out a high level vision for the future of the Site, focusing on how housing, public open space and movement routes could create a high quality legacy serving existing and new communities and their environment. A copy of the Vision Document is provided at **Appendix 1**.
- 1.4 Notwithstanding the representations included within this Statement, Cala reserves the right to comment on any other policies not commented upon here during future stage of consultation on the Draft Plan.
- 1.5 Cala welcomes the opportunity to comment on the Draft Plan and look forward to continuing work productively with EHDC as the Draft Plan progresses through the Local Plan development process. The production of this Draft Plan is essential to meet future housing needs and address other key priorities, such as promoting sustainable development and addressing the potential impacts of climate change.

### Scope of this Representation

- 1.6 Our comments regarding the Site are made in the context of the 'tests of soundness', as set out at paragraph 35 of the National Planning Policy Framework 2023 (NPPF). These tests specify that for a Plan to be 'sound' it must be:
  - a. **Positively Prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

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

1.7 At this stage of the plan-making process it is crucial that the Council pursues an approach that is *consistent with national policy, effective, justified, and positively prepared*, in order for the Draft Local Plan to derive an approach that is capable of being found *sound* at examination. These representations comprise our recommendations to assist the Council in achieving such an approach as the emerging plan progresses toward adoption.

### Structure of this Report

1.8 These representations are structured to respond to a number of policies with the Draft Plan, as well as specific elements of the various evidence base documents which are also available for consultation, including:

- Background Paper (January 2024);
- Land Availability Assessment (LAA) (November 2023);
- Revised Settlement Hierarchy (January 2024);
- Accessibility Study (January 2024); and
- Housing and Employment Development Needs Assessment (HEDNA) (May 2022).

1.9 We have sought to structure this report in accordance with the relevant sections of the Draft Plan. The remaining sections of this report are:

- Section 2 – Vision and Objectives;
- Section 3 – EHDC’s Spatial Strategy & Housing Requirement;
- Section 4 – Draft Development Management Policies;
- Section 5 – Site Allocations: HOP1 – Land North of Fullers Road, Holt Pound; and
- Section 6 – Summary and Conclusions.

## 2. VISION AND OBJECTIVES

### Proposed Vision

2.1 At page 24, the Draft Plan sets out an overall Vision as follows;

*“By 2040 and beyond, our residents will live in healthy, accessible, and inclusive communities, where quality affordable homes, local facilities and employment opportunities in sustainable locations provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.”*

2.2 We are supportive of EHDC’s overarching vision. In particular, we endorse the need to respond to the climate emergency and promote the delivery of quality affordable homes, facilities, and employment opportunities in sustainable locations.

2.3 However, the Vision needs to place greater emphasis on the requirement to fully meet the local authority area’s housing need. Whilst the vision acknowledges that there is a need to provide “quality homes”, it does not explicitly recognise the pressing need for new homes. The local authority area does not contain any principal constraints i.e. Green Belt, National Landscapes etc. which would indicate that the housing requirement should not be met in full.

2.4 The Vision should therefore be revised to maximise the delivery of housing to meet the needs of the current and future population. The foreword on page 1 of the Draft Plan highlights EHDC’s aim of providing a “front door for everyone”. We consider that this wording, or an appropriate equivalent should be included within the Vision.

### Proposed Objectives

2.5 We are generally supportive of the Draft Plan’s objectives (Objectives A, B and C); however, we suggest that additional consideration is given to parts A and B.

#### **Objective A – Providing Sustainable Levels of Growth through the Local Plan**

2.6 We support EHDC’s objective of providing sustainable levels of growth, in particular through Objective A.1 which seeks to provide a sustainable level of housing growth to meet future housing needs. We would, however, suggest that this key objective is amended to reflect paragraph 60 of the National Planning Policy Framework (NPPF) 2023 which states that “*the overall aim should be to meet as much of an areas identified housing need as possible...*”.

#### **Objective B – Providing Better Quality, Greener Development in the Right Locations**

2.7 We are supportive of the local authority’s aim of tackling the climate emergency and promoting greener development. However, consideration should be given to Objective B.3 and its aim of ensuring that new development prioritises the achievement of net-zero carbon emissions. The objective should reflect the need to adopt a phased or transitional approach to becoming fully net-zero. A transitional approach would also reflect the fact that most residential developments can only become fully net zero, when the wider power-generation network is free from carbon-based power stations.



- 2.8 Furthermore, the Government has recently confirmed that Local Plans are not expected to include policies that go beyond standards expressed in Building Regulations. This is unless such policies are robustly justified and costed. Cala are concerned that the Draft Plan (at this stage) has not adequately addressed the costs and ramifications of the proposed Climate Change/net zero policies.

### 3. SPATIAL STRATEGY AND HOUSING REQUIREMENT

- 3.1 This section sets out Cala's position regarding the Spatial Strategy and Housing Requirement identified in the Draft Local Plan 2021-2040 (Regulation 18) consultation document.
- 3.2 In summary, Cala considers that in setting the appropriate Housing Requirement, the Draft Local Plan has not sufficiently addressed four key areas, namely;
1. The appropriate plan period;
  2. The appropriate Housing Requirement for years 2021/22 to 2022/23 of the plan period;
  3. Provision for unmet need arising from the South Hampshire authorities & the Duty-to-Cooperate; and,
  4. The significant need for affordable housing specifically.
- 3.3 Once these matters are addressed, EHDC's proposed Housing Requirement is required to be uplifted. The proposed requirement (at this stage) is fundamentally misaligned to the actual housing needs of the District and surrounding area. Consequently, the approach is at risk of being found *unsound* at examination.
- 3.4 Accordingly, the Spatial Strategy is also at risk of being found *unsound*, as an insufficient quantum or spatial distribution of housing is provided for. The proposed Spatial Strategy does not provide for an appropriate number of homes to meet the District's housing needs and as a result, the approach appears not to be *consistent with national policy*, nor is it *effective*.
- 3.5 Cala is further concerned that the Spatial Strategy does not provide for sufficient growth at the District's lower-tier settlements, such as Holt Pound, to support the longer-term vitality and viability of the important services and amenities at these settlements as well as providing a range of locations and scales of sites to maintain a deliverable supply of land.
- 3.6 To assist in redressing these concerns, Cala promotes the Land North of Fullers Road, Holt Pound as having greater capacity for housing delivery, as detailed elsewhere in these representations. Our view is that the allocation and optimisation of Land North of Fullers Road, Holt Pound will assist in preparing a *sound* Spatial Strategy. The reasons for this are detailed below.

#### **The Appropriate Housing Requirement (2021/22 – 2022/23)**

- 3.7 The Draft Local Plan period covers the 19-year period between 2021/22 and 2039/40. The Council proposes to use the District's Local Housing Need ('LHN') figure over this period, as derived through the Standard Method of calculation, plus a proportion of SDNP's anticipated unmet need. This figure is applied throughout the entire plan period.

- 3.8 However, this approach is a flawed one. The LHN figure, as derived through the Standard Method, is not capable of being applied retrospectively. The Standard Method is based on population projections from the relevant base year (in this case, from 2023), alongside housing affordability data (in this case, including up to March 2022).
- 3.9 Therefore, to apply a LHN figure calculated at the base date of the 2023/24 period to the preceding 2021/22 and 2022/23 periods would retrospectively apply an estimate of housing needs based on population projections and an affordability ratio which post-date these periods.
- 3.10 The current approach is inconsistent with PPG<sup>1</sup>, which confirms the Standard Method seeks to address previous undersupply via an affordability ratio uplift. In the absence of any justification, the Housing Requirement for the 2021/22 and 2022/23 monitoring periods should be re-based to reflect the LHN figure at the base-dates of those periods.
- 3.11 In applying the current (2023-based) LHN figure to the 2021/22 and 2022/23 monitoring periods, the Council is underestimating the level of housing need that was relevant during those periods, as the 2023 LHN figure is lower than it was as calculated for those periods. The effect of this would be to 'bake-in' the shortfall in supply of housing during these periods moving forward. Therefore, the approach artificially reduces the housing requirement, by incorrectly applying a lower LHN figure during these periods.
- 3.12 The Council are required to use the appropriate LHN figures for the 2021/22 and 2022/23 periods, as derived via the Standard Method calculation, as at the 1<sup>st</sup> April on each of those years. The consequence of re-basing the Housing Requirement in these periods is that the overall housing need is required to be increased from that proposed in the current Draft Local Plan.

### **The Appropriate Plan Period**

- 3.13 The Draft Local Plan covers the period 2021/22 – 2039/40, with each individual monitoring period running from 1st April through to 31st March of the respective year. Importantly, the Draft Local Plan therefore covers the period up to 31<sup>st</sup> March 2040.
- 3.14 In this context, it is relevant that the Council's Local Development Scheme ('LDS') (July 2023) anticipates that, at best, the Council is likely to adopt the emerging plan in 'Autumn 2025'. The Draft Local Plan is therefore evidently not expected to cover a minimum 15-year period at the point of adoption.
- 3.15 Paragraph 22 of the NPPF is clear in its requirement that '*...strategic policies should look ahead over a minimum 15 year period from adoption*'. Therefore, the plan period needs to be extended by an additional year to cover the period up to 2040/41 in order to be *consistent with national policy* and therefore *sound*. As a result, the Housing Requirement must be uplifted to reflect an additional year of LHN.

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<sup>1</sup> Paragraph: 011 Reference ID: 2a-011-20190220.



## Unmet Need & the Duty to Cooperate

### Legislative and Policy Context

- 3.16 Section 33a of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to co-operate with other authorities, the relevant County Council, and prescribed bodies or other persons, in relation to the preparation of an emerging Plan.
- 3.17 The Duty requires the Councils to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. A strategic matter includes the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as housing allocations and unmet need.
- 3.18 The NPPF makes clear that the Duty is not simply a bureaucratic exercise, but one which is fundamental to ensuring that Local Plans are *effective* and *positively prepared*. Indeed, paragraph 35 of the NPPF makes it clear that a Local Plan will be found to be '*positively prepared*' where it meets an area's objectively assessed need and where unmet need from neighbouring areas is accommodated where practical to do so.

### Unmet Need & Duty to Cooperate

- 3.19 The Standard Method of calculating Local Housing Need ('LHN') does not take account of the provision of unmet need from other local authorities in the area; specifically, in the case of EHDC, from the 'Southern Hampshire' (or 'Partnership for South Hampshire') authorities.
- 3.20 The Council acknowledges in the Draft Local Plan that several authorities in the southern extent of Hampshire are not able to meet their own housing needs. Indeed, the latest Partnership for South Hampshire ('PFSH') Spatial Position Statement, details the substantial level of unmet need arising from the PFSH Authorities, which equals some 11,771 dwellings up to 2036<sup>2</sup>.
- 3.21 Of the Southern Hampshire Local Authorities, just Fareham and Test Valley are recognised to have a surplus of supply, with Winchester being at an equilibrium. Every other Authority is in deficit, demonstrating a shortfall in future housing supply.
- 3.22 In this context, The Council's *Housing Background Paper* provides that '*...whilst no assumptions have been made on the unmet in South Hampshire that should be addressed by East Hampshire, it is considered that any dwellings surplus to the identified requirements in this Local Plan could go some way to potentially address those unmet needs*' (emphasis added).
- 3.23 It is obvious that the Council therefore recognises the functional relationship between East Hampshire District and the remaining PFSH authorities. Despite this, the Draft Local Plan proposes to make no explicit provision for any of their unmet need. The Council provides no justification for this position.

<sup>2</sup> At Table 1: Comparison of housing need and supply 2023 – 36. Page 97 of the Committee papers.

- 3.24 East Hampshire District (outside of the SDNP) is comparatively unconstrained compared to neighbouring Local Authorities. Cala is therefore concerned that, by not including explicit provision for unmet needs arising from the PfSH Authorities, that the Draft Local Plan is exposed to being found *unsound*.
- 3.25 Cala is also concerned that the Draft Local Plan presents a confused and *ineffective* understanding of the 'buffer' that is included in the Draft Local Plan above its own perceived housing needs. As indicated previously, the Council commits any surplus in delivery over the plan period toward meeting the unmet needs of the South Hampshire Authorities. However, it is evident that it would only become clear to what extent the contribution is capable of assisting unmet needs of the South Hampshire Authorities once the plan period has ended and/or the housing requirement has been accounted for.
- 3.26 This approach would add confusion for the PfSH Authorities in determining whether their existing unmet needs are being accounted for or not. Making it difficult to understand the context of setting their own housing requirements. Clearly if East Hampshire is going to make its appropriate contribution to the PfSH Authorities' unmet needs, as Cala advocates should be the case, the contribution must be specifically quantified in advance and be included from the outset of the next local plan's adoption.
- 3.27 For these reasons, Cala is concerned that the current approach is not *justified, effective or consistent with national planning policies*, and fails to meet the Duty-to-Cooperate. Cala notes that the Duty-to-Cooperate is a matter of legal compliance, which means any failure in this matter represents a serious risk to the *soundness* of the draft plan as a whole.
- 3.28 On this basis, Cala recommends that EHDC revisits its approach, to identify specific provision for the unmet need arising from the Southern Hampshire authorities. To assist in resolving this issue, Cala advocates that the allocation of Land North of Fullers Road, Holt Pound is optimised for residential development. The site is *available, suitable*, and is *achievable* in the early part of the plan period and up to 49 new homes can be delivered.

### **Affordable Housing**

- 3.29 East Hampshire faces a significant need for affordable housing over the plan period. The Housing and Economic Needs Assessment ('HEDNA') (2022) confirms a net need for 613 affordable homes per annum across the District up to 2040, with some 420 of those being outside of the National Park area. This is a need of 11,647 affordable homes over the 19-year plan period; of which 7,980 is in the Draft Local Plan area.
- 3.30 To deliver the number of affordable homes needed in the Draft Local Plan areas, the plan would be required to identify a housing supply of approximately 19,950 homes (or 1,050 dpa) up to 2040<sup>3</sup>, assuming a policy requirement of 40% affordable housing. The Draft Local Plan is seeking to provide for less than half of this figure.

