



# Land at Five Acres, Ropley Dean

Representation to East Hampshire Local Plan  
Regulation 18 Consultation

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

**REPORT CONTROL**

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## **TABLE OF CONTENTS**

<b>1. Introduction</b>	<b>3</b>
<b>2. Spatial Strategy and Housing Requirement</b>	<b>5</b>
The Appropriate Housing Requirement (2021/22 – 2022/23)	5
The Appropriate Plan Period	6
Unmet Need & the Duty to Cooperate	7
Affordable Housing	8
Supporting the Vitality and Viability of Smaller Villages	9
Summary	10
<b>2. Proposed Plan Policies</b>	<b>12</b>
<b>3. Land At Five Acres, Ropley Dean</b>	<b>16</b>
<b>4. Site Specific Evidence Base</b>	<b>18</b>
<b>5. Conclusion</b>	<b>22</b>

## **APPENDICES**

**Appendix 1. Site Location Plan**

# 1. INTRODUCTION

1.1 Boyer has prepared these representations on behalf of Cala Homes (Thames) Ltd (hereafter referred to as Cala) in response to East Hampshire District Council's (the Council) 'Regulation 18' consultation on the 'Draft Local Plan 2021-2040' (the 'Draft Local Plan'), undertaken from 22 January to 4 March 2024.

## Scope of Representations

1.2 These representations are made with respect to the ongoing promotion of the Land at Five Acres, Ropley Dean ('the Site') (see **Appendix 1** for a site location plan), over which Cala holds a specific land interest, for a residential-led development. These representations are aligned with this land interest and address topics within the Draft Local Plan consultation and its supporting evidence base accordingly.

1.3 The purpose of these representations is to assist the Council in formulating an approach within the emerging Draft Local Plan that is both consistent with national planning policy and the *tests of soundness*. In this regard, our representations relate to the tests of soundness set out at paragraph 35 of the National Planning Policy Framework ('NPPF') (2023); namely whether the emerging plan is:

- 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** – representing 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 a/the statements 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.

1.4 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 Representations

1.5 The structure of our representations seeks to respond to the specific format of the Draft Local Plan consultation. Our representations are set within the context in which we seek to highlight, where relevant, the opportunities that are presented by the proposed allocation of the site for development.

1.6 Accordingly, the following sections of these representations are set out as follows:

**Section 2:** Spatial Strategy and Housing Requirement

**Section 3:** The Land at Five Acres, Ropley Dean

**Section 4:** Summary and Conclusions

1.7 We trust that our comments are of assistance in the Council formulating an approach for the emerging plan that is positively *prepared, effective, justified, and consistent with national policy*.

1.8 Cala firmly contends that the Draft Plan, at this stage, sets out an approach that appears to be exposed to being found *unsound*. The reasons supporting this view, and our recommendations to resolve these concerns, are set out in the following sections of these representations.

## 2. SPATIAL STRATEGY AND HOUSING REQUIREMENT

- 2.1 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.
- 2.2 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.
- 2.3 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.
- 2.4 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*.
- 2.5 Cala is further concerned that the Spatial Strategy does not provide for sufficient growth at the District's lower-tier settlements, such as Ropley Dean, 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 site to maintain a deliverable land supply.
- 2.6 To assist in redressing these concerns, Cala promotes the Land at Five Acres, at the Settlement of Ropley Dean, as detailed elsewhere in these representations. Our view is that the allocation of Land at Five Acres, Ropley Dean, for residential development, will assist in preparing a *sound* Spatial Strategy. The reasons for this are detailed below.

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

- 2.7 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.
- 2.8 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).

- 2.9 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.
- 2.10 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.
- 2.11 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.
- 2.12 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**

- 2.13 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.
- 2.14 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.
- 2.15 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

- 2.16 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.
- 2.17 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.
- 2.18 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

- 2.19 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.
- 2.20 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>.
- 2.21 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.
- 2.22 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).
- 2.23 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.

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

- 2.24 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*.
- 2.25 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.
- 2.26 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.
- 2.27 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.
- 2.28 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 Land at Five Acres, Ropley Dean, should be allocated for residential development. As set out in Section 3 of this report, the site is *available, suitable*, and is *achievable* in the early years following the Plan's adoption.

### **Affordable Housing**

- 2.29 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.
- 2.30 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.

- 2.31 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.
- 2.32 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.
- 2.33 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...'.
- 2.34 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...'.
- 2.35 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.
- 2.36 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**

- 2.37 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.
- 2.38 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 village of Ropley Dean

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



2.39 Indeed, under the adopted spatial strategy, just 42 dwellings were allocated across 4 sites to support the sustainable growth of Ropley Dean over the 17-year period 2011 – 2028, equivalent to just 2.5 dwellings per annum over the period. Given the scale of the settlement, Ropley Dean is capable of supporting, and would benefit from, continued growth throughout the emerging plan period.

2.40 However, the Draft Local Plan does not propose to include a single allocation to support the settlement's growth. This omission is inconsistent with national policy; 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...'*

2.41 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.

2.42 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 delivering across the plan period.

2.43 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 allocation of further smaller sites, such as the land at Five Acres, Ropley Dean 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.

2.44 In this regard, Cala advocates that the Council should allocate the Land at Five Acres, Ropley Dean, for residential development 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 neglects to include any support for the plan-led sustainable growth of Ropley Dean. In our view this should be rectified moving forward.

### **Summary**

2.45 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 support the sustainable growth of the District's rural settlements, such as Ropley Dean.

- 2.46 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*.
- 2.47 To assist with addressing the issues set out above, Cala promotes the allocation of the Land at Five Acres, Ropley Dean, 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.
- 2.48 The site provides an opportunity for a *deliverable* residential-led development scheme of approximately 36 dwellings to provide for a reasonable amount of the District's needs for market and affordable housing.

## 2. PROPOSED PLAN POLICIES

### Chapter 4 – Responding to the Climate Emergency

- 2.1 Chapter 4 (Responding to the Climate Emergency) sets out the Draft Plan's strategy for EHDC becoming a net-zero carbon authority.
- 2.2 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.
- 2.3 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.
- 2.4 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.
- 2.5 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.
- 2.6 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.
- 2.7 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.
- 2.8 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.
- 2.9 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.

- 2.10 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.
- 2.11 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.
- 2.12 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.
- 2.13 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.
- 2.14 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**

- 2.15 Whilst Cala support the Council 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.
- 2.16 However, the Council 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.

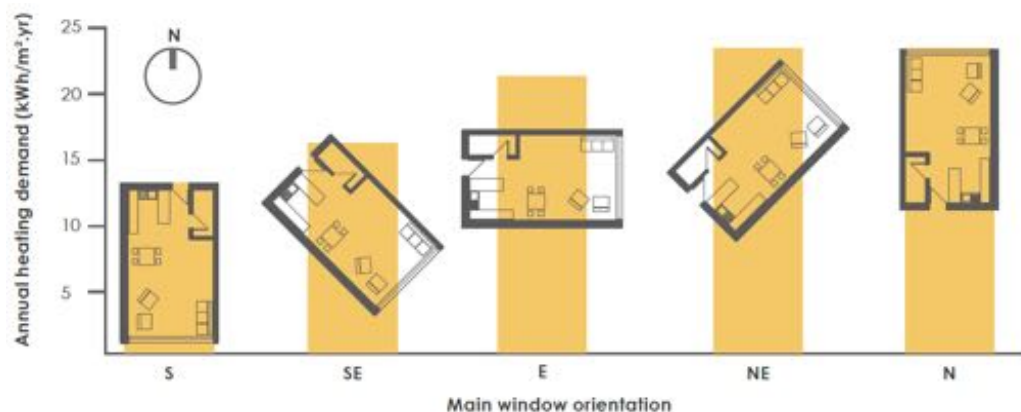
## Chapter 6 – Creating Desirable Places

- 2.17 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 environments.

### Policy DES1: Well-Designed Places

- 2.18 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.
- 2.19 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



- 2.20 Therefore, Policy DES1 should recognise that requirements of the energy hierarchy are ‘balanced’ with design and landscape considerations.
- 2.21 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 DES4: Design Codes

- 2.22 We support Policy DES4 (Design Codes) and its aim of encouraging the preparation of a design code(s) for the District area, and also welcome the opportunity to prepare design codes for smaller geographies where relevant.

- 2.23 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**

- 2.24 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**

- 2.25 Cala agrees that the Draft Local Plan must deliver a range of house types and sizes to meet identified housing needs.
- 2.26 Cala also acknowledge the concerns set out by the Council in respect of the operation of the First Homes initiative as identified in paragraph 9.59 of the supporting text. Cala support the intention of the Council 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.
- 2.27 Cala would however assert that reference to First Homes and the flexibility proposed should be referenced explicitly within the wording of the Policy rather than solely the supporting text.
- 2.28 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).
- 2.29 The flexibility to discuss appropriate solutions on an individual site basis is supported. However, the Council 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.