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<sup>3</sup> This figure would increase once the Draft Local Plan period is extended to include 2040/41, as required by national planning policy.

- 3.31 Obviously, the Draft Local Plan is not currently able to meet the District's affordable housing needs. Notwithstanding this, it is clear a requirement significantly above the 40% rate is unlikely to be viable. Indeed, as set out at Table 9 of the Council's Authority Monitoring Report ('AMR') (2023) the Council has historically only been able to secure an average of 27% affordable housing provision.
- 3.32 The only real prospect for East Hampshire District to meet its affordable housing needs, at least more than currently being proposed, therefore likely requires the allocation of more sites for housing sufficient to deliver the District's needs at a rate of ~40%. For this reason, Cala contends there is a clear and robust case for the Council to be examining the extent to which further growth could be accommodated within the Draft Local Plan to provide for the delivery of a greater amount of affordable housing to meet the District's needs alone.
- 3.33 Such an approach would be consistent with national policy, insofar as the NPPF (December 2023) provides at paragraph 60 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...'.
- 3.34 In this context, paragraph 63 is clear that '...Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing...'.
- 3.35 Furthermore, the PPG<sup>4</sup> specifically clarifies that increasing the housing requirement for an area may be necessary where this helps to meet the need for affordable housing. In this context, it cannot be an *effective* strategy to omit the allocation of *suitable* sites that could assist in meeting the District's significant affordable housing needs.
- 3.36 It is our view that EHDC must properly assess and objectively consider the potential to increase the housing requirement to better meet the District's significant affordable housing needs. Such an over-provision is also necessary to provide flexibility and choice in the supply of new homes, and to ensure the effectiveness of the Plan.

### **Supporting the Vitality and Viability of Smaller Villages**

- 3.37 East Hampshire District benefits from an historically dispersed settlement pattern and is home to a significant number of existing settlements of smaller sizes. Recognising this dispersed settlement pattern, Cala contends that the Spatial Strategy should include sufficient provision for housing allocations to support the longer-term vitality and viability of the services and amenities in the District's smaller settlement.
- 3.38 Given the extent of existing committed development within the District, much of which was directed to the most sustainable (Tiers 1 to 3) locations through the adopted spatial strategy, it is clear that the District's remaining settlements have not seen a sufficient amount of growth over the previous adopted plan period, such as at the settlement of Holt Pound,

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<sup>4</sup> PPG ID: 2a-024-20190220.



which had previously not been recognised as a Tier 3 settlement owing to a lack of accessibility analysis, which the Council has now addressed.

- 3.1 Cala support the revisions made to the settlement hierarchy outlined under Policy S2 (Settlement Hierarchy) and in particular the allocation of Holt Pound to Tier 3.
- 3.2 Furthermore, we support the policy's recognition that *"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"*. Paragraph 3.38 also recognises the sustainable nature of site's located within Tier 3 settlements. This is evidenced by the following, *"although they do not have as wide a range of services as the higher order settlements (Tiers 1 & 2), they are still sustainable locations"*.
- 3.3 This, in turn, demonstrates that settlements such as Holt Pound are suitable for the provision of much needed housing which can be supported by existing local services, facilities and infrastructure. An overview of the key services and facilities, as well as the respective travel times and distances to the Land North of Fullers Road are outlined in the table below.

**Table 1. Proximity of Draft Site Allocation Policy HOP1 to Local Services and Facilities**

Service/Facility	Distance from Land North of Fullers Road	Travel Time – Public Transport or Walking
<b>Medical Facilities</b>		
GP Surgery – Holly Tree Surgery	1.9 Kilometers	13 minutes
<b>Education</b>		
Nursery – Little Fishes	0.9 Kilometers	13 minutes
Primary School – Rowledge C of E	0.6 Kilometers	10 minutes
Secondary School – Frensham Heights	2 Kilometers	29 minutes
<b>Shops</b>		
Supermarket – Co-operative	0.8 Kilometers	12 minutes
<b>Public Transport</b>		
Bus Stop – Routes 17 (Shortfield - Aldershot), 18 (Aldershot - Bordon Camp) and 418 (Farnborough Green - Sleaford)	200 metres	1 minute

- 3.39 However, only 19 new homes have been allocated to Holt Pound to support the ongoing vitality and viability of the settlement. Given that Holt Pound has been identified as a sustainable and accessible Tier 3 settlement, it is capable of supporting a greater quantum of housing growth, and would benefit from such growth throughout the emerging plan period.

- 3.40 The under utilisation of Holt Pound is inconsistent with national policy and the NPPF is clear at paragraph 83 that:

*'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...'*

- 3.41 Reductions in average household sizes, alongside low housebuilding rates, present a challenge for more rural communities. Without an appropriate uplift in the level of development in these locations, there is a real risk that local services in such areas would become unviable, undermining the vitality and sustainability of the rural villages across East Hampshire's Draft Local Plan areas.

- 3.42 In addition to helping maintain the vitality of villages, medium and smaller-scale development in appropriate locations will assist with the housing delivery, both in the short-term and over the life of the Draft Local Plan period. Paragraph 69 of the NPPF is clear that local planning authorities should promote a good mix of sites, with small and medium sites often able to be built out relatively quickly, which is important in the early years of new plans – notably those with dependence on larger strategic sites delivery across the plan period.

- 3.43 This approach is also well-placed when taking account that delivery of larger strategic allocation sites inevitably have a longer lead-in for delivery than medium and smaller sized sites. The optimisation of smaller sites, such as the land at Five Acres, Ropley will therefore further benefit the Council in establishing a new plan that has sufficient flexibility built-in to ensure a deliverable supply of new homes that is aligned to the District's needs is achieved in actuality.

- 3.44 In this regard, Cala advocates that the Council should optimise the allocation of Land North of Fullers Road, Holt Pound to support the longer-term viability and vitality of the settlement and to support a robust trajectory of deliverable sites across the plan period. Currently, the proposed spatial strategy unnecessarily limits the support for plan-led sustainable growth in Holt Pound. In our view this should be rectified moving forward.

### Summary

- 3.45 The approach within the Draft Local Plan fails to sufficiently address several matters, with respect to: the need to re-base the housing requirement for the 2021/22 and 2022/23 periods; covering a minimum 15-year period; the need to include provision for unmet need arising from the South Hampshire Authorities & the Duty-to-Cooperate; not meeting affordable housing needs specifically; and failing to fully support the sustainable growth of the District's rural settlements, such as Holt Pound.
- 3.46 Cala considers therefore that the Draft Local Plan (2021 – 2040), as currently formulated, is exposed to being *unsound*, as it is *inconsistent with national policy*, it is *not positively prepared*, it is *not justified*, and it is *not effective*.

- 3.47 To assist with addressing the issues set out above, Cala advocates that the allocation of Land North of Fullers Road, Holt Pound is optimised for residential development. The site is *available* for development now, it comprises a *suitable* location for residential development, and the proposed development is *achievable* within the early stages of the plan period.
- 3.48 The site therefore, provides an opportunity for a *deliverable* residential-led development scheme of approximately 49 dwellings to provide for a reasonable amount of the District's needs for market and affordable housing and to make a notable contribution to the sustainable housing needs of Holt Pound and ensure its retention as a viable smaller settlement in the District.



## 4. DRAFT DEVELOPMENT MANAGEMENT POLICIES

### Chapter 4 – Responding to the Climate Emergency

- 4.1 Chapter 4 (Responding to the Climate Emergency) sets out the Draft Plan's strategy for EHDC becoming a net-zero carbon authority.
- 4.2 Cala support the overarching principles of Chapter 4 which seeks to ensure that future development mitigates future climate change and supports the transition towards a net zero development.
- 4.3 In supporting the transition towards net zero, Cala are already promoting green initiatives through their delivery of new homes. These measures include, but are not limited to, the use of timber-frame structures, the provision of gas free development, the incorporation of Air Source Heat Pumps (ASHP) and the provision of electric vehicle charging points (EVCP) to all properties.
- 4.1 Nevertheless, Cala are concerned that further consideration needs to be given to the timescales, practicalities and costs associated with the transition to net zero development. In particular, it is unlikely that the housebuilding sector, the supporting supply chain, and the associated workforce will be capable of meeting a potential net zero policy requirement at the point the Local Plan is envisaged to be adopted. A phased transition is therefore likely to be necessary.
- 4.2 A phased transitional approach aligns with the House Builder Federation (HBF) *'Future Homes Delivery Plan'* and Building Regulations. These demonstrate how the industry will transition to net zero carbon and identify that the process of transition requires an interim step, with new homes being expected to be 'net zero carbon ready' in the short-term, and fully net zero carbon in the medium-term.
- 4.3 A transitional approach also reflects the fact that most residential developments can only become fully net zero, when the wider power-generation network is free from carbon-based power stations. For housing developments to become net zero in advance of the transition of the wider grid, they effectively need to achieve self-sufficiency in terms of energy generation. In most instances, achieving self-sufficiency will simply not be practical.
- 4.4 Accordingly, Cala consider that the Council need to review draft Policies CLIM1 – CLIM5 whilst having regard to the transitional approach to the delivery of net zero carbon within the housebuilding industry. This will ensure that the draft Policies are effective, justified and capable of being implemented at the beginning of the plan period, as well as the end.
- 4.5 The approach would also align with the Written Ministerial Statement (WMS), published on 13 December 2023 by Lee Rowley MP (Minister for Housing). This outlines that the Government does not expect Plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations.

- 4.6 Furthermore, the Draft Plan should take account of the impact climate-related policy and guidance has on viability. Achieving net zero development introduces additional build costs, which are in addition to rising costs associated with the current inflationary environment. Such costs need to be fully understood and reflected in the Local Plan's strategy and policy requirements, in order to ensure that it is capable of successful implementation.
- 4.7 As part of the evidence base which accompanies the Local Plan consultation, the Council have published the 'Provision of Professional Advice & Guidance to Inform Net Zero Carbon Planning Policies' (December 2023). Whilst this provides some examination of the cost impacts of the enhanced net zero carbon building/design measures proposed it is not a comprehensive or robust assessment and as confirmed on page 13, did not actually test the embedded carbon and 'whole life' emissions standards proposed in Draft Policy CLIM3.
- 4.8 Similarly, the East Hampshire Net Zero Evidence Base Study (2023), does give some initial consideration to cost implications, however, these are the subject of significant caveats, including the impact of high levels of inflation.
- 4.9 Cala are therefore, concerned that the current evidence base for the EHDC draft Local Plan has not demonstrated that the emerging Local Plan policies are justified or effective, particularly in respect of viability. Indeed, it is noted that the current Local Plan consultation is not accompanied by an up-to-date assessment of overall viability for the entire Local Plan. The most recent viability assessment for the entire Plan, appears to have been undertaken in 2019. There has evidently been a period of high inflation since the last assessment was concluded, and this has significantly impacted the construction industry.
- 4.10 Cala appreciates that a further assessment of Plan-wide viability is intended to be undertaken in support of the future Regulation 19 consultation. However, at this stage, the absence of a robust assessment of the cost implications associated with draft policies CLIM1 to CLIM5 means that a key feature of the Plan remains untested.
- 4.11 Overall, whilst Cala certainly supports the principles and direction of travel that the Council are seeking to achieve through the Plan's emerging net zero carbon policies, they cannot be regarded as *justified* and *effective*, against the tests of soundness for the reasons outlined above.

## **Chapter 5 – Safeguarding Our Natural and Built Environment**

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

- 4.12 Whilst Cala support EHDC ensuring water efficiency measures are incorporated into future development proposals, as part of the overall commitment to respond to the Climate Emergency, the Planning Practice Guidance is clear that Local Planning Authorities can "*where there is a clear local need*" require new dwellings to meet the optional requirement in Building Regulations of 110 litres per person per day.
- 4.13 However, EHDC have sought to exceed this optional requirement by proposing a requirement of 95 litres per person per day. This is inconsistent with national policy on

optional technical standards and should therefore, be amended to reflect the 110 litres allowed.

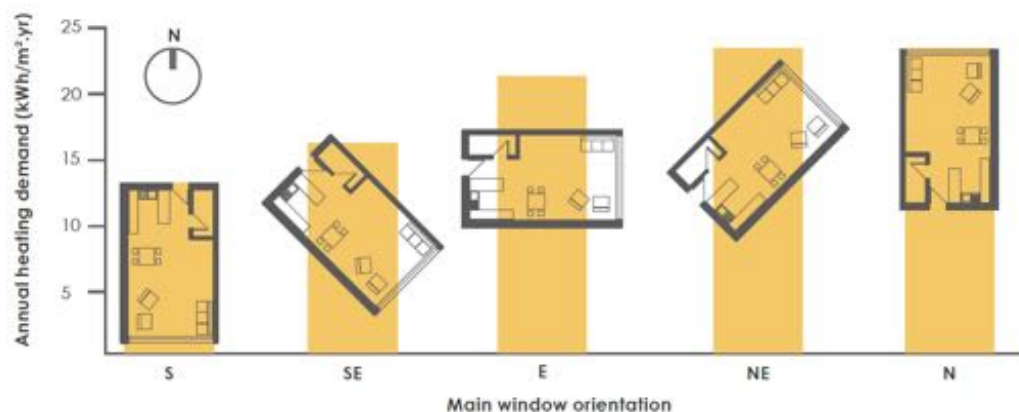
### Chapter 6 – Creating Desirable Places

- 4.14 Chapter 6 (Creating Desirable Places) seeks to promote the delivery of new development which seeks to improve the quality of East Hampshire’s natural and built environment’s.

#### Policy DES1: Well-Designed Places

- 4.15 We support Policy DES1 (Well-Designed Places) and its aim of using the energy hierarchy to influence building design and layout. It is acknowledged that this requirement needs to be satisfied alongside the need to maintain or enhance the surrounding built and landscape character. However, we suggest that the wording of Policy DES1, part A is amended to offer flexibility. The current wording appears onerous and fails to recognise that if proposals are seeking to satisfy energy as a starting point, then this may not necessarily translate into design outcomes that are sensitive to surrounding built and landscape character.
- 4.16 For example, figure 4.7 (see below) of the Draft Plan demonstrates how building orientation can influence energy demand. Whilst such practice is welcomed, policies such as Policy DES1 should recognise that an orientation which is predicated on sustainability principles, may not result in a built form layout which is conducive to the surrounding context.

Figure 4.7 How a Building Orientation Influences Energy Demand



- 4.17 Therefore, Policy DES1 should recognise that requirements of the energy hierarchy are ‘balanced’ with design and landscape considerations.
- 4.18 We also welcome Policy DES1.2’s aim of developing proposals in accordance with the design process outlined in figure 6.2 of the Draft Plan. Nonetheless, we consider that the design process needs to be predicated on the making the best of use of land. The process should seek to optimise site capacity, thus ensuring that development is of the most appropriate form and use for the site. This should be explicitly reflected in Policy DES1.

**Policy DES3: Residential Density and Local Character**

- 4.19 Cala strongly support the explicit reference in DES3.1 to allocated sites being required to optimise the density of new residential uses through making the efficient use of land. This is considered to be essential to securing the best use of allocated land.
- 4.20 Cala are however, concerned that parts a) and b) to this draft Policy would be ineffective at ensuring this aim. Firstly, part a) references development being “*within the range of existing residential densities on streets adjoining the development site*”. However, it is unclear how this criterion would be applied by a decision taker in practice given that no range is defined. The policy wording is therefore, ambiguous and ineffective.
- 4.21 Furthermore, it is not considered that simply because a site replicates the density of an adjoining street, it represents an efficient use of land or indeed optimises the density of new residential uses. Instead, this could drive development proposals to replicate existing densities in surrounding areas, which are in fact inefficiently low. A better approach would be to consider the prevailing character of the wider area, where there would be a more meaningful assessment of density and the overall characteristics of the area.
- 4.22 Part b) would also contribute towards this effect noting that it requires new residential development to be “*consistent with the predominate pattern of development*” which adjoins the development site. Once again this wording is considered to be ambiguous for a decision taker and ineffective in securing the best use of allocated land, given that surrounding densities are not always an appropriate measure of future residential densities. This would also not align with optimising the density through making the efficient use of land.
- 4.23 Cala would therefore, recommend that the wording of Policy DES3 is reviewed in order to ensure that the Policy can be implemented effectively by future decision makers and that the aspirations of optimising the density of allocated sites is truly met.
- 4.24 As demonstrated in the Vision Document, which accompanies these representations, Cala have sought to comply with Policy DES3 and optimise the density of Land North of Fullers Road. Appendix 3 of the Vision Document provides a full assessment of the illustrative masterplan against the draft Policy criteria and demonstrates that the site could deliver a high quality sustainable mixed community, with good design principles and an overall contribution of 49 new homes towards the housing needs of the District.

**Policy DES4: Design Codes**

- 4.25 We support Policy DES4 (Design Codes) and its aim of encouraging the preparation of a design code for the EHDC area, and also welcome the opportunity to prepare design codes for smaller geographies where relevant.
- 4.26 Whilst the aims of Policy DES4 are supported, it is not clear at what stage of the development management process each document is expected to be submitted – for instance, a Masterplan could be submitted up front as part of an outline planning application, with a Design Code secured by condition to be submitted ahead of or as part of any subsequent reserved matters applications. The preparation and approval of Design Codes



should not be a constraint to development coming forward in a timely manner. From our experience, Design Codes are most useful for larger sites. For smaller sites, the analysis of the site's constraints and opportunities and how a site can respond to its local context can be prepared and revised through the pre-application and application process.

### **Chapter 9 – Homes For All**

- 4.27 Chapter 9 of the draft Local Plan seeks to ensure that everyone has access to a high quality home that meets their needs and is delivered in an area that they wish to live in and that they can afford. Cala fully support this objective.

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

- 4.28 Cala agrees that the Draft Local Plan must deliver a range of house types and sizes to meet identified housing needs.
- 4.29 Cala also acknowledge the concerns set out by EHDC in respect of the operation of the First Homes initiative as identified in paragraph 9.59 of the supporting text. Cala therefore, support the intention of EHDC to provide flexibility in respect of the delivery of First Homes and the acknowledgement in the supporting text that First Homes would not be precluded from being delivered and this will be assessed on site by site basis.
- 4.30 Cala would, however, assert that reference to First Homes and the flexibility proposed by EHDC should be referenced explicitly within the wording of the draft Policy rather than solely the supporting text.
- 4.31 It is also important that it is recognised that First Homes are *also* “the government’s preferred discount market tenure” and there is an expectation that “at least 25% of all housing units delivered by developers” will be First Homes (PPG; Paragraph: 001 Reference ID: 70-001-20210524).
- 4.32 The flexibility to discuss appropriate solutions on an individual site basis is therefore, supported, however, EHDC should not seek to utilise such discussions as a mechanism for preventing the delivery of First Homes within the District, where these are proposed by the Applicant, as such delivery would align with national planning policy objectives.

## 5. LAND NORTH OF FULLERS ROAD, HOLT POUND

### Land North of Fullers Road, Holt Pound (HOP1 – LAA Reference BIN-005)

- 5.1 EHDC's support for new residential development at the Land North of Fullers Road, Holt Pound, expressed through the draft allocation HOP1 (LAA Reference – BIN-005), is welcomed and supported by Cala.
- 5.2 The Site is allocated for a total of 19 homes and these homes are identified as being likely to be delivered within the first five years of the Draft Plan's adoption, as stipulated under the Land Availability Assessment (November 2023).
- 5.3 Land North of Fullers Road is approximately 3.84 hectares in size with a net developable area of 2.03 hectares. A Site Location Plan is provided at **Appendix 1**.
- 5.4 The Site is irregular in shape and comprises an agricultural field located directly behind and to the north of a ribbon of housing that lines Fullers Road to the south, and a ribbon of housing fronting the A325 to the north-west. This existing development comprises the existing settlement boundary for Holt Pound, which also incorporates development along School Road, which spurs southwards from Fullers Road.
- 5.5 The site is accessed via a single track road from Fullers Road to the south east. This road, located between two homes along the Fullers Road frontage (The Ford and Bamacre), serves 3 homes behind the Fullers Road frontage, an agricultural / equestrian complex to the north-east of the site (The Kiln Equestrian Centre) and a dwelling adjacent (Glen Cottage). There is an existing agricultural access into the site from this road in the south east corner of the site.
- 5.6 A Public Right of Way runs along the north-eastern and eastern boundaries of the site, which provides a pedestrian connection between areas of the South Downs National Park. The boundaries of the Site, including the edges of the access track, are well vegetated, which provides a high quality landscape setting to the Site and a high level of existing visual screening.
- 5.7 Further east along Fullers Road, lies the settlement of Rowledge, which lies within the administrative boundaries of Waverley Borough Council. Rowledge incorporates a number of existing services and facilities including a recreation ground, a primary school, a public house and a number of commercial units, including a Co-Operative Convenience Store, which also provides Post Office services.

### Vision and Proposed Development

- 5.8 A Vision Document has been prepared by Define, on behalf of Cala. This document demonstrates how the Site could facilitate a high-quality form of housing development, comprising 49 units. The scheme proposed seeks to be visually attractive and addresses the

existing landscape sensitivities, enhances the local environment, and provides new benefits to the existing settlement of Holt Pound and to the villages of Rowledge and Wrecclesham.

- 5.9 This vision for the Site is predicated on three key design principles:
- i. **Landscape Led Framework** – the proposals respond to the existing character and sensitivities and brings nature into the scheme for the benefit of residents.
  - ii. **Connectivity** – the proposals seek to connect existing and new communities by providing a network of active travel routes that provide access to the scheme, new public open spaces, local facilities, as well as to the PRoW network and the National Park / Forest beyond
  - iii. **Legibility** - the proposals seek to reinforce the local identify by creating legible and visually attractive streets, spaces and buildings, inspired by the local landscape and architectural character.
- 5.10 The Vision Document, which is underpinned by landscape and design-led approach, demonstrates that a total of 49 dwellings could be delivered on-site. The homes delivered will comprise a mix of 1, 2, 3 and 4 bedroom units, thus satisfying the need for a mix of housing types and sizes, as per Policy H2 (Housing Mix and Type).
- 5.11 A copy of the Vision Document is enclosed as **Appendix 2**.

#### **Proposed Quantum of Development**

- 5.12 Given the technical and design work undertaken by Define, as per their Vision Document, we consider that the Site's allocation for 19 homes would result in the under-optimisation of a suitable and deliverable Site. Moreover, it is not clear from the Draft Plan's evidence base of how EHDC have arrived at a figure of 19 homes or how this figure is justified.
- 5.13 Policy S2 affords a presumption in favour of sustainable development for site's within the Settlement Policy Boundary (SPB), provided that the proposals:
- Respect the setting, form, and character of the settlement;
  - Avoid actual or perceived coalescence of settlements; and
  - Ensure good accessibility to local services.
- 5.14 Cala have sought to develop an indicative scheme for the Site, in accordance with Policy S2 and the design process outlined in figure 6.7 of the Draft Plan (associated with Policy DES1). The indicative scheme is able to accommodate a higher quantum of development, specifically 49 dwellings, including 40% affordable housing.
- 5.15 Cala have sought to develop the proposals through a landscape and design-led process which seeks to respond positively to the local context and in doing so respects the setting, form, and character of the surrounding area. The proposals will be located towards the south-west of the Site, in accordance with requirements stipulated by draft allocation HOP1, therefore avoiding coalescence, notwithstanding the presence of the Kiln Equestrian Centre.

- 5.16 The Site also benefits from being in a sustainable location, evidenced by its ‘*above average*’ score in the Local Planning Authority’s Accessibility Study. Paragraph 3.38 of the Draft Plan recognises that Tier 3 settlements such as Holt Pound are often the focal point for surrounding villages in terms of the provision of local services and facilities. All in all, Holt Pound, and draft allocation HOP1 are considered to be sustainable locations, in turn satisfying the third criteria under Policy S2.3. The site’s sustainable location is evidenced by its proximity to a range of local services, facilities, and transport infrastructure, as per table 1.
- 5.17 All in all, it is evident that any forthcoming proposals facilitating the delivery of approximately 49 homes would be able to satisfy the requirements of Policy S2.
- 5.18 The delivery of 49 new homes on Land North of Fullers Road would also strongly support the objectives of draft Policy DES3.1 which seeks to ensure allocated sites are optimising the density of new residential uses through making the efficient use of land.
- 5.19 More widely, the effective use of the site, would also make a reasonable contribution towards the District’s needs for market and affordable housing, which as identified within these representations are not considered to have been fully addressed in the current draft Local Plan. Further, the optimum use of the site would also make a notable, but appropriate, contribution to the sustainable housing needs of Holt Pound and ensure its retention as a viable smaller settlement in the District.

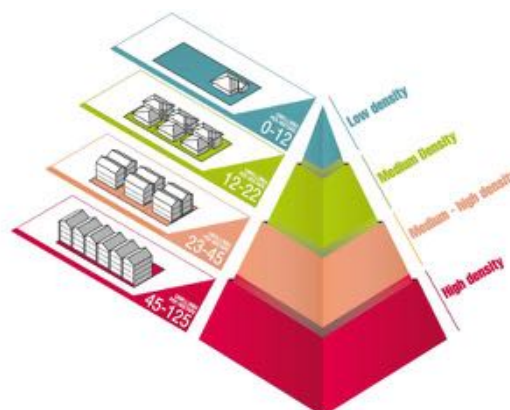
### Response to Local Density and Character

- 5.20 The proposals outlined within the Vision Document have also sought to satisfy Policy DES3 (Design & Local Character). In doing so, they seek to optimise the density of the Site through making an efficient use of land, whilst delivering a contextually appropriate and coherent built form. The constituent parts of Policy DES3 are dealt with below. This sub-section should be read in tandem with Appendix 3 of the supporting Vision Document.

#### *Density*

- 5.21 The indicative quantum of 19 units appears to be predicated on the assumption that draft allocation HO1 should deliver a low density of development. This assumption is informed by figure 6.7 of the Draft Plan (see below).

**Figure 6.7 Explaining Residential Densities**





5.22 The site measures approximately 3.84 hectares in size with a net developable area of 2.03 hectares. A proposed quantum of 19 dwellings would amount to a density of 9 dwellings per hectare (dph), which would be considered low and would not optimise the use of the land. Paragraph 129 of the NPPF states that *“where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.”*

5.23 The current density assumption for draft allocation HO1 does not ensure the optimal use of the Site and would therefore, conflict with paragraph 129.

#### **Policy Requirements**

5.24 The following paragraphs respond to the proposed policy wording having regard to the proposed layout included within the Vision Document.

#### *Consistency with Predominant Pattern of Development*

5.25 The proposals seek to deliver perimeter blocks of development. Therefore, the new building line includes running development parallel with the existing linear A325 / Fullers Road houses and is consistent with and completes the block. This delivers good design principles with clear public front facing / private rear facing development.

#### *Building Line Position*

5.26 The proposed housing is a mix of detached, semi-detached and apartments. Building lines are set back from the road frontage which also allows opportunity to include green infrastructure within the street scene.

#### *Height to Width Ratio for Streets*

5.27 A 1.3 ratio for building height to street width is often cited for a sense of enclosure. However, due to the openness of Fullers Road, an appropriate ratio of building height to street width will need to be developed for delivering new development.

5.28 New streets will be large enough to accommodate green infrastructure that will help provide effective climate resilience as required by the draft allocation and associated policies.

#### *Back to Back Distances*

5.29 The proposal seeks to complete the perimeter block with appropriate back to back distances being provided, whilst respecting existing vegetation and including an enhanced landscape buffer along the existing fence line.

#### *Plot Coverage*

5.30 Large existing private garden sizes will not be replicated, as this does not represent the efficient use of land; however approximately half of the site is proposed a public open (green) space for the benefit of all the community.