### 3. LAND AT FIVE ACRES, ROPLEY DEAN

- 3.1 The land at Five Acres, Ropley Dean has the potential to accommodate a high-quality development of much needed new homes, which would comprise a logical extension to the village of Ropley Dean. Indeed, the site was included by the Council in an earlier iteration Regulation 18 consultation (in 2018) draft plan document.
- 3.2 The Site (**Appendix 1**) comprises a parcel of land of approximately 2.1 hectares. To the north the Site's boundary is shared with the boundary of the Mid Hants railway line and Ropley station (and associated development). To the east the boundary is denoted by a post and wire fence beyond which is an undeveloped parcel of agricultural land. To the south the Site shares its boundary with existing residential development served off Darvill Road / Station Hill whilst to the west the boundary is defined by hedgerows which front Station Hill.
- 3.3 The site has a gradient change sloping up to the north away from Ropley Dean. The Site is mapped to be fully within Flood Zone 1 for fluvial and surface water risk. There is a public right of way which intersects and passes through the Site.
- 3.4 There are a range of services and facilities close to the Site which are sufficient to serve many of the local communities everyday needs as well as potential for employment opportunities. The site has good car and bus links to nearby towns and larger villages, including a regular bus service to Winchester and Alton. The larger villages of Ropley, Four Marks and New Alresford are all accessible by bike and bus services.
- 3.5 Cala have previously provided the Council with a Vision Document presenting a high-level understanding for the Site's potential to deliver a high quality, landscape-led development of up to 36 new homes in 2019.
- 3.6 The Site has the potential to deliver an appropriately sustainable development at Ropley Dean, providing for:
- A high quality and well-designed development that would be delivered by Cala Homes.
  - The development would be landscape-led settling within an attractive landscaped setting, complementing and respecting the established character of the village.
  - The Site can deliver up to 33 high-quality, sustainably constructed and resource efficient, well-designed homes providing a range of housing types, sizes and tenures aligned to the District's housing needs
  - The Site can provide much-needed affordable homes, compliant at the minimum with policy requirements
  - The concept masterplan includes providing a sizeable area of landscape public open space as part of the development, overall 43% of the Site would comprise green infrastructure including the new public open space, landscaped buffer, retained trees and hedgerows, etc.

- Delivering biodiversity improvements as part of the Site's development.
- 3.7 The Site is available now and new homes could be delivered, following the Site's allocation in the Council's next Local Plan, in the early years following adoption of the District's next local plan.
- 3.8 Modest levels of growth are important to ensuring rural villages and communities can maintain themselves and thrive. Development of the site would make a meaningful contribution to local housing needs and make a positive contribution to the social and economic vitality of Ropley Parish. We encourage the Council to revisit its current omission of the Site within the latest Regulation 18 Draft Local Plan.
- 3.9 Cala would be glad to meet with Officers of the Council in the coming months in order to discuss the genuine opportunity the Site presents for allocation in the District's next adopted local plan.



## 4. SITE SPECIFIC EVIDENCE BASE

- 4.1 The *Integrated Impact Assessment (IIA) for the East Hampshire Local Plan (2024)* identifies a list of sites that have been assessed and then 'sieved out' for the process of determining which sites have been chosen for allocation in the current Draft Local Plan. The IIA assesses each site against a set of defined objectives. Within the IIA's list of sites the land at Five Acres is identified as site ref. ROP-010.
- 4.2 Having reviewed the IIA methodology, whilst it is not explicitly presented in the document, it appears the Site (ROP-010) has been sieved out specifically on one ground, but otherwise would have been on two grounds. The first ground appears to be a result of the Site being located outside of a defined settlement policy boundary (SPB) wherein paragraph 4.6.5 of the IIA states – *'...in all instances, sites which do not comply with the overall housing strategy for the draft Local Plan, that is they do not fall within the boundary of one of the those settlements set out within the settlement hierarchy, have been excluded from allocation...'*. The second basis, by assumed inference to the statement made in footnote 12 referred in the same paragraph of the IIA, is that the Site would have been sieved out on the grounds it has been assessed to score more than one double-negative score against the IIA's 12 assessment objectives or more than 3 single negative scores.
- 4.3 Regarding the sites' relationship with the settlement boundary, Cala are disappointed to see this approach has now been employed to the detriment of sieving out the Site. The settlement boundary is clearly a matter within the Council's control to resolve through the new local plan by way of undertaking and making a reasonable amendment to the Village's existing defined settlement boundary/area. This was clearly the expectation at the time of the last Regulation 18 Consultation undertaken in early 2019 when the Site was included as part of the proposed allocation given reference Site SA30.
- 4.4 Furthermore, undertaking a settlement boundary amendment as part of the Site's allocation can be achieved in accordance with the current Draft Local Plan's overall spatial strategy. Within Draft Policy S2, Ropley Dean is one of the identified settlements falling within Tier 5 of the settlement hierarchy. The Policy setting out in part S2.2 that the broad distribution of development in the Local Plan Area will be shaped by the role and function of places, based on the hierarchy of settlements. It goes on at part S2.3 to set out that there is a presumption in favour of sustainable development within the SPB, which will be reviewed through preparation of development plan documents and/or neighbourhood plans.
- 4.5 Aligned with Policy S2, Draft Policy H1: Housing Strategy sets out the patterns for the Draft Plan's new homes distribution identifying that a minimum of 100 homes will be sought across the settlements in the hierarchy's Tier 4 and 5 settlements. Clearly therefore, the allocation of the Site and its incorporation within a new SPB for the Village can be undertaken in accordance with the spatial strategy of the Draft Plan. The Site's current context of being immediately adjacent although outside of the existing SPB should accordingly not be employed as a blanket basis for exclusion.

4.6 Turning to the site-specific assessment presented in the IIA, this is replicated below in Table 1 which includes additional summarised commentary of an equivalent assessment undertaken by Boyer on behalf of Cala.

**Table 1.** IIA Assessment of Land at Five Acres, Ropley Dean (Site Ref, ROP-010)

IIA Objective	IIA Scoring	Boyer Scoring	Commentary
IIA1: Biodiversity	0	0	Noted.
IIA2: Carbon Emission	0	0	Noted.
IIA3: Climate Change	0	0	Noted.
IIA4: Accessibility	--	--	
IIA5: Safety and Crime	-	+/-	The IIA uses three metrics in arriving at a combined <i>minor negative effects likely</i> scoring. Of specific note is the absence of the Site benefiting from existing publicly accessible open spaces within 800m. Whilst this is correct the IIA fails to account that on site accessible POS can be provided – and has been incorporated to be so within Cala’s vision for the Site. Taking this into account we would suggest the combined objective scoring should be improved to a <i>mixed minor effects likely</i> .
IIA6: Skills and Jobs	+	+	Noted.
IIA7: Heritage	?	0	It is noted the IIA includes a comment there are ‘ <i>Two Grade II Listed Buildings</i> ’ indirectly impacted by the site. From review of the Historic England web-based register the nearest two listed properties are Ropley Lodge (list entry: 1093941) and Little Barton (list entry: 1093937). Ropley Lodge is recorded to be listed for its special architectural or historic interest. The listing details relate specifically to the historic architectural built form rather than its historical associated use or setting. Little Barton is listed for the same summary reasoning. Ropley Lodge is located circa 300m distance (as the crow-flies) from the nearest part of the Site and Little Barton <i>circa</i> 380m distance with intervening existing residential development in place. Development on the Site is most unlikely to have any consequence to these

			heritage assets. A negligible scoring is well-placed.
IIA8: Housing	+	+	Noted.
IIA9: Landscape	-	+/-	The IIA assess the Site to have a <i>medium/low</i> capacity score to <i>conserve and enhance the character of the landscape and townscape</i> . When considering the Site's context the consequence of introducing an appropriate development to the landscape character and visual amenity will be limited to receptors within or immediately adjacent to the Site. A landscape led development would most likely result in limited/no long-term adverse landscape effects. Indeed, in the 2019 Regulation 19 Plan Document the Council rightly concluded and noted within the then draft allocation policy SA30: ' <i>The adjoining residential areas provide a suitable context for residential development...</i> '. In our opinion introducing a high quality, landscape led development on the Site would be more likely to result in either <i>negligible</i> or a <i>mixed minor effects likely</i> impact.
IIA10: Natural Resources	--	-	We have assumed the double negative scoring results from the assumed Agricultural Land Classification rating and its location within two Source Protection Zones. Should the Site be allocated through the new local plan we would expect either a site specific and or a combined site specific and strategic level plan-led water-neutrality mitigation could be delivered as part of the Site's allocation for development. On this basis a <i>minor negative effects</i> score might be more reasonable.
IIA11: Water Quality	-	-	Noted
IIA12: Pollution	--	0	A double-negative scoring has been given in the IIA on the apparent basis of the railway line and the A31 being within 150m of the Site. The A31 is situated <i>circa</i> 180m distance from the Site's nearest southern boundary – beyond the threshold criteria stated to be being employed by the IIA. The railway is located within the immediate proximity of the Site's northern boundary. It is

			<p>likely that new homes developed on the Site would need to include appropriate standard noise mitigation measures, i.e. property orientation, internal property layouts to limit main habitable rooms towards the northern site boundary, acoustically rated glazing, etc.</p> <p>Taking these comments into account, we would suggest an alternative appropriate scoring for the Site's development should be a negligible, if not otherwise a <i>minor negative effects likely</i>.</p>
--	--	--	---

Key to the High Level Assessment Matrix	
<b>++</b>	Significant positive effects likely
<b>+</b>	Minor positive effect likely
<b>+/-</b>	Mixed minor effects likely
<b>-</b>	Minor negative effects likely
<b>--</b>	Significant negative effect likely
<b>0</b>	Negligible effect likely
<b>?</b>	Likely effect uncertain

4.7 Having regard to the above, Cala would be glad to further discuss the Site and it's scoring performance within the evidence base supporting and informing the ongoing local plan review process, with a view to the Site being further considered as a residential allocation within the District's next adopted local plan.

## 5. CONCLUSION

- 5.1 Boyer has prepared these representations on behalf of Cala Homes (Thames) Ltd, in response to the 'Regulation 18' Consultation on the 'Draft Local Plan 2021-2040' (the 'Draft Local Plan'), undertaken from 22 January to 4 March and prepared by East Hampshire District Council ('EHDC').
- 5.2 These representations are made with respect to the ongoing promotion of the Land at Five Acres, Ropley Dean, for residential-led development, over which Cala holds a specific land interest.
- 5.3 Cala is promoting the Land at Five Acres, Ropley Dean for a residential-led development, to support the sustainable growth of the settlement. Cala's proposals for the site include for the delivery of:
- Approximately 38 homes across a range of dwelling types and tenures to assist in meeting local housing needs,
  - Delivery of much needed affordable housing,
  - New areas of public open spaces,
  - Biodiversity net gains,
  - Improvements to the local cycle and pedestrian routes, and
  - Delivery of new homes within the early years following the adoption of the District's next local plan.
- 5.4 The purpose of these representations is to assist the Council in formulating an approach within the Draft Local Plan that is both consistent with national planning policy and the tests of soundness. In this regard, our representations relate to the tests of soundness set out at paragraph 35 of the NPPF (December 2023); namely, whether the emerging Draft Plan is: *Positively prepared; Justified; Effective; and Consistent with national policy.*
- 2.49 Cala considers that, at this stage, the approach set out in the Draft Local Plan Consultation Document form an approach that is exposed to being found *unsound*. The approach fails to sufficiently address several overarching 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; the need to seriously consider increasing the housing target to ensure improved delivery of much needed affordable housing needs specifically; and failing to support the sustainable growth of the District's rural settlements, such as Ropley Dean.
- 5.5 The approach currently being presented in the Draft Plan, specifically in regard to the Housing Requirement, and the associated Spatial Strategy that flows from this, is in our view misplaced and at odds with national policy.

- 5.6 These representations have set out our recommendations to assist the Council in achieving an approach that is capable of being found *sound* as the emerging plan progresses toward examination.
- 5.7 Cala would welcome the opportunity to meet with the Council to discuss the opportunity that the Land at Five Acres provides to deliver much needed market and affordable housing to support the sustainable growth of the settlement of Ropley Dean.

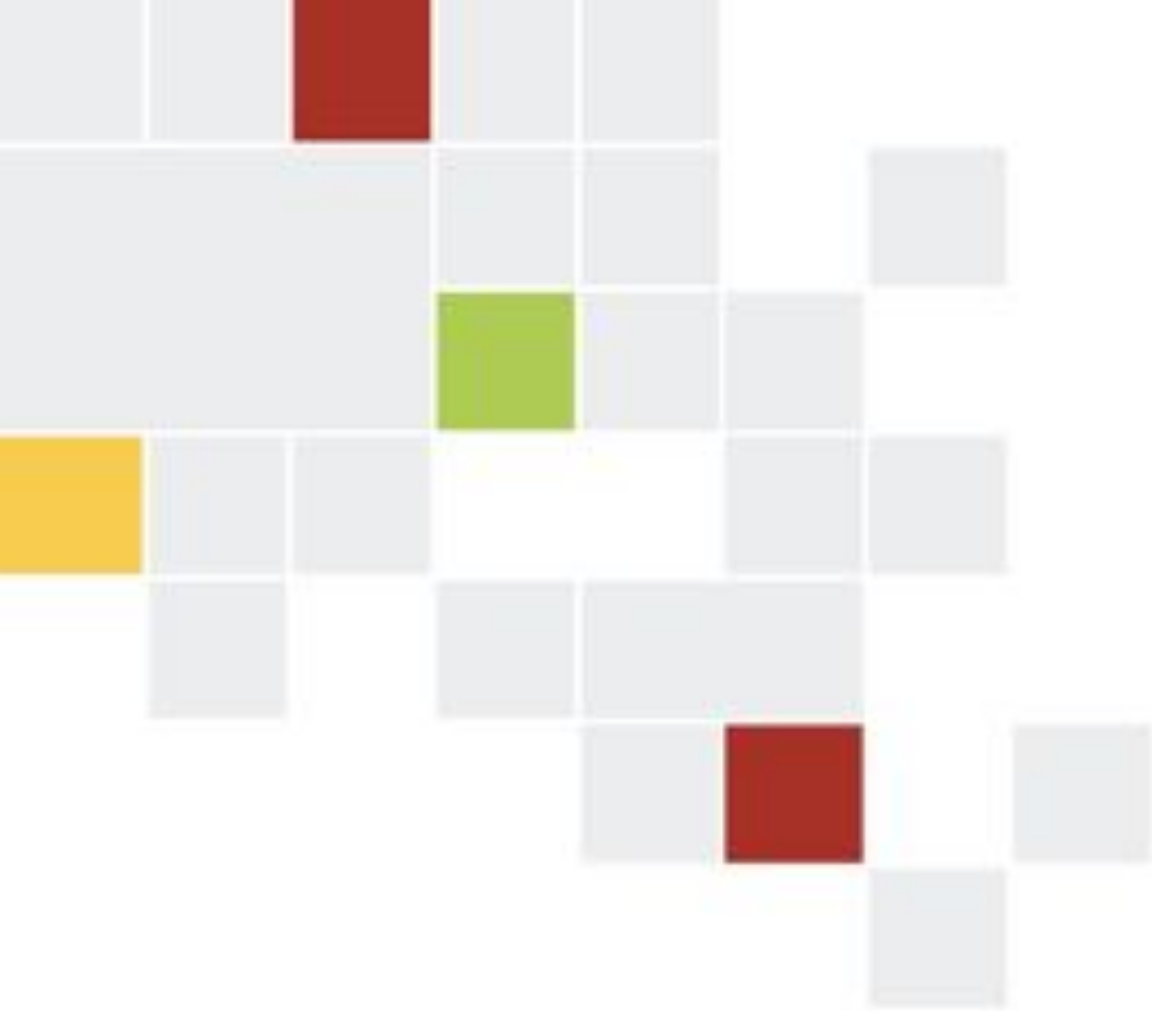
## APPENDIX 1. SITE LOCATION PLAN



Land at Five Acres



Land at Five Acres



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Planning Policy Team  
EHDC

Email: [REDACTED]

Our ref: BV/Bent

1 March 2024

Dear Sir or Madam

### **Regulation 18 – Response to the draft EHDC Local Plan 2021-2040**

We are instructed by our client, Forays Homes Ltd., to submit representations to the draft Plan that is out for consultation until 4 March 2024. As part of our representation, and to aid discussions, we enclose a redline indicative site layout plan that covers land (known as Bentley Garden Livery) that our client has an interest in located in Bentley off London Road.

Our client, Forays Homes, was founded by brothers [REDACTED]. Forays Homes started as a UK-based collaborative property developer and designer of unique luxury projects in exceptional locations. Today they continue to develop high-end modern homes with a focus on delivering distinctive, premium homes ensuring every aspect of the process is considered and carried out with uncompromising attention to detail and the utmost care.

Our client is a small family run business and has built its reputation on commitment to the communities they work in. The projects are located in some of the finest and most highly sought-after locations across the South East.

Furthermore, Forays Homes have built in Bentley previously, having developed Holmes Field Place in 2015. The site was well received by the local community and has been praised by the Parish Council, citing it *'is a positive example of how future development in Bentley can add housing and contribute to the local rural character'*.

We have reviewed the draft Plan and below we set out our detailed representations for consideration as part of this consultation process which will hopefully see a Plan for the District adopted to help guide development for years to come.

### **Chapter 2 – Vision and Objectives**

Firstly, we **welcome and support** the key vision placed in the draft Plan which is *'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.'*

The vision then goes on to list a number of objectives including 'A1-Provide a sustainable level of housing growth to meet future housing needs and to provide homes for all and A2 - maintain a flexible and varied supply of land and buildings for business that is the right type and in the right location, including the rural areas'. These elements form a key part of the overall vision that our client fully supports.

## **Chapter 9 – Homes for All and Chapter 12 – Site Allocations**

Chapter 9 deals with Housing provision and again **we support** the Council's approach of delivering sustainable new homes within all key settlements including Villages such as Bentley. Chapter 12 deals with site allocations and we note that Bentley is identified as a Tier 3 settlement just behind the principal larger towns and Villages of Alton, Liphook, Whitehill and Bordon where the majority of new homes are to be located. Figure 12.1 sets out the suggested housing distribution to each area and what is clear is that Bentley seems to have been allocated a very low number (just 20 units) compared to other tier 3 areas such as Clanfield, Four Marks etc. Firstly, we believe it is important to state within this Chapter that the number proposed are not maximum or a limit that cannot be breached but as a guide to development in these areas.