*Building Heights and Massing*

- 5.31 Proposed housing is 2 storeys in height, with apartment buildings being a maximum of 2.5 storeys in height. Roof form will comprise pitched roofs, with hips which reference the local townscape vernacular and character.

**Housing Need Context**

- 5.32 In addition to the design-related rationale for increasing the quantum of homes, it is essential to recognise the Draft Plan's objective (A.1) of providing a sustainable level of housing growth to meet future housing needs and to provide homes for all. As outlined earlier in these representations, there is a very significant volume of unmet need arising within the sub-region, which will need to be provided for or otherwise go unaddressed.
- 5.33 By adjusting the quantum, in line with the relevant design considerations, it is considered that the Site would be able to accommodate a greater quantum of housing commensurate with the settlement and wider landscape context.
- 5.34 Further, the optimum use of the site would also make a notable, but appropriate, contribution to the sustainable housing needs of Holt Pound and ensure its retention as a viable smaller settlement in the District.
- 5.35 Overall, it is therefore, recommended that the quantum of housing associated with draft allocation HOP1 is increased to fulfil the Site's potential and to allow for its optimisation.

**Summary of Reasons for Inclusion**

- 5.36 We support the reasons listed for the Site's inclusion within the Draft Plan, as a proposed allocation.
- **Location** – we agree with the draft allocation, in that the Site benefits from being in a sustainable location, evidenced by its '*above average*' score in the Local Planning Authority's Accessibility Study.
  - **Access** – the development proposals will include for the widening and improvement of the track from Fullers Road. The development will connect into the existing public right of way network to enable pedestrian connectivity. The principle of the proposed access strategy has been considered acceptable by Hampshire County Council (HCC).
  - **Environmental Constraints** – the Site is not limited by onerous environmental constraints. However, we consider those present, e.g., flood risk and existing green infrastructure, could both be sensitively addressed through the design interventions, as demonstrated by the indicative masterplan which accompanies these representations.
  - **Landscape** –
    - a. we support the allocations endeavour of locating development to the south-eastern portion of the Site and keeping the north and eastern parts of the Site free from development. This is achievable as demonstrated by the indicative masterplan which

accompanies these representations. The indicative masterplan also demonstrates that there are no adverse landscape and visual impacts on the setting and context of the SDNP.

- b. Development of the Site would locally reduce visibility to the SDNP from the footpath bordering the Site to the north. The Site is however almost entirely screened in view from locations within the National Park and proposed development would be viewed in context with other intervening built form at its margins.
  - c. Views toward the development from the northern footpath are glimpsed and any introduced development would typically be viewed in combination with existing residential built form. The development proposals are envisaged also to increase tree cover within the site and could support enhancements to public access through both the provision of new connections and S106 contributions. Development is accordingly considered not to cause any material harm to landscape or visual amenity and is anticipated not to materially harm the setting of the SDNP. Further detail on Landscape impacts is provided within the Vision document enclosed as Appendix 1.
- **BNG** – we support the retention of the existing mature trees and hedgerows with the aim of achieving a net gain in biodiversity. The proposed layout respects the existing vegetation and seeks to build upon it through a landscape led scheme. However, the allocation should recognise that where an on-site net gain is not possible, that off-site net gains and biodiversity credits should be sought. With regards to forthcoming development on this site, Cala seek to achieve a minimum BNG of 10% in accordance with national policy and guidance.
  - **Drainage** – the proposals would include for an attenuation basin. A pre-application submission has been made to the LLFA for their comments on the proposed drainage strategy.
  - **Green Infrastructure** – there is an opportunity to retain and enhance the existing mature hedgerows as part of the landscape led process. There is a significant amount of new public green space proposed, as part of a public network that reflects existing townscape character and pattern.
  - **SPA** – Cala have sought initial advice from Natural England (NE) on this matter who have confirmed that on the basis of the current illustrative proposals for the Site, the Site can be screened out from requiring a Habitat Regulations Assessment in relation to the Thames Basing Heaths SPA, Wealden's Heaths Phase I SPA and Wealden's Heath Phase II SPA. Further detail is contained within NE's response which is provided at **Appendix 3**.
  - **Sustainability** – whilst we recognise the need to facilitate an east-west layout to support passive design principles, we would suggest that this requirement is balanced with the need to ensure built form is in-keeping with the existing urban grain and built form in the surrounding areas.

**Infrastructure Requirements**

- 5.37 We understand that any forthcoming development is expected to support the delivery of new infrastructure.
- 5.38 In terms of financial contributions, we recognise that contributions are expected towards educational and health facilities. For the latter, a financial contribution is expected towards the Rowlands Castle Surgery. We welcome the provision of these contributions.

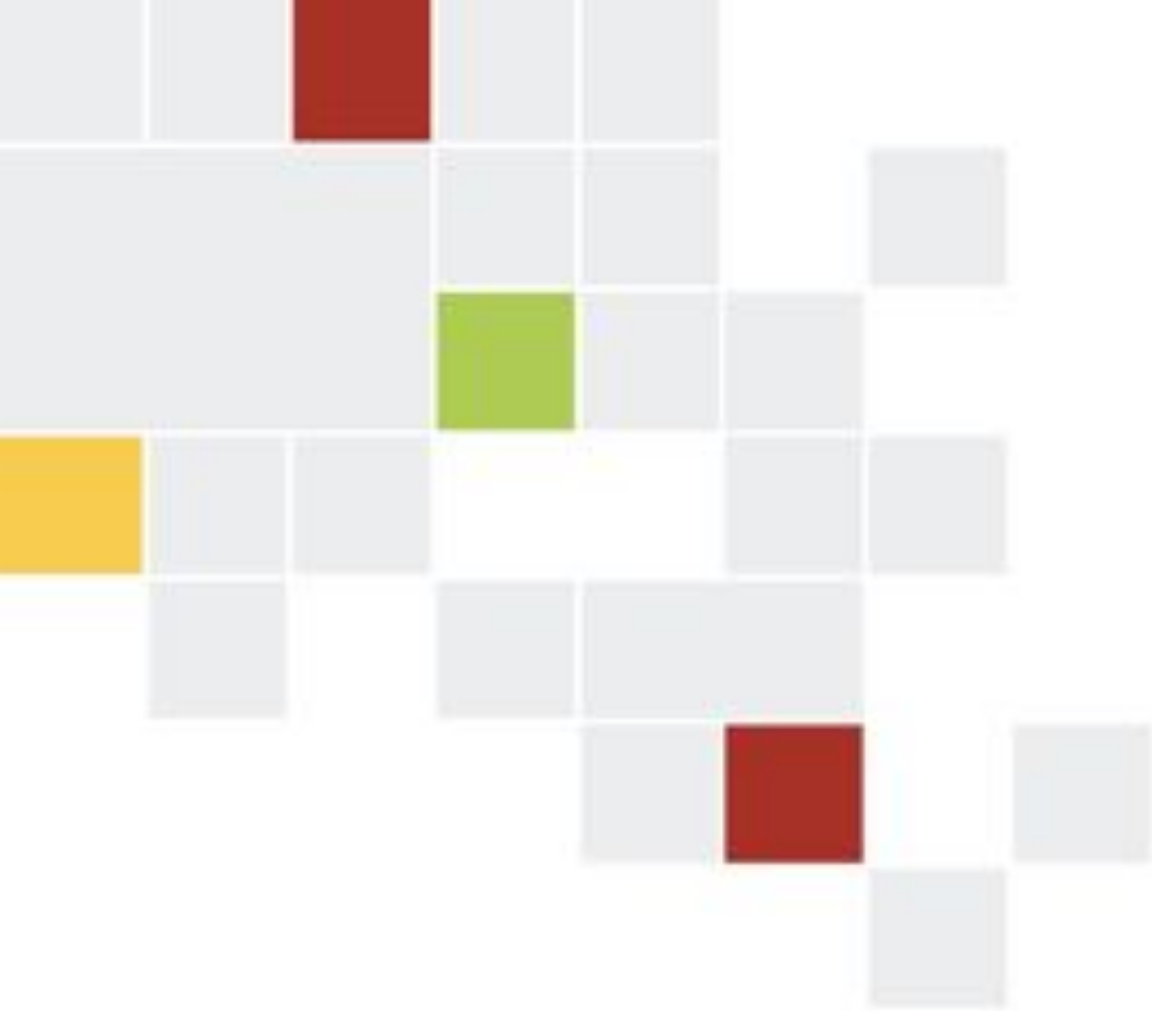


## 6. SUMMARY & CONCLUSIONS

- 6.1 These representations have been prepared by Boyer on behalf of Cala Homes (Thames) Ltd, in response to EHDC's Regulation 18 Draft Local Plan (January 2024) Consultation.
- 6.2 Cala supports the preparation of a new Local Plan for EHDC, which will ensure the sustainable delivery of new homes and communities in the right places. Through these representations Cala has sought to identify potential areas where emerging strategies, objectives and policies require reflection, in order that the Plan may ultimately be found sound at a future Examination.
- 6.3 Central to Cala's representation is the need for EHDC to reconsider policies pertaining to housing delivery and, consequently Draft Site Allocation HOP1.
- 6.4 With regards to the Housing Strategy, Cala reaffirm their view that Draft Local Plan (at Draft Policy H1) fails to address several matters sufficiently. This concerns the need to include provision for unmet needs arising from the South Hampshire Authorities and the Duty-to-Cooperate; the need to re-base the housing requirement for the 2021/22 and 2022/23 periods; and the omission of exploring growth potential to accommodate the significant need for affordable housing specifically.
- 6.5 Once these considerations are sufficiently accounted for, Cala considers that EHDC's proposed Housing Requirement must be uplifted. The proposed requirement (at this stage) of 9,082 homes, is fundamentally misaligned to the actual housing needs of the District and surrounding area. Consequently, the approach is at risk of being found *unsound* at examination.
- 6.6 Cala welcome EDHC's support of the Draft Site Allocation HOP1 and look forward to continuing work productively with EHDC as the Draft Local Plan progresses through the Local Plan development process. Nevertheless, Cala considers the proposed quantum of 19 homes to represent a significant under-optimisation of the Site. Cala therefore recommends that EHDC reconsider the indicative quantum alongside the Vision Document prepared by Define, on behalf of Cala. This document demonstrates that through adopting a landscape-led and design-led approach, the Site could comfortably facilitate the delivery of 49 homes. This would ensure the delivery of a visually attractive scheme which addresses the existing landscape sensitivities, enhances the local environment, and provides new benefits to the existing settlement of Holt Pound and to the villages of Rowledge and Wrecclesham.
- 6.7 We consider the uplift particularly pertinent within the context of the Draft Plan's aim of meeting the requirements of both market and affordable housing need.
- 6.8 With respect to the proposed vision and objectives, we endorse the need to positively respond to the climate emergency and promoting the delivery of quality affordable homes, facilities, and employment opportunities in sustainable locations. However, we recommend that the vision and supporting objectives go further to encourage the delivery of housing in

accordance with the aims of the NPPF, which advises that the overall aim should be to meet as much of an area's identified need as possible.

- 6.9 In particular, we are supportive of the amendments to the settlement hierarchy under Policy S2, especially the allocation of Holt Pound to Tier 3 of the hierarchy. We wholly agree that Holt Pound is positioned in a sustainable location which can comfortably accommodate additional residential development.
- 6.10 The approach to the Climate Emergency is supported in principle. However, it is essential that any policies applying additional or uplifted development and building standards are properly evidenced, technically feasible and viable. It is also important that the Plan allows for a transition to net zero carbon development, which includes appropriate intermediate steps. This will ensure that the development industry and construction supply chain is able to adapt, whilst continuing to deliver new homes.
- 6.11 With respect to Chapter 6, we consider that the Draft Plan should afford flexibility during the pre-application and application process, when trying to balance design requirements against sustainability requirements.
- 6.12 If you have any questions regarding this representation, please do not hesitate to contact us. Otherwise, we trust our comments will be given due consideration and we reserve the right to make further representations with additional evidence in due course.



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wokingham@boyerplanning.co.uk | boyerplanning.co.uk

**Boyer**



REV	DATE	DESCRIPTION

**CALA**

Land at Fullers Road, Rowledge

Red Line Boundary



Scale	1:1250 @ A3	Fig No.	L/001
Date	26.08.2023	Rev	
Sheet	1		





# Vision Document

LAND NORTH OF FULLERS ROAD, HOLT POUND

MARCH 2024



**Define.**

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# Introduction

This vision document is prepared by Cala Homes and relates to 3.84 hectares of land to the north of Fullers Road, Rowledge, East Hampshire, GU10 4JZ.

It sets out a high level vision for the future of this land, focusing on how housing, public open space and movement routes that could create a high quality legacy serving existing and new communities and their environment.

It illustrates how a bespoke, high quality form of development could create a visually attractive scheme, that addresses the existing landscape sensitivities, enhances the local environment and provides new benefits to the existing settlement of Holt Pound and to the villages of Rowledge and Wrecclesham.







02.

# Context

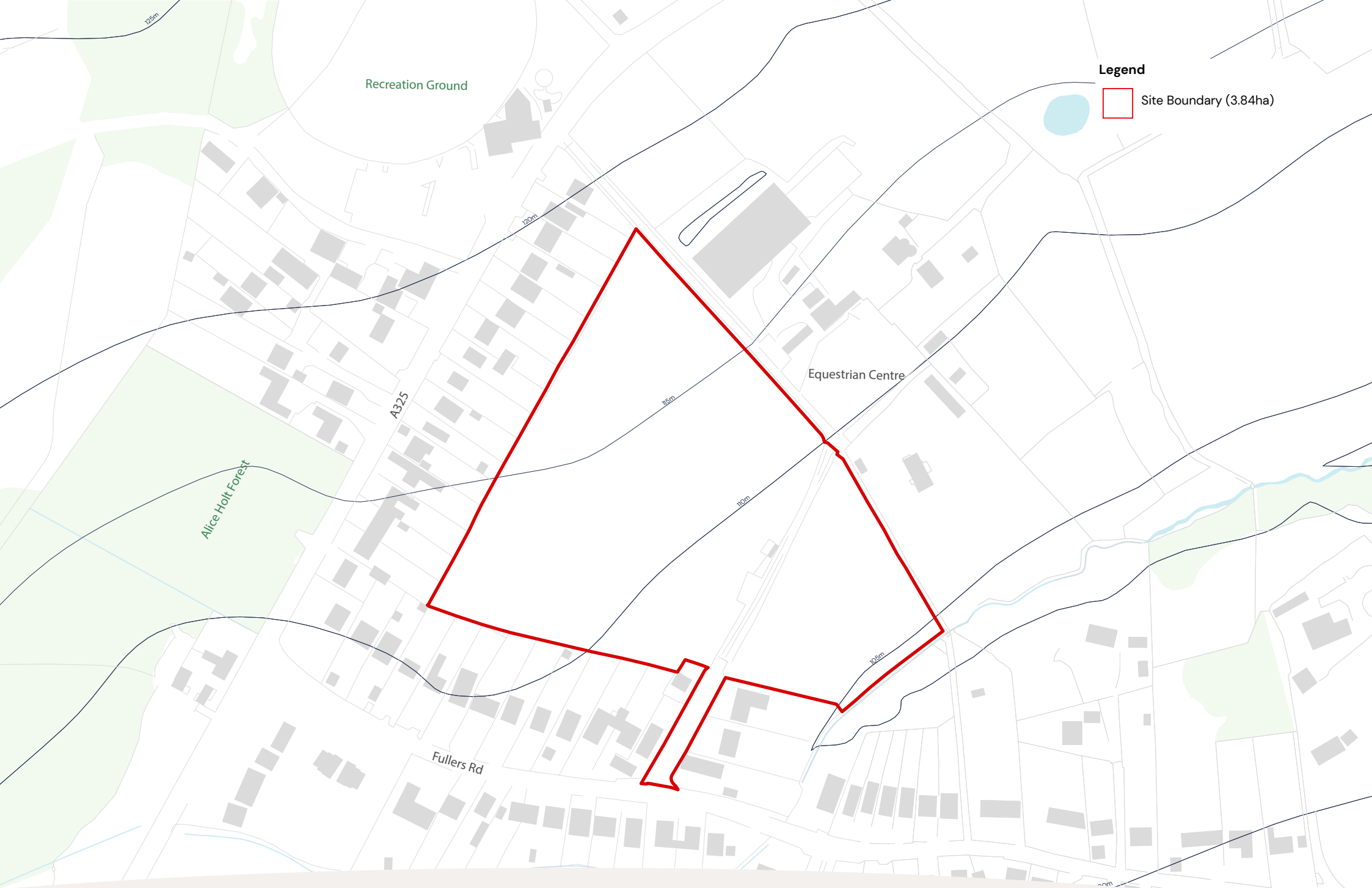
The Site is located on the edge of Holt Pound and the village of Rowledge.

Holt Pound is a settlement situated in East Hampshire, in close proximity to the border with Surrey and to the boundary of the South Downs National Park. It is mainly residential, with a small number of local facilities, including a pub, a recreation ground and Kiln Equestrian Centre. There are a number of Public Rights of Way and recreational routes to Alice Holt Forest.

The site comprises an irregularly shaped field parcel dissected by a track that provides vehicular access off Fullers road to the equestrian centre to the north. The PRoW that runs along the north-eastern / eastern boundary forms a pedestrian connection between two areas of the National Park / Forest. The south and west boundaries are defined by exposed development boundaries.

There are a number of trees and hedgerows along the site boundaries and the existing track.





**SITE LOCATION PLAN**

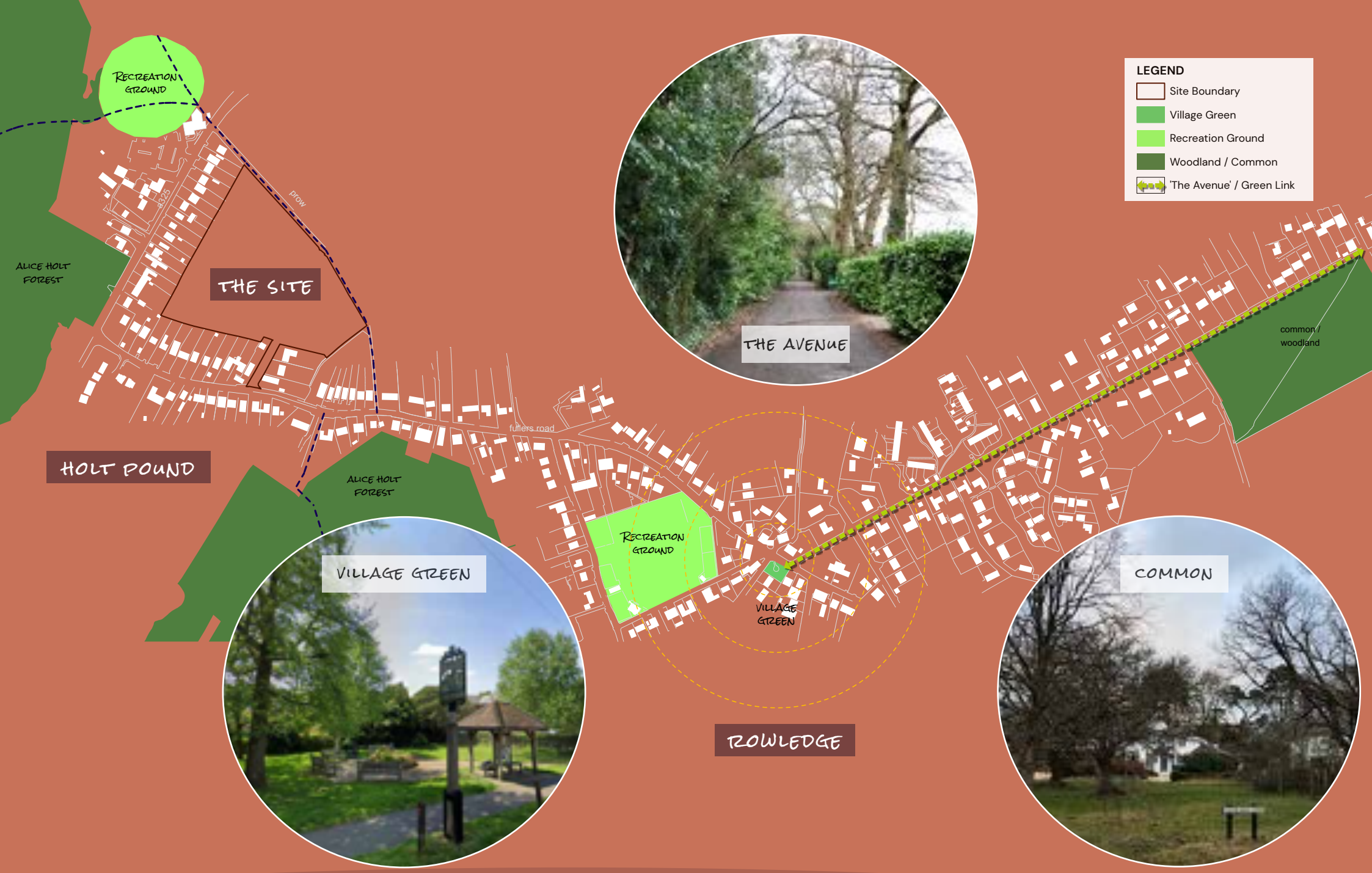
## Seeking inspiration in the local vernacular....

As part of the context analysis we have looked into the local landscape and townscape character, analysing some of its successful spatial qualities, architectural details and materials. (please also refer to Appendices 2 and 3 for further details).

These, together with the site opportunities and constraints have informed a landscape led, visually attractive scheme, with a strong identity and references to the local context, character and vernacular.







**LEGEND**

- Site Boundary
- Village Green
- Recreation Ground
- Woodland / Common
- 'The Avenue' / Green Link



THE AVENUE

THE SITE

HOLT POUND



VILLAGE GREEN



COMMON



ROWLEDGE



RECREATION GROUND

VILLAGE GREEN

LANDSCAPE & TOWNSCAPE CHARACTER - EXISTING



- ① Strong landscape character integrated into the built form, with the forest landscape visually dominant.
- ② The topographical levels of the site fall from the north-west to the southeast. The steepest part is located in the southeast corner.
- ③ Mature trees and hedgerows along the site boundaries and along the existing track.
- ④ Site context of detached houses set back from the road. The back gardens of these houses create a defined edge.
- ⑤ Opportunity to create a 'green link' connecting the two forests, along the public right of way, bringing nature into the scheme, respecting the site context.
- ⑥ Opportunity to establish a positive edge for Holt Pound that fronts on to the new public open space and fields beyond.





**Legend**

 Site Boundary	 National Park
 Constituency Boundary	 Ancient Woodland (Semi-natural)
 1m Contours	 Ancient Woodland (Replanted)
<b>Landscape</b>	 Common land
 Steepest point	<b>Connections</b>
 Topographic drop	 Public Right of Way
 Existing Vegetation	 Point of Access
 Existing Tree	<b>Community</b>
 Views	 Equestrian Centre
 Stream	 Hospitality
 Flood Zone 2	 Recreation Ground
 Flood Zone 3	 Repair Garage
 Existing Properties/ Back Gardens	



03.

# VISION & DESIGN PRINCIPLES

Our ambition is to create a development that demonstrates how a sensitive, landscape led design approach can create benefits for existing and new residents, whilst enhancing the character of the environment.

This ambition is realised through the following emerging three design principles that are explored further on the following pages and have been used to shape the emerging illustrative layout of the scheme.



To create a landscape led framework that responds to the existing character and sensitivities and brings nature into the scheme for the benefit of the new residents and the wider community.



To connect existing and new communities by providing a network of active travel routes that provide access to the scheme, new public open spaces, local facilities, as well as to the PRoW network and the National Park / Forest beyond.



To reinforce identity by creating legible and visually attractive streets, spaces and buildings, inspired by the local landscape and architectural character.



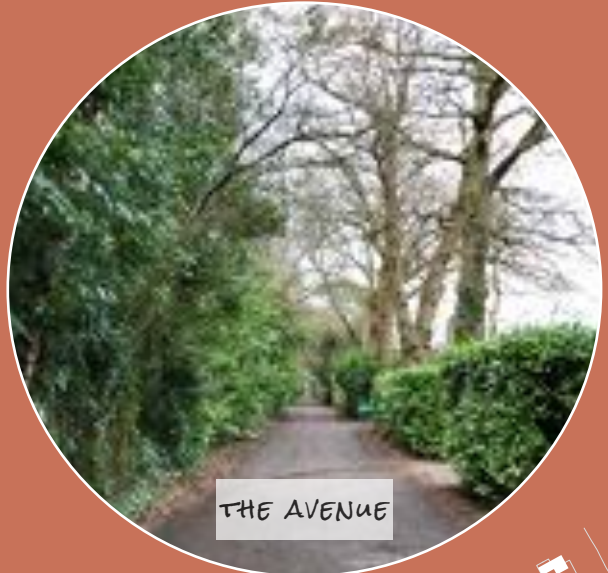


**LEGEND**

- Land North of Fullers Road
- Village Green
- Recreation Ground
- Woodland / Common
- 'The Avenue' / Green Link

**HOLT POUND**

**LAND NORTH OFF FULLERS ROAD**



**THE AVENUE**



**VILLAGE GREEN**

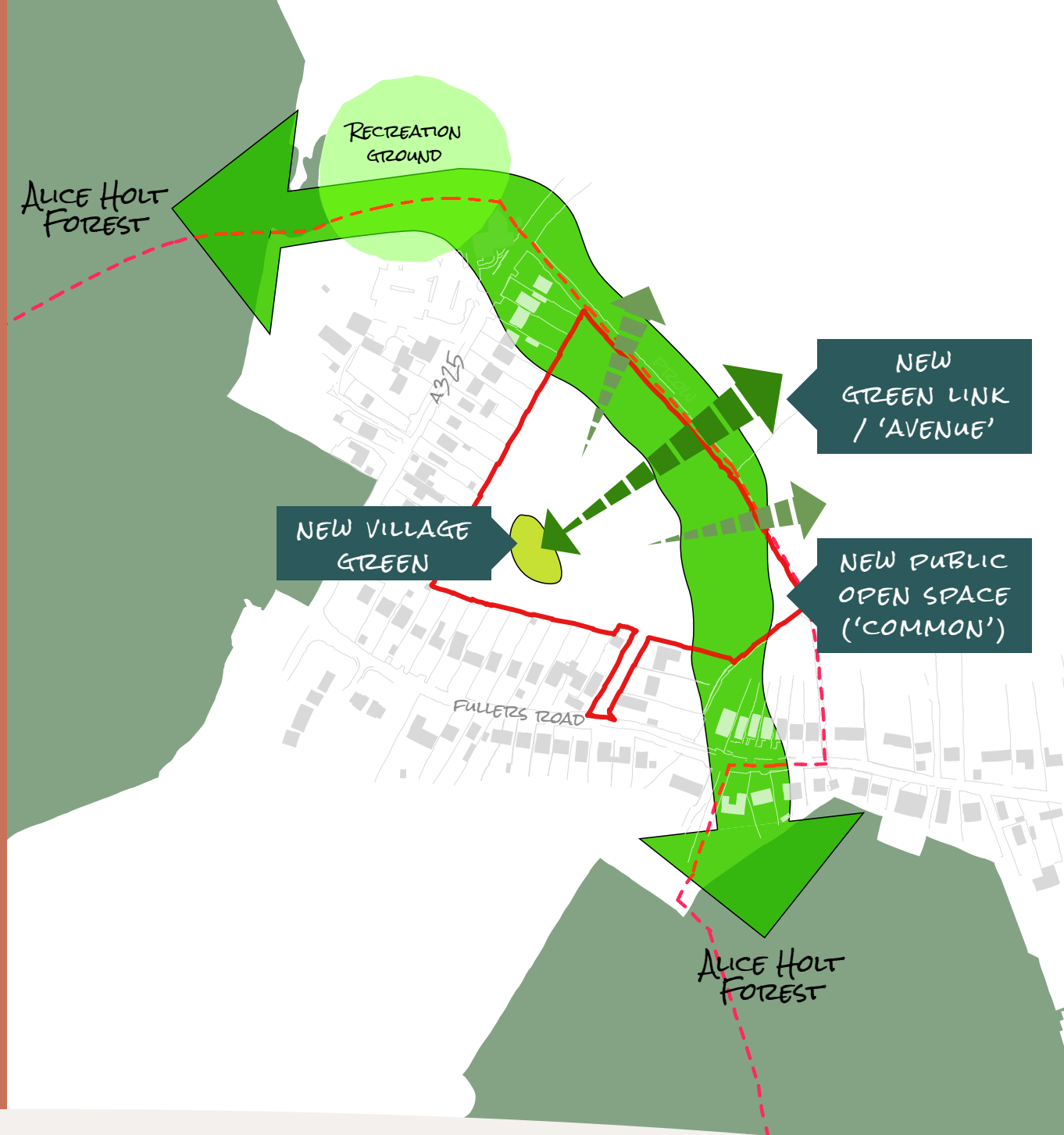


**COMMON**

**ROWLEDGE**



A new series of public open green spaces, as part of a wider network of connected public open spaces reflecting existing landscape and townscape character....