Secondly, we see no reason why Bentley could not deliver more homes across a range of sites than simply '*putting all its eggs in one basket*' at the site identified as land west of Hole Lane for 20 units. As set out above, our client has an interest in the land shown on the enclosed plans which is a previously developed equestrian facility with a piggery on site and a home. The enclosed proposed site layout plan shows how the site could be sensitively developed for circa. 5 new homes based around a landscape-led approach. Its redevelopment would ensure that a potential nuisance use close to existing residents is removed and much needed new homes are provided in this area along with new landscaping and biodiversity opportunities within the site. The site is well located to the existing Village centre and our initial assessments suggest there are no insurmountable technical issues (ie drainage, access, ecology, trees etc.) as to why the site could not be successfully developed as we have shown in the enclosed plan.

As cited by recent announcements by Michael Gove the government is keen to support small and medium sized companies (such as Forays Homes) who have a positive track record in the area having previously developed the Holmes Fields Place for 9 new homes in 2015. This support is now government policy as set out in the newly released NPPF at paragraph 70 where it states '*Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.*' Paragraph 85 also advises that '*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*'

We would suggest that any draft Policy and associated allocations look to increase the number of homes to be delivered at Bentley to take account of our client's site and to ensure a range of sites are chosen. By doing so, the risk of developing new homes is spread across several sites and so in the event that a single site is held up for whatever reason, then other sites can still deliver or look to pick up any shortfall.

Finally, we would like to reiterate our support (subject to the suggested changes above) for the draft EHDC Local Plan which has sought to balance the need for housing and community benefits alongside protecting the character and vitality of the District.

We look forward to discussing our suggested changes to the draft Plan as it progresses through the various stages to adoption. In the meantime, if there are any queries, please do not hesitate to contact me.

Yours sincerely





**From:** [REDACTED]  
**Sent:** 08 March 2024 18:34  
**To:** [EHDC - Local Plan](#)  
**Subject:** Carter Jonas obo [REDACTED] - East Hampshire Local Plan update - Reg. 18 consultation  
**Attachments:** [REDACTED] East Hants Reg 18 rep. March 2024.pdf

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**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Consultation Responses

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

Dear Planning Policy Team,

**East Hampshire Local Plan Update Regulation 18 consultation**

Please find attached herewith submissions to the above listed consultation on behalf of [REDACTED].

I would be grateful if you could confirm receipt of this email, and its attachment.

If you need any other information from me, please do contact me using the information below.

Thank you, and kind regards,

Peter

Classification L2 - Business Data

[REDACTED]  
Partner



[REDACTED] [carterjonas.co.uk](http://carterjonas.co.uk)

Mayfield House, 256 Banbury Road, Summertown, Oxford, OX2 7DE



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We invest in people



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**EAST HAMPSHIRE DISTRICT COUNCIL  
DRAFT LOCAL PLAN  
REGULATION 18 CONSULTATION**

**RESPONSE ON BEHALF  
OF**



**Carter Jonas**

**March 2024**



<b>CONTENTS</b>	<b>Page No</b>
1.0 INTRODUCTION.....	1
2.0 DUTY TO COOPERATE .....	2
3.0 VISION & OBJECTIVES.....	2
Vision .....	2
Objectives.....	3
4.0 MANAGING FUTURE DEVELOPMENT.....	3
Policy SP1 - Spatial strategy.....	3
Policy S2 - Settlement hierarchy.....	3
5.0 RESPONDING TO THE CLIMATE EMERGENCY .....	5
Policy CLIM1 - Tackling the Climate Emergency .....	5
Policy CLIM2 - Net-Zero Carbon Development: Operational Emissions.....	6
Policy CLIM3 - Net-Zero Carbon Development: Embodied Emissions .....	6
6.0 SAFEGUARDING OUR NATURAL AND BUILT ENVIRONMENT .....	6
Biodiversity and designated sites.....	6
Policy NBE3 - Biodiversity Net Gain .....	7
Policy NBE10 - Landscape .....	7
Policy NBE11 - Gaps between settlements.....	7
6.0 HOMES FOR ALL .....	8
Housing need .....	8
Policy H1 - Housing Strategy .....	10
7.0 CONCLUSION .....	10



## 1.0 INTRODUCTION

- 1.1 Carter Jonas is instructed by [REDACTED] to respond to the East Hampshire District Council's ("the Council") Draft Local Plan ("the Local Plan") Regulation 18 consultation.
- 1.2 [REDACTED] owns land at Medstead. The sites are identified in East Hampshire Land Availability Assessment (LAA) (November 2023) as follows:
- "Land west of Roe Downs Farm, Medstead [north]" site reference LAA/MED-023
  - "Land west of Roe Downs Road, Medstead [south]" site reference LAA/MED-024
- 1.3 The LAA confirms that both of the sites are 'suitable,' 'achievable' and 'available' for development. With a residential development capacity of around 87 dwellings at LAA/MED-023 and 96 dwellings at LAA/MED-024.
- 1.4 We agree that both sites are suitable for development in principle and that the capacity identified at LAA/MED-023 is reasonable. However, we have not been able to identify the specific reasons for capacity identified at LAA/MED-024. 96 dwellings appears to be an artificially low level for a site that is likely to have a capacity for **at least 500 new homes**.
- 1.5 Nonetheless, [REDACTED] confirms that the sites remain available for development. LAA/MED-023 is likely to be a longer-term site option, with LAA/MED-024 available for development now. Therefore both sites have significant potential to become development site allocations through the emerging Local Plan.
- 1.6 The consultation document and the supporting evidence has been reviewed, and [REDACTED] is pleased to be able to comment on a well-developed draft plan. The general direction of the Local Plan is noted, and some comments and concerns about the plan are raised hereunder, focusing on those themes which affect [REDACTED] and his interests the most. However, it is in everyone interest for the Councils to have a robust and sound plan, regardless of individual land interests at this time.

## 2.0 DUTY TO COOPERATE

2.1 [REDACTED] notes the commentary in the Local Plan, and in the associated Housing Needs paper, regarding the Duty to Cooperate.

2.2 It is noted that the Council continues its dialogue with the South Downs National Park, and through the Partnership for South Hampshire. Both these ongoing conversations have identified some level of unmet housing need.

2.3 The NPPF at paragraph 24, outlines that:

*“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”*

2.4 Most critically, at paragraph 26, the NPPF explains that:

*“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.”*

2.5 [REDACTED] accepts therefore, that the Council is doing what it can regarding the Duty to Cooperate, but clear conclusions will need to be drawn before the Plan is submitted for its examination. If there is unmet housing need “*across the sub-region of approximately 12,000 homes to 2036*”<sup>1</sup> then there is an opportunity in East Hampshire to do more to help meet this need. Locations like Medstead, and Four Marks, are very sustainable and can support further growth. Sites like Land west of Roe Downs Road, and Land west of Roe Downs Farm should be allocated to meet the needs of the local community and the wider subarea, or at least ‘safeguarded’ to help meet future needs.

## 3.0 VISION & OBJECTIVES

### Vision

3.1 [REDACTED] notes that the Council has developed a refreshed vision and objectives that set out the Council’s approach to sustainable development, and community needs, whilst also planning for carbon management, climate change and the natural environment.

3.2 The vision should explicitly recognise the need to meet locally assessed housing need. It should place a more substantial emphasis on the need to deliver affordable housing across the districts and to improve affordability of housing in the rural areas, particularly where there has been a locally identified need and a historic under-delivery of new homes.

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<sup>1</sup> Draft Local Plan 2021-2040 (Regulation 18) Housing Background Paper [download \(easthants.gov.uk\)](https://www.easthants.gov.uk)

## Objectives

- 3.3 The objectives proposed in the Local Plan appear to be appropriate.
- 3.4 The objectives to provide a sustainable level of housing and employment growth are supported, but what constitutes a sustainable level of growth is questioned. There is capacity and opportunity to deliver more homes, in a sustainable fashion in the District, including at Medstead and Four Marks.
- 3.5 The objectives aimed at carbon management, climate change resilience, and nature recovery a laudable, and supported. However, it is suggested – as with the policies later in these submissions – that the evidence which underpins them needs to be more robust, and that legislation, and or regulation may overtake the way that these matters as dealt with through the planning and development process.
- 3.6 The objectives which seek to support new infrastructure and technology are supported, and it is suggested that new development can help deliver the new infrastructure which is so desired.

## 4.0 MANAGING FUTURE DEVELOPMENT

- 4.1 [REDACTED] recognises the strengths of the proposed spatial strategy which seeks to focus development in the “most sustainable locations,” i.e., the largest settlements in the district. But there is a lack of support for the more rural communities in the districts.