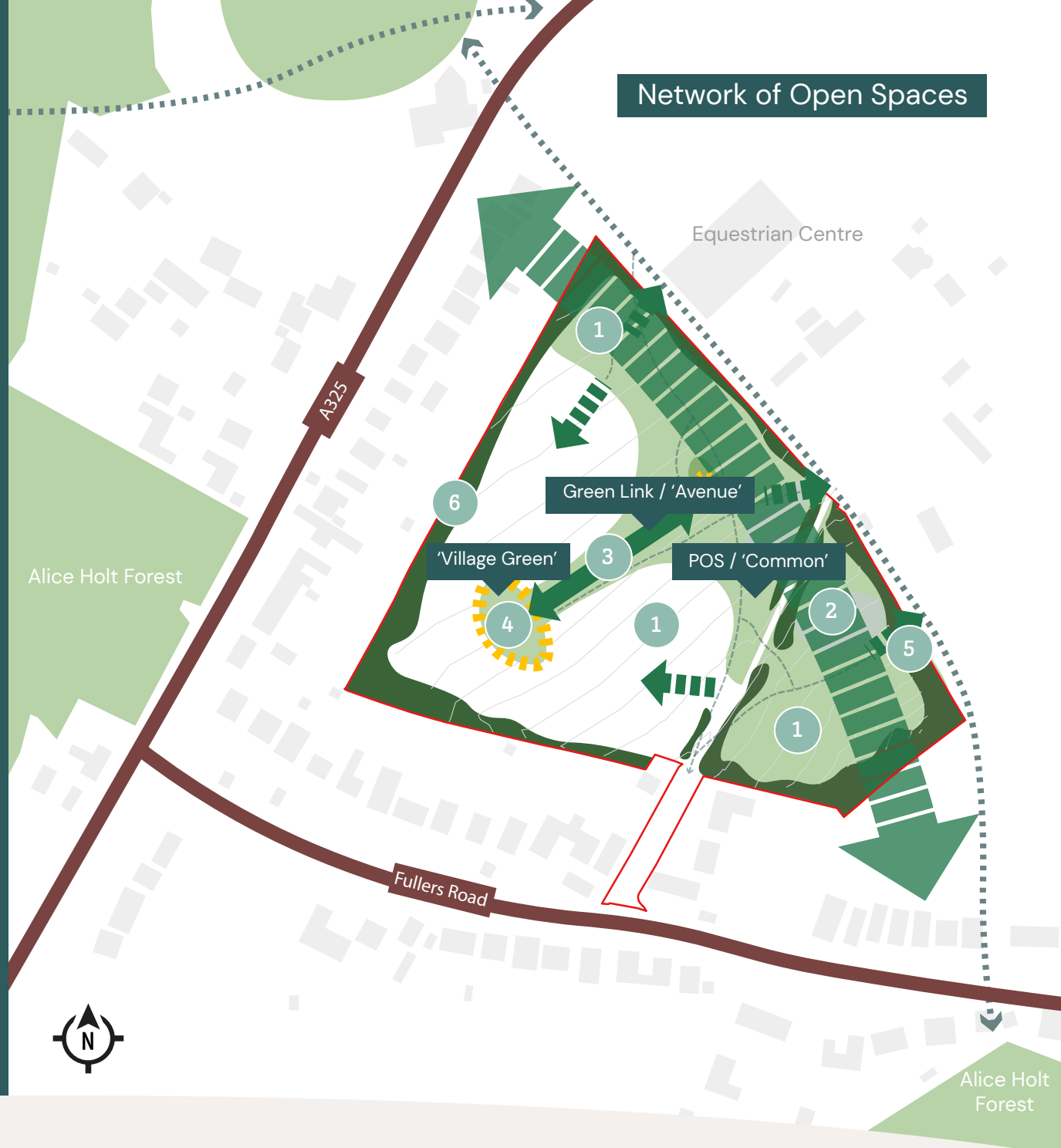




## LANDSCAPE

Our vision is landscape design led with the main principles highlighted below:

- 1 Creating a robust landscape framework by bringing nature into the scheme, whilst responding to the site topography and sensitivities. Ensuring that built form flows along contours and keeping the north-western part of the site free of development.
- 2 Creating a link between the two forest areas by providing a publicly accessible, open space / **common**, to incorporate native planting, informal recreation, edible landscape, drainage attenuation, whilst contributing to biodiversity enhancement.
- 3 Providing a robust green link in the form of a tree lined **avenue**, fronted by residential development.
- 4 Creating a **village green** with a more formal character as a focal point for the development and the wider community.
- 5 Retaining and enhancing the majority of existing trees and hedgerows.
- 6 Creating a more robust edge buffer to the adjacent properties.





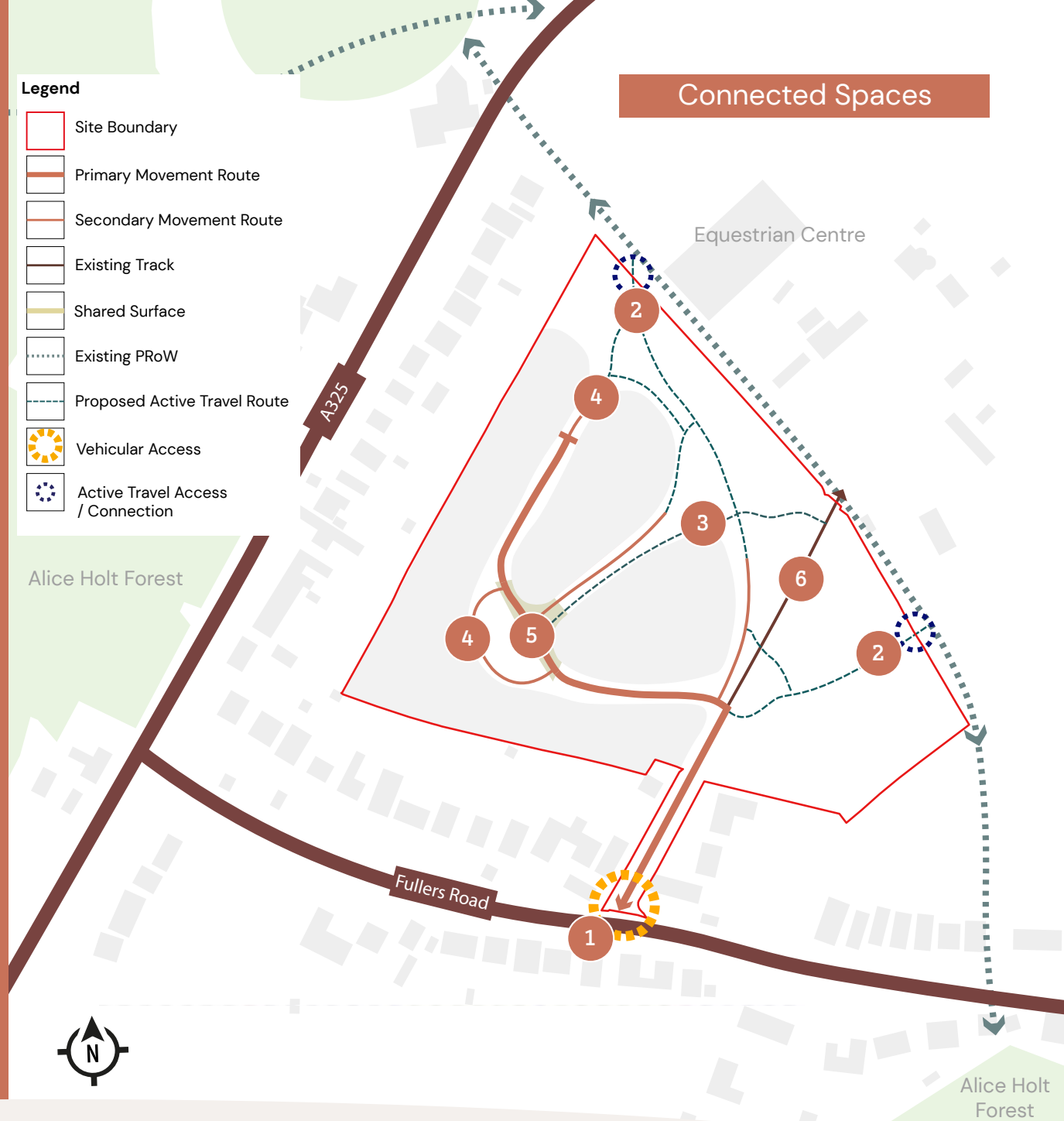
# CONNECTIONS

Our vision connects existing and new residents by:

- 1 Providing an access to the scheme off Fullers road, along the current upgraded track that serves the existing equestrian centre and neighbouring properties.
- 2 Providing pedestrian connections to the existing Public Right of Way that runs adjacent to the north-eastern / eastern site boundary.
- 3 Providing an extensive network of pedestrian movement routes that connect residents to the play area, publicly accessible open space and grow zones.
- 4 Creating a legible network of streets and spaces within the site. Downgrading the streets towards the more sensitive edges, so that the presence of cars is not dominant.
- 5 Downgrading the main movement route in front of the **village green** to give it a strong community character.
- 6 Maintaining the existing track for access to the equestrian centre and neighbouring properties and as an additional link to the Public Right of Way.

## Legend

- Site Boundary
- Primary Movement Route
- Secondary Movement Route
- Existing Track
- Shared Surface
- Existing PRoW
- Proposed Active Travel Route
- Vehicular Access
- Active Travel Access / Connection










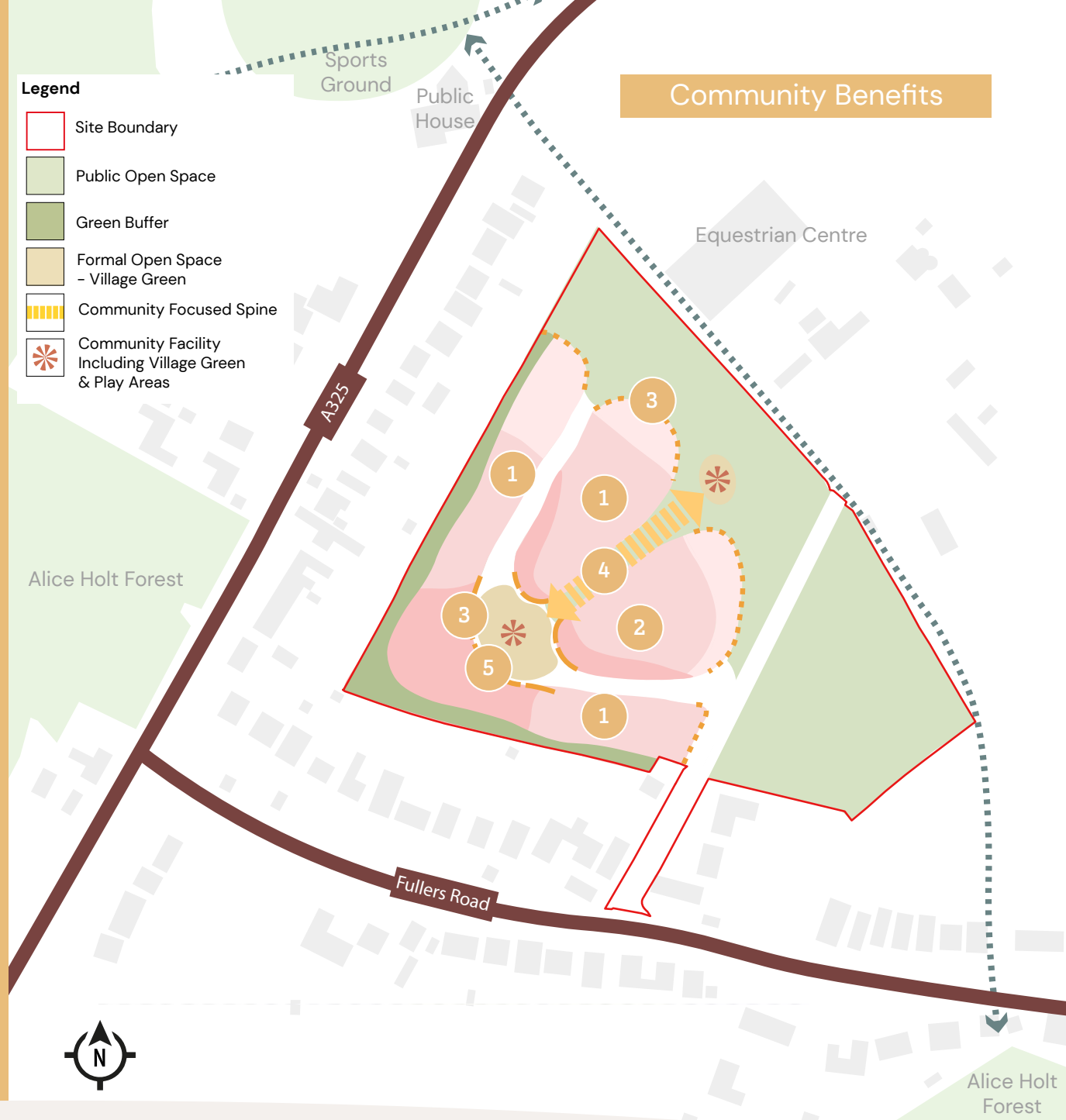
# COMMUNITY

Our vision promotes a visually attractive, characterful development that reinforces social cohesion by:

- 1 Creating a positive settlement edge for Holt Pound by completing the existing 'half blocks' (to deliver a full perimeter block) and allowing for two further perimeter blocks in the heart of the new scheme.
- 2 Creating visually attractive and legible streets, spaces, frontages and buildings that address the character of their adjacent open spaces and landscape, with reference to the local architectural vernacular.
- 3 Providing a looser built form edge along the public open space edge whilst creating a more continuous frontage that frames the more formal **village green**.
- 4 Establishing a community focused central spine of the scheme, with a well overlooked play area to the north and the village green to the south. A shared surface square to give an additional community focus to the central spine / **avenue**.
- 5 Carefully locating properties to create gateways, key corners and vista terminations.