### Policy SP1 - Spatial strategy

- 4.2 Draft Policy SP1 does not radically depart from the current spatial strategies of the extant Local Plan. Broadly the strategy seeks to protect designated areas from development, and focussing growth in those settlements at the higher levels of the ‘settlement hierarchy.’
- 4.3 [REDACTED] recognises that development at Alton, and at Horndean, Liphook, and Whitehill & Bordon will continue to be important to meeting the growth and development needs for the district. However, this must be balanced with meeting the needs – and especially the affordable housing needs – of other locations in the hierarchy, at Four Marks and in Medstead.
- 4.4 More sites – or at least a greater quantum of new homes – needs to be attributed to settlements across the settlement hierarchy. The proposed spatial strategy underplays the needs of the rural communities, fails to fully recognise the sustainable opportunities for development at locations such as Medstead.
- 4.5 Housing needs are considered in response to the “homes for all” part of the draft Local Plan.

### Policy S2 - Settlement hierarchy

- 4.6 Policy S2 – Settlement Hierarchy, categorises the settlements in the district in terms of their access to services and facilities. The more sustainable settlements with close links between housing, jobs and services are ranked as higher tiered settlements (1), and the settlements with less access to services and facilities are classified as being

lower tiered settlements in the hierarchy (4). Each tier of settlement has a different strategic role which is identified within the spatial strategy.

- 4.7 [REDACTED] supports the principle of a settlement hierarchy and finds the hierarchy as set out in the Draft Local Plan to be drafted from a reasonable basis. However, the potential operation of the hierarchy is a cause for some concern.
- 4.8 [REDACTED] notes that the settlement hierarchy broadly considers:
- The provision of employment, retail services, education facilities in the settlements.
  - The proximity to other settlements which may offer different or a wider variety services and facilities.
  - The availability and quality of public and active transport connections.

### ***Medstead***

- 4.9 Medstead is a sustainable location for additional residential development, it has a primary school, it has a pub, and it has several community and sports facilities.
- 4.10 The village it is accessible to a range of employment opportunities; in Medstead itself there are a limited number of employers, mostly in the service sectors (and of course working from home opportunities), but also Four Marks and Alton are close by (and could be reached by bicycle). Winchester, Basingstoke, and Farnborough are all within easy commuting distance of Medstead.
- 4.11 Medstead is close the A31, has easy access to the M3, and is also well served sustainable travel options in the form of bus services to Alton.
- 4.12 Therefore, there is some evidence to suggest that Medstead could be elevated in the settlement hierarchy. In any event, the sustainability of Medstead demonstrates that settlements currently in 'tier 4' are capable of supporting more residential development.

### ***The hierarchy in operation***

- 4.13 This ranking of "importance" is limited in its assessment. Attributing important services to more sustainable locations results in settlements that already have services being ranked most suitable for development. This precludes the opportunity for development proposals to bring forward an essential service or facility to a lower tier settlement that may benefit from this enhancement.
- 4.14 For example, if a settlement is in a lower tier because it 'only' has a village hall, then as a by-product it is restricted to limited development. If major, more substantial development proposals were allowed in settlements with limited services, these developments could deliver services which could enhance the underserved settlement.
- 4.15 Furthermore, by allowing a settlement to become self-sustaining with the introduction of its own services, then it reduces the need for private car travel to neighbouring settlements to access those services. Thus, this contributes to the over-arching aims of the Joint Local Plan, which is to reduce private car travel and support sustainable, environmentally pro-active development.

- 4.16 The restricting of development through placement in a lower tier does not accord with the aspirations of the NPPF to deliver sustainable development. The opportunity to sustain existing services and facilities and enhance existing settlements are both sustainable objectives which are not being met by this hierarchy.
- 4.17 Indeed, the existing services and facilities in lower tier settlements are not being supported with growth, and thus are at risk of not being retained in accordance with NPPF paragraph 88.
- 4.18 Therefore, the Council should reconsider how it proposes to operate the settlement hierarchy, and more new development should be 'attributed' to lower tiers of the hierarchy to allow for the delivery of new services and facilities, to support the local economy, and to meet the needs of the more rural parts of the community.

### **Settlement boundaries**

- 4.19 [REDACTED] opinion is that settlement boundaries are an arbitrary and blunt instrument, which do not have regard to the contribution that some open spaces within settlements make to the character and appearance of those settlements. In terms of impact on amenity and the local landscape it might be preferable to locate new homes in edge of village locations which technically, might sit outside the arbitrary boundaries. It is therefore suggested that the philosophy and operation of settlement boundaries is negative and not necessarily generally fit for purpose. [REDACTED] submits that the use, and operation, of settlement boundaries does comply with the Planning Practice Guidance as follows:

*"The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness."*

Paragraph: 009 Reference ID: 67-009-20190722

## **5.0 RESPONDING TO THE CLIMATE EMERGENCY**

- 5.1 It is clear that this chapter is a political priority for the Council, and it is right that matters of climate change and carbon management are highlighted and engaged with, where they can have an impact. However, [REDACTED] questions the appropriateness of a Local Plan as the vehicle to engage with climate change and carbon management, when what is most acutely needed is a comprehensive, and consistent approach to sustainable development, which is best led by building regulations.

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

- 5.2 Draft Policy CLIM1 is seeking to direct development proposals in minimising the carbon and energy impacts of their design and construction and be designed to improve resilience to the anticipated effects of climate change. [REDACTED] agrees that this is a vital approach to development management and must lead to more energy efficient homes (and other buildings) and pave the way to reducing carbon emissions.

However, this is a clear example of an occasion where Government is seeking to improve standards across the whole country through building regulations.

- 5.3 Building regulations will provide a consistent mechanism for the improvements sought through proposed Policy CLIM1 which will support the continued delivery of new homes.

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

- 5.4 Draft Policy CLIM2 broadly requires all new development to use no fossil fuel energy on site, meet set requirements on how much heating the building will need and generate the same amount of renewable energy (preferably on-plot) as they demand over the course of a year, demonstrated through an energy statement.
- 5.5 The introduction of additional local net zero commitments is introduced to 'bridge a policy gap' to address the delivery of net zero carbon.
- 5.6 [REDACTED] considers that the approach to achieving zero carbon set out in the draft Local Plan conflicts with the Written Ministerial Statement (WMS) titled 'Planning - Local Energy Efficiency Standards Update', published on 13th December 2023, which establishes that the 'Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations' The Statement further mentions that planning policies proposing to go beyond the current or planned building regulations should be rejected at examination if they are not supported by a well-reasoned and robustly costed rationale that ensures that development remains viable.
- 5.7 [REDACTED] urges the Council to review the draft policy in light of the WMS and ensure consistency with the proposed national standards.

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

- 5.8 [REDACTED] raises no objection with the principle of proposed Policy CLIM3, and the need to manage embodied carbons is recognised.
- 5.9 [REDACTED] welcomes the fact that there are no 'targets' introduced in the proposed policy, but it does question how the Council proposes to assess the feasibility of demolition or re-use of various buildings.

### **6.0 SAFEGUARDING OUR NATURAL AND BUILT ENVIRONMENT**

- 6.1 The natural and historic environments; their conservation and enhancement, are at the heart of the planning system. This conservation and enhancement should of course be balanced with the social and economic pillars of sustainability, so whilst this part of the Local Plan is vitally important it must not overbear on the delivery of development.

#### **Biodiversity and designated sites**

- 6.2 [REDACTED] notes the proposed policies for Biodiversity, Geodiversity and Nature Conservation, and particularly for sites/areas designated for their biodiversity value.
- 6.3 [REDACTED] has no specific comments to make about the proposed policy approaches here, expect to remind the Councils that the hierarchy of designations should be



properly reflected in the final policies, as should the hierarchy of avoid, mitigate, and compensate.

### **Policy NBE3 - Biodiversity Net Gain**

- 6.4 [REDACTED] welcomes the Council's decision to adopt the minimum 10% Biodiversity Net Gain (BNG) requirement set out in the Environment Act 2021 (as brought into force on 12 February 2024), and not to seek to set a minimum target above this level.
- 6.5 This is not to say that 10% cannot be exceeded, but the Council is right to be pragmatic and not stifle development opportunities with additional arbitrary targets.

### **Policy NBE10 - Landscape**

- 6.6 The NPPF at paragraph 180 recognises "*the intrinsic character and beauty of the countryside*" and it assumed that this is the basis for proposed Policy NH5 (especially because 'valued landscapes' are considered in the subsequent proposed policy).
- 6.7 The matters described in the proposed policy, of character and setting, are covered in other proposed policies in the Joint Local Plan (most notably proposed Policies DES1-DES3). Therefore, [REDACTED] questions the need for the policy.
- 6.8 However, should the proposed policy be retained, it should outline that 'harm' and the scale of potential 'harm' to the landscape will need to be assessed and determined, in terms, by the applicant and the deciding authority. There also ought to be an 'internal balancing' exercise included in the policy which requires the assessment of the identified level of harm against any proposed public benefits of a proposal.
- 6.9 [REDACTED] also acknowledges that the NPPF, at paragraph 180, supports:

*"a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);"*

- 6.10 Proposed Policy NBE10 is seeking to use this section of the NPPF to manage development in locally valued landscapes. These landscapes are identified in various East Hampshire studies (some of which are due to be updated), and in Figure 5.3 of the draft Local Plan.
- 6.11 [REDACTED] notes that the wording of the proposed policy mentions "special characteristics" and "significance" of these potentially valued landscapes. However, the NPPF text quoted above refers only to "identified quality," therefore, it is suggested that the policy wording is reviewed to ensure that it remains consistent with national policy. Moreover, it is also suggested that the protection and enhancement required in the policy is clear that it is commensurate with the identified quality as required by the NPPF, and not overly draconian or burdensome.