## Legend

-  Site Boundary
-  Public Open Space
-  Green Buffer
-  Formal Open Space - Village Green
-  Community Focused Spine
-  Community Facility Including Village Green & Play Areas



## Community Benefits



04.

# Illustrative Layout





## BRINGING THE LANDSCAPE INTO THE SCHEME

- 1 Existing vegetation retained and enhanced within the site.
- 2 Native tree and shrub planting to create robust landscape framework.
- 3 Street trees to create a green street character along the 'avenue'. Hedgerow boundaries to line streets.
- 4 Well overlooked, informal woodland play to the north of the scheme, within the public open space / 'common'.
- 5 Informal grow zones and community orchard in key locations within public open space and private amenity space.



## CONNECTING EXISTING & NEW RESIDENTS

- 6 Extensive network of pedestrian movement routes that provide links to the adjacent public right of way, as well as to the public open space to the north of the scheme.
- 7 Downgraded main movement route in front of the village green to be treated as a shared surface with a community character and feel.
- 8 Downgraded streets along the more sensitive edge to the north.
- 9 Access to the scheme off Fullers road, by upgrading the southern part of the existing track.



## REINFORCING IDENTITY & PROMOTING BEAUTY & SOCIAL COHESION

- 10 A series of well placed and designed legible streets and spaces that are visually attractive and inspired by the local urban and landscape character.
- 11 Looser built form edge along the public open space, with detached houses fronting it.
- 12 More continuous built form around the village green with smaller houses and a more defined frontage.
- 13 Successful vista termination at the end of the 'avenue'.
- 14 Local building features at site entrances, around the 'village green' and along the 'avenue'.







EXISTING PROW

THE KILN EQUESTRIAN CENTRE

A325

FULLERS ROAD



Indicative Land Budget		
Land Use	Area (Ha)	Percentage
Site Area	3.84	100%
Net Developable Area	2.03	53%
Public Open Space **	1.75	45.49%
Existing Track	0.06	6.25%

\*\* including SuDS

**EXISTING SCALE**  
 Mix of 1, 1.5, 2, 2.5 storey houses along A325 / Fullers Road.

**PROPOSED SCALE**  
 Predominantly 2 storey houses, occasionally 2.5, working with the existing topography.

**ACCESS**  
 Upgrade existing track to Fullers Road with new connections to PRoW, improving permeability for walking and cycling.

**GREEN INFRASTRUCTURE**  
 Existing mature field boundary hedgerows and trees retained and enhanced, including biodiversity and BNG improvements.



**EXISTING RESIDENTIAL AMENITY**  
 Respected by retaining and enhancing existing boundary planting and increased back-to-back distances.

**DENSITY**  
 Optimised through making efficient use of land, whilst delivering contextually appropriate form consistent with the existing pattern and character.

**SURFACE WATER DRAINAGE**  
 Minimised and mitigated with SUDs basins integrated into new public open space.

**PUBLIC OPEN SPACE / LANDSCAPE LED DESIGN**  
 Significant amount of new, green POS, with community benefits as part of a public network of footpaths and open spaces reflecting the existing townscape character and pattern.







05.

# Conclusions

This document sets out a high level vision for land north of Fullers Road, Holt Pound, Rowledge, on behalf of Cala Homes and should be read in conjunction with all other submitted representations.

It illustrates how a quality new residential community can be delivered in a sustainable location, with its underlying design principles evolving from an appreciation of its landscape context and character.



APPENDIX 1

# Landscape Technical Note

## Introduction

The Site is located in a peri-urban area on the edge of Holt Pound and Rowledge. The local area comprises a mixture of built-up residential, leisure and light industry uses and areas of woodland, farmland and other open space.

The Site lies approx. 140m from the boundary of the South Downs National Park; the closest part of the National Park to the Site comprises mainly a wooded and agricultural landscape with frequent small settlements and numerous public recreational routes and facilities. The Site is not considered to have any strong connection to the National Park, although PRoW O20/49/1 which runs along the north-eastern / eastern Site boundary forms a pedestrian connection between two areas of the National Park.

The Surrey Hills National Landscape (formerly AONB) is located approx. 2km to the east of the Site. The Site has no inter-visibility or other links to this National Landscape.

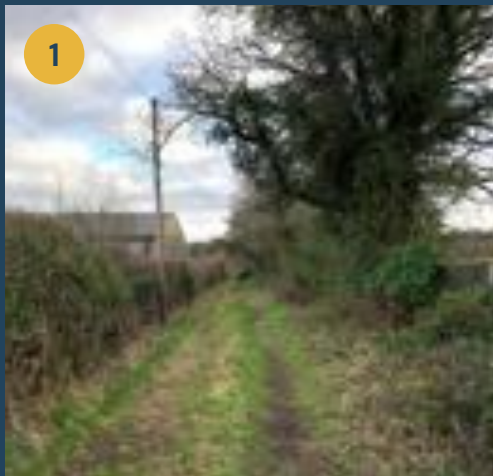
There are a number of listed buildings and SSSIs in the wider study area, however none of these fall within the immediate context of the Site and are not considered to have any relationship to the Site.

## Site Landscape Character

The site comprises two equestrian paddocks sloping down towards a stream on its south-eastern boundary. Boundaries are generally mature hedgerows with hedgerow trees, with some fencing on the boundary to residential properties to the west.

The site is characterised by peri-urban pasture, and is strongly influenced visually and perceptually by the adjacent residential properties and A325 road despite elements which are a remnant of a more rural landscape such as mature hedgerows with mature hedgerow trees.

1. Part of Public Footpath O20/49/1 adjacent to the Site
2. Looking across the Site towards a localised ridgeline
3. Looking across the Site towards residential properties on the A325
4. Fuller's Lane





## Landscape Character: Surrounding Area


The surrounding area comprises a mixture of urban and suburban settlement, with occasional single houses and farmsteads. As well as residential properties, there are other land uses present such as the Ball and Wicket pub, Bird World, small industrial parks and garages, schools and recreation grounds. Between built up areas and woodland, there are pockets of farmland, paddock and recreational open spaces. The area has numerous tree belts, small woodlands and larger plantations.

Topography in the local area comprises a number of ridges and small valleys. Combined with a well-treed landscape, this often leads to a secluded and enclosed landscape character.

Similarly to the East Hampshire Lowland Mosaic LCA, the Site and its immediate surroundings have short and wooded visual horizons, drained by small streams and is well-wooded beyond the Site, surrounding residential properties and small pockets of farmland. There are also numerous publicly accessible spaces and public rights of way in the area, including the footpath which runs along the north-eastern boundary of the Site (Footpath O20/49/1).



### LEGEND

-  Site Boundary
  -  County Boundary
  -  South Downs National Park
  -  10m Contours
  -  Watercourses
  -  Public Rights of Way
- Not to scale 

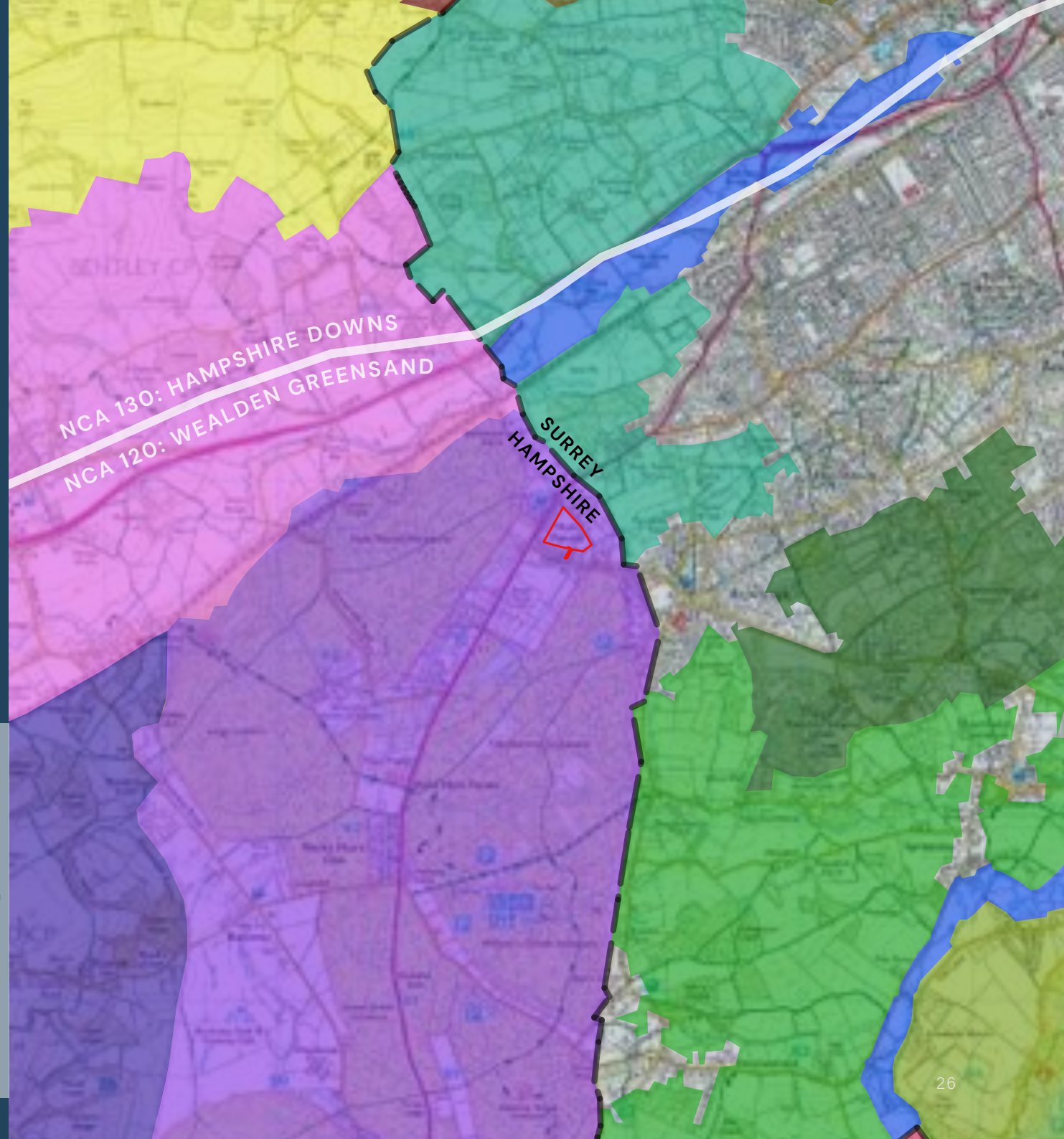


## Landscape Character: Published Assessment



The Hampshire Landscape Character Assessment (2012) defines landscape character areas (LCAs) and types across the county. The Site is located within the East Hampshire Lowland Mosaic LCA, the key characteristics of which include:

- a low-lying clay vale
- well-wooded in the north (where the Site is located, with more farmland and grassland in the south)
- drained by numerous small streams
- a mixture of woodland habitats
- short and wooded visual horizons
- varied tranquillity, with the north being more tranquil and less influenced by the A3
- Accessible woodland common in the north, and a strong network of public rights of way

The Site lies close to the county boundary; landscape to the east of the Site is covered by the Surrey Landscape Character Assessment (2015).



### LEGEND

	Site Boundary		Dockenfield to Millbridge
	County Boundary		Open Greensand Hills
	National Character Area (NCA) Boundary		West Farnham Open Greensand Hills
Hampshire Landscape Character Assessment (2012) Landscape Character Areas:			Upper Wey River Floodplain
	East Hampshire Lowland Mosaic		North Farnham Rolling Clay Farmland
	Wey Valley		Rowledge to Tilford Wooded Greensand Hills
	East Hampshire Hangers and Greensand Terrace		Frensham to Witley Common Wooded Greensand Plateau
	North East Hampshire Open Downs		
	North East Hampshire Plantations and Heath		



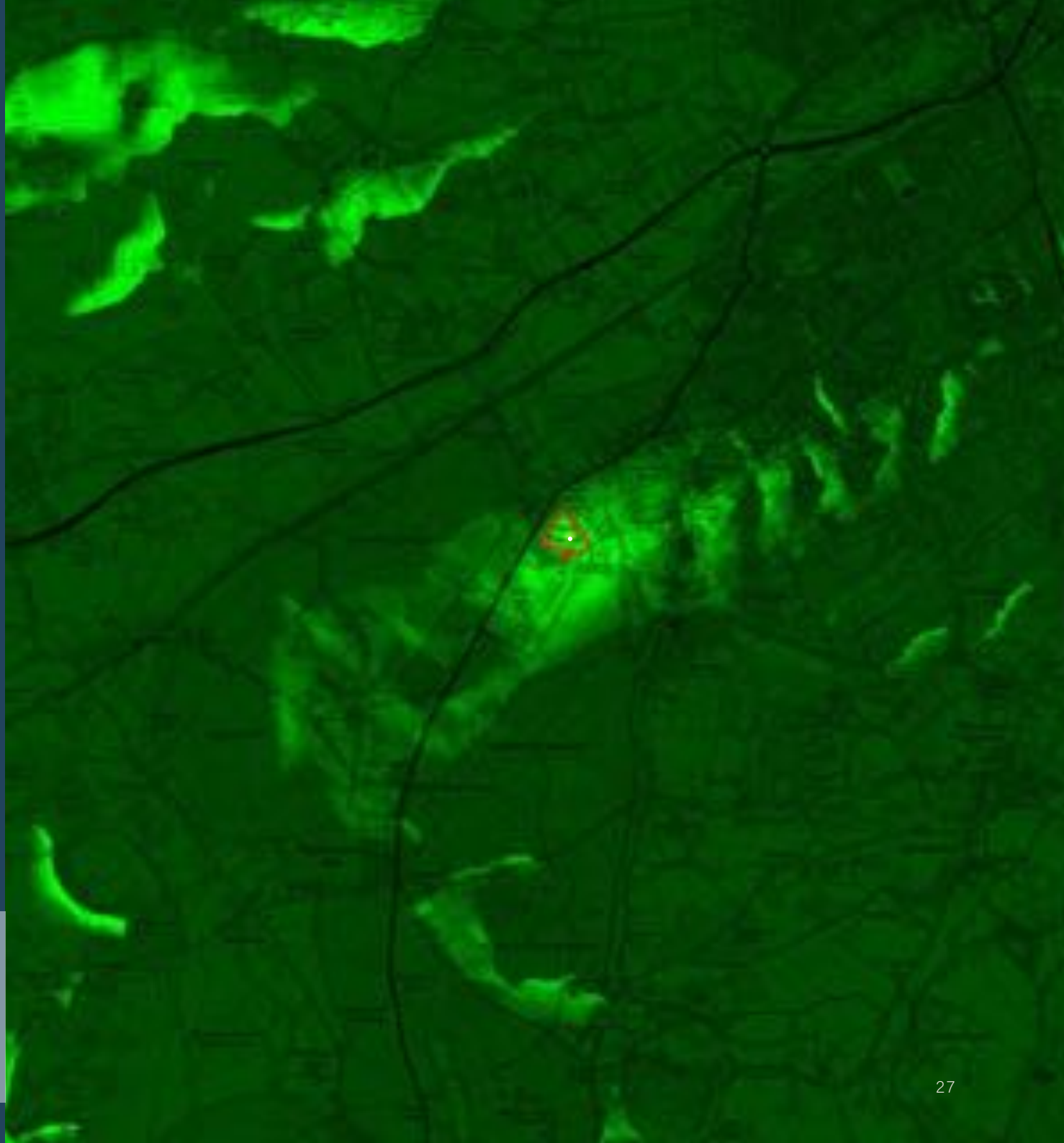
## Visual

The landscape surrounding the Site is generally well-treed, with areas of woodland, hedgerow trees and vegetation belts common. Combined with the varied topography of localised ridgelines and valleys and frequent built form in the area, visibility is limited across much of the surrounding area.

In the area immediately surrounding the Site, visibility into the Site is limited by vegetation lining the A325 and the boundary of the Site, and built form along the A325 and Fullers Road. There are glimpsed, oblique views from the A325 and Fullers Road between the built form and vegetation. There are views into the Site from Footpath O20/49/1 on the north eastern boundary of the Site.


As Zone of Theoretical Visibility (ZTV) mapping indicates, topography also reduces visibility across the landscape and views into the Site from the wider landscape. Areas highlighted to the east, south-west and north-west by the ZTV are considered unlikely to experience views into the Site due to intervening built form and vegetation.


The Site does not have a strong visual connection to the South Downs National Park due to intervening vegetation, built form and landform. It is also not considered to have any visual relationship to the Surrey Hills National Landscape (formerly AONB). The Site is understood not to form part of a view recorded as being of importance in relation to any heritage assets, nor is it understood to form part of any view recorded in art, literature or other media for its particular special qualities. The Site is also not visible from any locations well known, or publicly accessible; and is understood also not to form part of any views which appear in Ordnance Survey, tourist maps or guide books.



### LEGEND

 Site Boundary

 ZTV Target Point (9m above ground)

 Visibility more likely

↓  
 Visibility less likely



ZTV based on DTM and is used to show a worst case likely visibility of the existing site and is to be used only to guide representative viewpoint positions





# Key Views into the Site





APPENDIX 2


# Planning Policy Compliance

Appendix 3

Draft EHDC Planning Policy - Density & Local Character



*EHDC Draft Planning Policy DES3.1*

*“Residential development proposals within settlement policy boundaries and on allocated sites must optimise the density of new residential uses through making an efficient use of land, whilst delivering a contextually appropriate and coherent built form.”*

<b>Planning Policy / Draft Planning Policy:</b>	<b>Existing context:</b>	<b>Illustrative layout response / proposed:</b>	<b>Evidence / example:</b>
<b>Density</b>	<p>Existing housing adjacent to the site along the A325 / Fullers Road has a range of densities.</p> <p>Adjoining houses are mostly detached properties set in large plots - which deliver low density in terms of dwellings per hectare (DPH).</p>	<p>Density has been optimised to make efficient use of land for development, whilst delivering new public green open spaces, and creating a sustainable mixed community, with property sizes varying from 1-bed to 4+bed.</p>	
<b>Consistent with predominant pattern of development for streets and blocks</b>	<p>Existing houses along A325 / Fullers Road form a linear development, facing on to the road (west and south). Rear gardens are adjacent to existing field (east and north), with garden fence boundaries creating a ‘half block’, which is open to the rear.</p>	<p>The proposal seeks to deliver perimeter blocks of development. Therefore the new building line includes running development parallel with the existing linear A325 / Fullers Road houses and is consistent with and completes the block.</p> <p>This delivers good design principles with clear public front facing / private rear facing development.</p>	 <p>Proposal respects and completes the block.</p>
<b>Building line position and compliance</b>	<p>Existing housing in the environs are predominately of detached houses and are set-back from the road on relatively large (but narrow) rectilinear plots.</p>	<p>Proposed housing is a mix of detached, semi detached and apartments. Building lines are set back from the road frontage which also allows opportunity to include green infrastructure into the street scene.</p>	<p>Refer to illustrative layout.</p>

## EHDC Draft Planning Policy DES3.1

*“Residential development proposals within settlement policy boundaries and on allocated sites must optimise the density of new residential uses through making an efficient use of land, whilst delivering a contextually appropriate and coherent built form.”*

Planning Policy / Draft Planning Policy:	Existing context:	Illustrative layout response / proposed:	Evidence / example:
<b>Height to width ratio for streets</b>	<p>Houses to the south of Fullers Road are predominately single / two storey, with those to the north being typically two storey.</p> <p>To the south of Fullers Road the topography falls away, as such these houses sit below street level and therefore when viewed from the road are low scale.</p>	<p>A 1.3 ratio for building height to street width is often cited for a sense of enclosure. However, due to the openness of Fullers Road, a appropriate ratio of building height to street width will need to be developed for delivering new development.</p> <p>New streets will be large enough to accommodate green infrastructure that will help provide effective climate resilience.</p>	 <p>Existing low height of houses to the south of Fullers Road</p>
<b>Back-to-back distances</b>	<p>Existing houses facing A325 / Fullers Road have a rear garden length of circa 20+ metres which delivers large rear gardens.</p>	<p>The proposal seeks to complete the perimeter block. Therefore we will provide appropriate back-to-back distances, respecting existing vegetation and include an enhanced landscape buffer along existing fence line.</p>	<p>Refer to illustrative layout.</p>
<b>Plot coverage</b>	<p>Plot coverage means the extent to which the plot is covered with a building or structure. Typically there are large detached houses, set back back from the road, on large plots.</p>	<p>Large existing private garden sizes will not be replicated, as this does not optimise efficient use of land; however approximately half of the site is proposed a public open (green) space for the benefit of all the community.</p>	<p>Refer to illustrative layout.</p>
<b>Building heights &amp; massing</b>	<p>In scale terms, existing houses are single, 1.5, two storey and some 2.5 storey along Fullers Road.</p> <p>In terms of massing many existing pitched roofs include hips, which visually reduce the overall mass of the buildings.</p>	<p>Proposed housing is 2 storey in height with potential only 2.5 storey to the apartment building.</p> <p>Pitched roof forms will include hips which pick up on the local townscape vernacular and character.</p>	 <p>Existing 2.5 storey houses along Fullers Road (some with hipped roof)</p>

EHDC Site Allocations - LAA Reference BIN-005 - HOP 1 - Land north of Fullers Road, Holt Pound

EHDC List of constraints and opportunities	EHDC issue raised:	Illustrative layout response / proposed:	
<b>Biodiversity:</b>	<i>“recreational impacts on the Wealden Heaths Phase I Special Protection Area would need to be appropriately mitigated.”</i>	This important issue would be further considered and covered in the emerging proposals and potential future planning application.	
<b>Flood risks:</b>	<i>“small parts of the site are susceptible to surface water flooding. These flood risk areas are in the southern and eastern parts of the site, notably associated with the adjoining watercourse”</i>	<p>The illustrative layout indicates development some distance away from the adjoining watercourse and therefore outside and clear of the flood zone.</p> <p>Proposals include blue and green infrastructure, with SUDs drainage attenuation basins integrated into the landscape led design that will help with managing existing surface water.</p>	
<b>Landscape:</b>	<i>“there is potential for adverse landscape and visual impacts including on the setting and context for the South Downs National Park”</i>	<p>Development would locally reduce visibility to the South Downs National Park from the footpath, which borders the site to its north. Importantly the site is however almost entirely screened in views from locations within the National Park and proposed development would be viewed in context with other intervening built form at its margins.</p> <p>Views toward the development site from the footpath are glimpsed and any introduced development would typically be viewed in combination with existing residential built form. The development proposals are envisaged also to increase tree cover within the site and support public access through the provision of new connections.</p> <p>Proposed development is accordingly considered not to cause any material harm to landscape or visual amenity and is anticipated not to materially harm the setting of the South Downs National Park.</p> <p>This would be further considered and covered in the emerging proposals with a LVIA as part of a potential future planning application.</p>	



EHDC Site Allocations - LAA Reference BIN-005 - HOP 1 - Land north of Fullers Road, Holt Pound			
EHDC List of constraints and opportunities	EHDC issue raised:	Illustrative layout response / proposed:	
<b>Green infrastructure:</b>	<i>“mature field boundaries and trees are important characteristics of the site, helping it to integrate with the wider landscape”</i>	Existing mature hedgerows and trees would be retained and enhanced as part of the landscape led proposals. There is a significant amount of new public green space proposed, as part of a public network that reflects existing townscape character and pattern.	
<b>Access:</b>	<i>“connection to the local road network could be achieved via the existing track to Fullers Road...”</i>	Vehicle access is proposed via upgrading the existing track off Fullers Road.	
<b>Access:</b>	<i>“potential to connect the site to the public right of way, improving permeability for walking and cycling modes and enabling active and healthy lifestyles”</i>	The illustrative layout highlights a number of new public rights of way routes through the site, linking Fullers Road to the existing footpath to the north, promoting active travel.  The new green public open space delivers community benefit with a public network of footpaths reflecting existing townscape character and pattern.	
<b>Residential amenity:</b>	<i>“due to proximity of adjoining dwellings to the south and west, there is potential for adverse impacts on the amenity of existing houses on Fullers Road and the A325”</i>	The proposal seek to complete the perimeter block with garden lengths / sizes in excess of standards and that are inspired by local context.  Therefore back-to-back distances (including those parallel with Fullers Road / A325) will exceed minimum standards and will also include enhanced landscape buffer along existing fence line, minimising any adverse impacts on the amenity of existing houses.	
<b>Built heritage:</b>	<i>“no designated constraints to development”</i>	Noted.	



**Define.**

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**NATURAL ENGLAND DISCRETIONARY ADVICE SERVICE: LAND AT HOLT POUND, ROWLEDGE: DAS 14085 FALCON DEVELOPMENTS 25/03/19**

**Pre-application advise following a document review and telephone discussion:  
[REDACTED] ead Advisor Planning and Conservation**

**Advice re**

Thames Basin Heaths SPA

Thursley, Hankley & Frensham Commons -Wealden Heaths Phase I SPA

Broxhead and Kingsley Common –Wealden Heaths Phase II SPA

Natural England advises that this proposal can be screened out from requiring a Habitat Regulations Assessment in relation to the above European Sites. If one were undertaken Natural England supports the conclusion of the Ethos information to support Habitat Regulation Assessment that this proposal is not likely to have a significant effect as follows:

1. The proposal for 48 homes is outside the 5km recreational impact risk zone of the Thames Basin Heaths and Wealden Heaths II SPA described by the appropriate Local Authority planning policy and can be screened out from requiring a Habitat Regulation Assessment.
2. The proposal is not considered to require a Habitat Regulations Assessment in relation to the Wealden Heaths I SPA site, Frensham Common, within Waverley Borough Council. This judgement is based upon the following proposed features of the development
  - a. The proposal is for a small-medium development of under 50 homes within a rural area that is around 4km distant from Frensham Common.
  - b. A larger than usual area of public open space of around 2-3ha will be provided within the development site (it is not necessary or correct to describe 0.93ha of this as SANG).
  - c. The proposal site is very well-served with local walking opportunities including a 260m walkable footpath connection to the large Alice Holt Forest public space to the west and a recreation ground to the east.

*The advice provided above is the professional advice of the Lead Advisor Claire Lambert. It is the best advice that can be given based on the information provided. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response, or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until any planning application, or wildlife licence application, is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge / evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England*