### **Policy NBE11 - Gaps between settlements**

- 6.12 [REDACTED] understands the principle of Strategic Gaps and acknowledges the role that they can play in preventing the coalescence of settlements. However, these Gaps (alongside the proposed Local Green Spaces), risk becoming too much of a restriction to development.

- 6.13 Regarding this concern about the scale of the Gaps, and the Local Green Spaces referred to in Policy DM1, ██████████ would like to highlight part of the PPG (under the heading 'Local Green Space designation'), which warns against trying to create a 'Green Belt' through "the back door". ██████████ suggests that the Council should keep in mind the PPG which is as follows:

*"There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name."*

(Paragraph: 015 Reference ID: 37-015-20140306)

- 6.14 Bringing forward Land west of Roe Downs Road (and Land west of Roe Downs Farm) for residential development would not result in the coalescence of settlements, and subject to careful masterplanning and landscape mitigation, would not compromise the perception of the gap between the settlements of Four Marks, and Medstead.
- 6.15 When the Land west of Roe Downs Road is brought forward for development, it will deliver significant landscaping benefits. These benefits could include accessible green space, which could be delivered alongside development, plus improvements such as better accessibility to the surrounding landscape, longer-range foot and cycle paths, biodiversity, landscape and environmental enhancements, and improved management opportunities.

## 7.0 HOMES FOR ALL

- 7.1 It is important that local authorities act decisively and plan proactively to ensure that the Housing Market Area (HMA) realises its potential for future growth and the allocation of land for development in East Hampshire reflects the objectively assessed housing need of wider South Hampshire sub-region. This includes the emerging unmet needs of neighbouring authority areas, which must not be ignored.

### Housing need

- 7.2 ██████████ welcomes the Council's acceptance that the housing requirement in the Local Plan must start with the Standard Methodology. However, ██████████ also highlights that the NPPF sets out, at paragraph 61 (with our emphasis), that:

*"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area..."*

- 7.3 It is agreed then that the minimum starting point for the number of homes needed in East Hampshire is likely to be around 9,082 new homes across the plan period, or around 478 per year. It is also noted that the housing number derived from the



Standard Methodology should be kept under review and, as such, ██████████ may well comment on this figure again at the next stage of Local Plan consultation.

- 7.4 After establishing the minimum starting point for the housing need in the housing market area (which Catesby notes is defined in the housing market assessment as the Borough area), the Council should next consider whether there are grounds for 'uplifts' to meet specific housing needs.
- 7.5 In the Housing and Employment Development Needs Assessment, at Table 7.10, and at Table 7.15, the gross and net annual need for affordable housing in the district is identified respectively. The analysed evidence in the report includes a range of housing challenges, constraints and needs depending upon certain affordability assumptions.
- 7.6 The output is that affordable housing needs could be as high as 911 dwellings per annum (dpa), gross, and 297 dpa net. If the annualised figures are considered, and are considered as 40% of the overall delivery of housing in a given year (which would reflect the proposed policy for Affordable Housing in the Draft Local Plan), it reveals the following:
- 742.5 dwellings per year are required to provide 297 affordable homes.
  - 2,277.5 dwellings per year are required to provide 911 affordable homes.
- 7.7 Therefore, the proposed annual housing requirement of circa 478 dwellings per year, which would only provide 191 affordable homes will not meet the lowest end of the predicted need. It should also be remembered that the actual delivery of affordable homes will be much less than the 40% suggested in policy, because many permitted sites will be exempt from delivering affordable houses, either because the sites are too small, are redevelopment sites with "vacant building credit," or because some sites simply cannot be viably delivered with the expected level of affordable homes.
- 7.8 Simply by considering the identified level of affordable housing need in the district, and contemplating how it might be delivered, suggests that there is a strong case to uplift the minimum starting point for housing need (as derived from the Standard Methodology). The housing requirement in the Local Plan Update should be set at a higher level to go further in meeting the affordable housing needs across the Borough.
- 7.9 The housing requirement should be increased, and further development site allocations should be made, including at Medstead, and Four Marks or at least a higher quantum of development expected across all settlements in the hierarchy should be included in the Draft Local Plan.
- 7.10 There is limited discussion about any potential 'economic strategy' for the District in Housing and Employment Development Needs Assessment, or in the Draft Local Plan. It is therefore difficult to ascertain whether any uplift in housing numbers might be required to support economic growth. ██████████ suggests that the Council should set out its case for economic growth more clearly in the publication version of the Local Plan Update, and also justify why the housing requirement has (or had not) been uplifted in the light of that strategy.

### ***Unmet housing needs***

- 7.11 Throughout the Draft Local Plan it is acknowledged that no assumptions are made on the unmet needs of other neighbouring local planning authorities (with the exception of the SDNPA). However, it is suggested that any dwellings surplus to the identified requirements could be attributed to any future identified unmet need.
- 7.12 [REDACTED] is of the opinion that this approach is not effective, or positive. East Hampshire should work more closely and collaboratively with its neighbours to establish the level of local unmet housing needs. The Councils should allocate development sites in response to the collaborative work – or at least identify ‘safeguarded’ sites – to aid in meeting these unmet needs.
- 7.13 Sites such as Land west of Roe Downs Road, and Land west of Roe Downs Farm, could make a valuable contribution to meeting the housing needs of East Hampshire, and/or its neighbouring authorities.

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

- 7.14 [REDACTED] notes the housing strategy proposed in draft policy H1, and that it reflects the spatial strategy of draft policy SP1. However, [REDACTED] suggests that there is a much greater capacity, and need for new homes, across the settlement hierarchy as set out in detail through these submissions.

### **8.0 CONCLUSION**

- 8.1 [REDACTED] is pleased to have had the opportunity to comment on the emerging Local Plan and is heartened to see such an advanced draft. There are some matters of detail, touched upon in these submissions that will need the Council’s attention before the next stage of consultation, and critically, [REDACTED] requests that more development is identified across the settlement hierarchy, in locations like Medstead, and Four Marks. The best approach would be more sites allocated, in the Local Plan.
- 8.2 “Land west of Roe Downs Farm, Medstead [north]” site reference LAA/MED-023 is ‘suitable,’ ‘achievable’ and ‘available’ for development with a residential development capacity of around 87 dwellings. This is likely to be a longer term option, from around the middle of the plan period.
- 8.3 “Land west of Roe Downs Road, Medstead [south]” site reference LAA/MED-024 is ‘suitable,’ ‘achievable’ and ‘available’ for development, now, with a residential development capacity of potentially 500-600 new dwellings, not the 96 dwellings, suggested in the LAA.
- 8.4 [REDACTED] confirms that the sites remain available for development. Therefore, both sites have significant potential to become a development site allocation through the emerging Local Plan.
- 8.5 Further development at Medstead and Four Marks would help support existing services and facilities and improve the availability of affordable housing. The sites are all well related to existing settlements and would constitute sustainable development in accordance with the NPPF
- 8.6 Overall, in planning to meet the future objectively assessed housing development needs of East Hampshire to 2040, the Council should recognise the merits of the

potential for additional sustainable, residential-led development across the district, across the proposed settlement hierarchy.

## East Hampshire District Council Local Plan

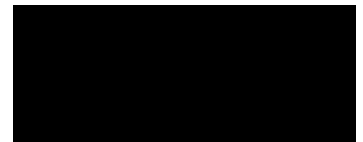
Draft Local Plan 2021-2040 (Regulation 18)

**Relating to**

Land at Lowsely House  
131 to 133 Headley Road  
Liphook  
GU30 7PU



Castle Properties Ltd



March 2024

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## 1 INTRODUCTION

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1.1 This report provides details of a site presented for consideration as a non-strategic housing allocation as part of the East Hampshire District Council Local Plan (EHDC) review.

This representation is framed in the context of the tests of soundness as set out in Paragraph 35 of the National Planning Policy Framework (NPPF), which states that for a Plan to be sound, it must be:

- **Positively Prepared** – the plan should provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs;
- **Justified** – the plan should be the most appropriate strategy;
- **Effective** – the plan should be deliverable and based on joint working; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

This representation seeks to provide further information to the Council regarding the deliverability of the site, and to demonstrate that the site is available, can be delivered, and that development is achievable within five years of the plan’s future adoption.

1.2 The site is being promoted by Castle Properties Ltd on behalf of the landowner and is developable, deliverable and achievable within a 5-year period.

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## 2 LOWSLEY HOUSE

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### The Site and Location

- 2.1 The site is 4.01 hectares in size and is located on the northern edge Liphook. Its eastern boundary adjoins residential property in Dryden Way whilst the southern boundary adjoins a small area of pasture land and the A3. The site is accessed via Headley Road (B3004).

**Figure 2.1 – Site Location**



- 2.2 The site comprises Lowsley House's house and gardens, with mature hedgerows and trees on all boundaries. The land is relatively flat but rises slightly from east to west. The site sits at an elevated position relative to the A3. Housing to the south and east is predominantly detached houses, with those along Headley Road having larger plot sizes.



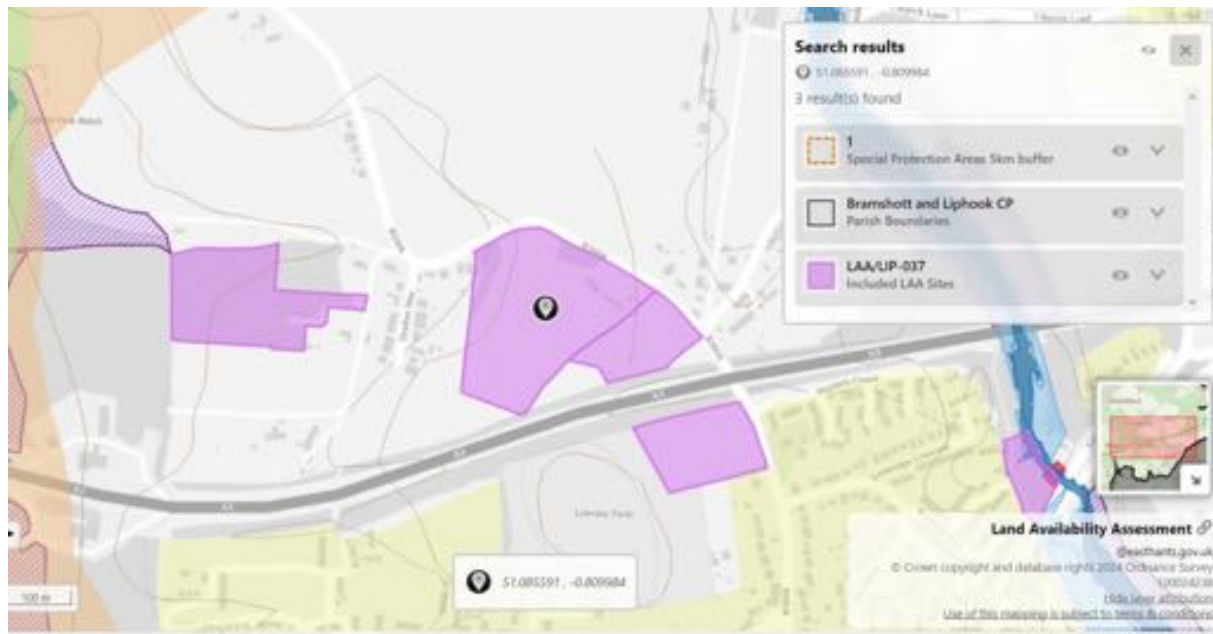
### 3 LAND AVAILABILITY ASSESSMENT (LAA) NOVEMBER 2023

3.1 The site was submitted to EHDC in the 'Call for Sites' in September 2018 and is included in the Land Availability Assessment (LAA) November 2023

LAA/LIP-037 Lowsley House, 131 to 133 Headley Road, Liphook, GU30 7PU

East Hampshire Land Availability Assessment 2023

Site Reference	Site Address	Area (ha)	0 - 5 Yrs	6 -10 Yrs	11-15 Yrs	Total Capacity	Notes
LAA/LIP-014	Land at Penalty Farm, Liphook	14.72	0	65	0	65	
LAA/LIP-017	Chilley Farm, Liphook	4.46	0	67	0	67	
LAA/LIP-018	Land rear of 9-11 London Road, Liphook	0.31	6	0	0	6	
LAA/LIP-019	Land at Old Shepherds Farm, Liphook	7.08	85	0	0	85	Part of LAA/LIP-041
LAA/LIP-020	Land at Devils Lane, Liphook	9.29	92	0	0	92	Part of LAA/LIP-041
LAA/LIP-021	Land north of Highfield Lane, Liphook	2.39	27	0	0	27	Part of LAA/LIP-041
LAA/LIP-022	Ajax & Plowden House ,Haslemere Road, Liphook, GU30 7AL	0.44	12	0	0	12	
LAA/LIP-023	Land east of Devils Lane, Liphook	6.22	0	40	0	40	Part of LAA/LIP-041
LAA/LIP-037	Lowsley House, 131 to 133 Headley Road, Liphook, GU30 7PU	4.29	28	0	0	28	
LAA/LIP-038	Land north of Liphook	1.2	10	0	0	10	
LAA/LIP-041	Bramshott and Liphook	43.21	0	485	0	485	
LAA/LIP-043	Land at 38-40 Station Road	0.28	33	0	0	33	
LAA/LIP-045	Land Southwest of, 71 London Road, Liphook	0.57	10	0	0	10	



- 3.2 The LAA assesses the site against three broad criteria.
- 3.3 **Suitability** - a site or broad location can be considered suitable if it provides an appropriate location for development when considered against the relevant constraints and their potential to be mitigated.
- 3.4 **Availability** - A site can be considered available for development when, on the best information available to the local planning authority, there is confidence that there are no legal or ownership impediments to development.
- 3.5 **Achievability** -The PPG confirms that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. In effect, this is a judgement about the economic viability of a site and the capacity of the developer to complete, and then let or sell the development over the plan period.
- 3.6 **Deliverability and Developability** -The conclusions on the suitability, availability and achievability of sites and broad locations have been used to inform a judgement as to whether a site can be considered 'deliverable' or 'developable' over the plan period
- 3.7 EHDC has concluded that the site meets all the above criteria and is 'deliverable and developable'.



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## **4 PLANNING**

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### **Spatial & Housing Strategy**

#### **Policies S1 – Spatial Strategy**

Policy S1 of the draft Local Plan outlines the Spatial Strategy for East Hants District, specifying that over the plan period 2021 – 2040, the Local Plan will make provision for the delivery of at least 9,082 new homes, equivalent to 478 homes per annum. The standard methodology for estimating housing need in the District has been used, with a disaggregated approach between the two Local Planning Authority areas, comprising East Hants District and the South Downs National Park.

A Technical Note published by Icenl in September 2023 provides an update on the testing of the Standard Method Housing Need for East Hampshire using the 2021 Census data. This outlines strong demographic trends across the East Hants District in terms of population increase, which are higher than those in the South Downs National Park area within the East Hampshire. The Technical Note concludes that “if anything the data would point to a need higher rather than lower than the Standard Method”, and recommends that the Council consider new projections published by the ONS, expected in 2024.

The evidence provided in the Technical Note shows a strong recent increase in demographic trends in the District and a further potential population rise which is predicted to increase the need for housing in East Hants. It is therefore recommended that the Council should consider providing for a higher delivery of homes across the plan period based on a higher figure than the standard methodology. This will provide the Council with security that if the population considerably increases like it has done previously, that sufficient housing provision can be provided throughout the plan period, ensuring that the plan-led national planning policy approach can be followed.

#### **Policy H1 – Housing Strategy**

Policy H1 sets out a provision for 3,500 new homes in the most sustainable and accessible location in accordance with the Settlement Hierarchy in policy S2. This sets out 700+ dwellings in Tier 1 settlement of Alton, 1,100 dwellings in the Tier 2 settlements of Liphook, Whitehill & Bordon and Horndean, 600 dwellings in the Tier 3 settlements of Bentley, Clanfield, Four Marks,

Grayshott, Headley, Holt Pound and Rowlands Castle and 100 dwellings in Tier 4 and 5 settlements.

The dramatic reduction from the housing need figure of 9,082 new homes for the District to 3,500 new homes for the remaining plan period 2024 – 2040, is on the basis that the Council calculate that they have already delivered 6,225 new homes during the two years, 2021-2023, which is within the early part of the plan. The 3,500 new homes target would result in only 219 homes per annum being built in the District per annum in comparison to the 478 homes per annum set out in policy S1. This figure of 219 homes per annum appears to be very low for the remaining 16 year plan period given the potential high increase in population in the East Hants District identified in the Icen Background Paper.

The 6,225 homes that the Council consider have already been delivered comprises a breakdown of the 940 completions, 3,965 commitments, 1,320 windfall homes. The Council Housing Background Paper (January 2024) and the East Hants Five-Year Housing Land Supply Position (October 2023) provides further information on this. A large proportion of the 3,965 homes comprise existing commitments with a further 1,320 estimated for windfall. These are based on predictions of housing that will come forward based on those sites already granted planning permission and those estimates to come forward under windfall. There is no certainty that those planning permissions that have been granted will be fully implemented, especially given the uncertainty in the current financial climate. Equally the windfall allowance is only based on a prediction, rather than certainty of what numbers will definitely come forward. It should also be noted that whilst the Council currently state they have a sufficient housing land supply, this has not been tested and there is in our view a shortfall against their current requirements. This does not appear to be factored into the housing requirements.

There are concerns that a reliance on an uncertain and unevidenced existing supply of 6,225 homes during the two years (2021-2023), covering the start of the plan period, coupled with a potential spike in population increase within East Hants as indicated in the background evidence, will result in an undersupply of housing in relation to the level of housing need required within the District. The front loading of housing in the very early part of the plan period, without detailed evidence that these housing commitments can be delivered, could lead to an under delivery in the later part of the plan period. With a greater emphasis on housing land supply in the revised NPPF (paragraph 76).

It is therefore recommended that the Council re-consider their housing need based on the more up to date ONS data expected in 2024, and review their existing housing supply in terms of evidence, and certainty that they result in housing completions.

### **Sustainability**

The site is in a highly sustainable location for residential development, close to a range of existing services and facilities in Liphook. This accords with the Council's overarching spatial strategy to allow existing settlements to grow sustainably.

The site is within walking and cycling distance of local services and facilities on Headley Road.

There is potential to connect the site to the network of paths within the adjoining SANG to encourage healthy and active lifestyles.

### **Heritage Assets**

There are two conservation areas, one associated with the historic core of Liphook and another related to the River Wey. Neither area would be affected by the development of the site.

There are no listed buildings (Grade I and II\* Listed Buildings and Grade I and II\* registered parks or heritage assets) or Ancient Scheduled Monuments near the site, and there are no designated constraints to development.

### **Landscape**

The site is well-contained in the broader landscape and could be connected to existing facilities and services in Liphook. With good design, there will be no potential for adverse landscape and visual impacts.

### **Flood risk**

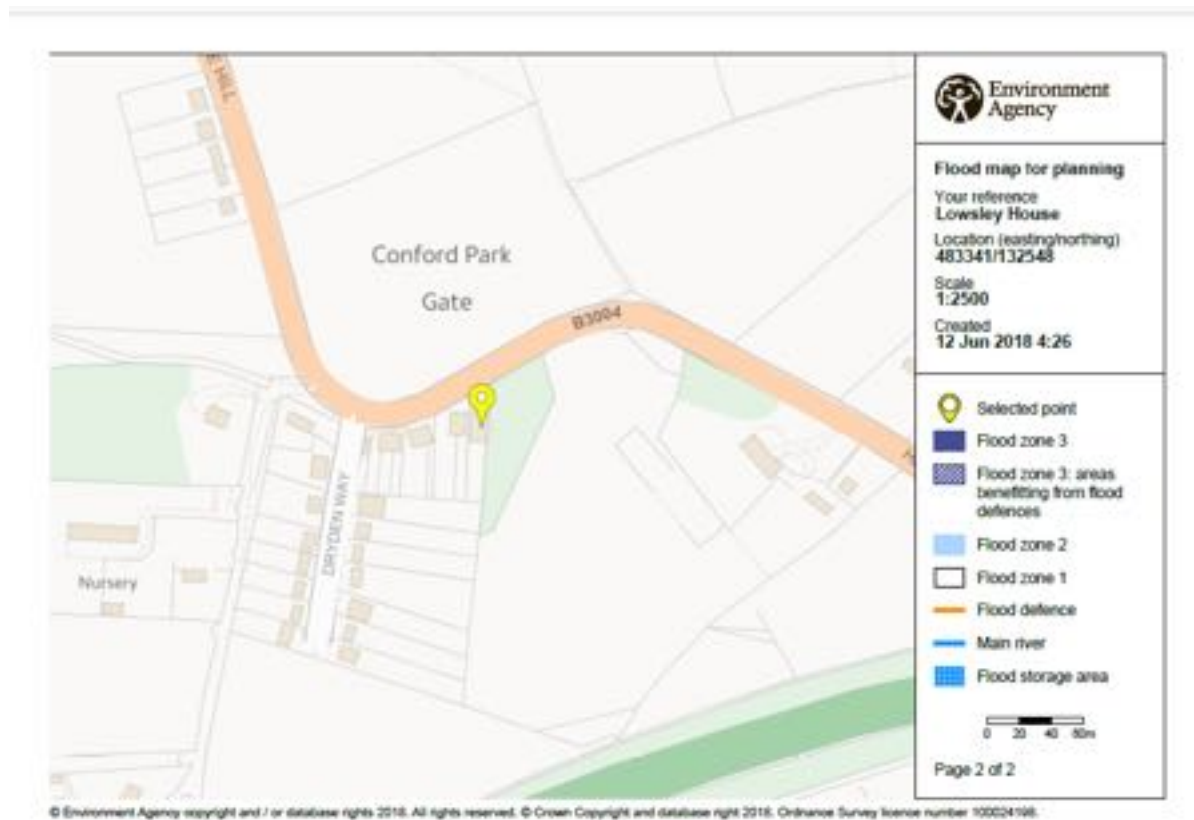
Sites known to be wholly or partially affected by or at particular risk from other sources of flooding other than fluvial, such as groundwater or surface water flooding, may be considered unsuitable for certain types of development. Such sites would be subject to a Flood Risk

Assessment, which will need to demonstrate that any proposed development will be safe over its lifetime, does not increase flooding elsewhere, and will reduce flood risk overall.

There are areas of fluvial flood risks relating to the River Wey and its tributaries.

The site is located in flood zone 1, an area with a low probability of flooding. See the attached plan provided by the Environment Agency.

There are no identified flood risks for this site.



**Other Constraints on Liphook**

- South Downs National Park
- Wealden Heaths Phase II
- Local Nature Reserves (LNRs),
- Sites of Importance Nature Conservation (SINC)

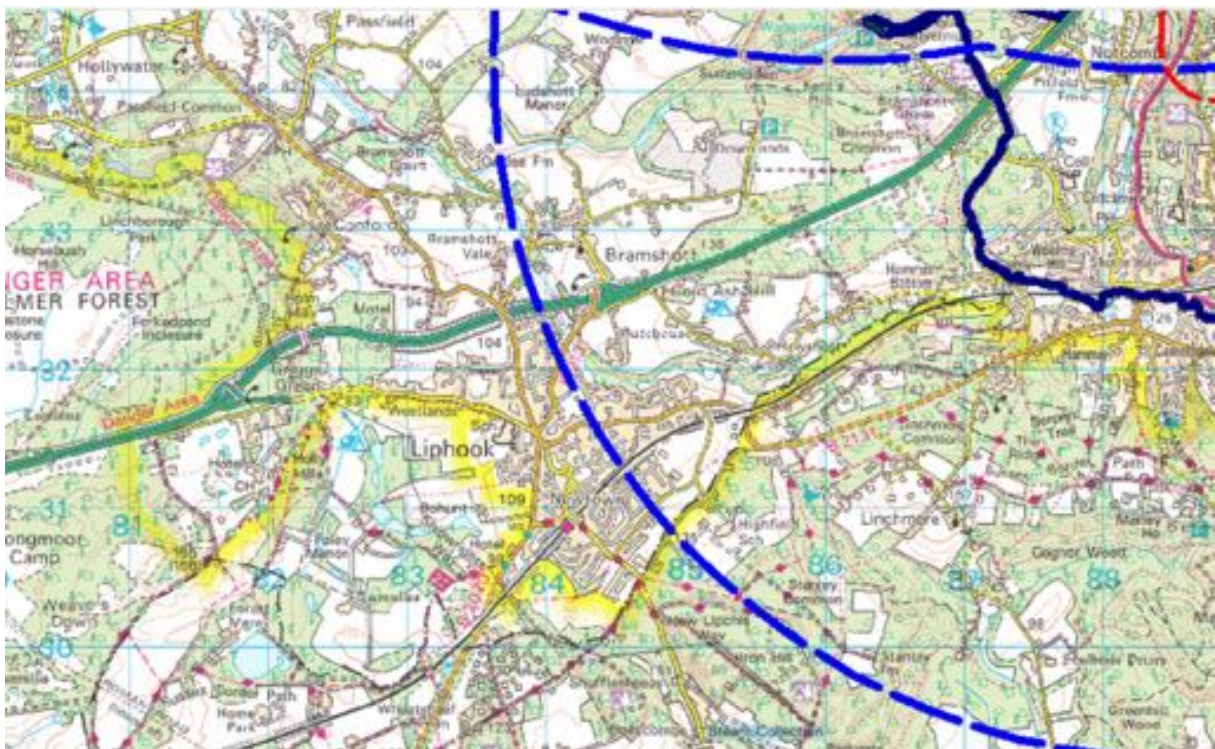
The southern and western parts of Liphook's settlement adjoin South Downs National Park, which is an independent local planning authority.

The site is located north of Liphook and would not adversely affect the South Downs National Park.

### **Wealden Heaths Phase II SPA**

The site is outside the 5Km buffer zone of the Wealden Heaths buffer zone

Any potential impacts due to recreational disturbance could be mitigated without the on-site provision of suitable alternative natural greenspace



### **Green infrastructure**

Mature vegetation on the site boundaries contributes to the site's visual containment within the landscape.

The trees on site are not protected by individual or group Tree Preservation Orders (TPOs). Most of the trees are on the boundaries and could be retained subject to a detailed tree survey.

### **Agricultural land quality**

The site does not contain Grade 3 agricultural land areas, a finite resource.

### **On-site drainage/Infrastructure**

The site has been identified as highly compatible with infiltration sustainable drainage systems. There are no cables or pylons, electricity lines, or oil pipelines on the land

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## 5 PROPOSAL

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### Proposals

- 5.1 The gross site area is 4.29 hectares (10.60 acres). The capacity of the site is between 60 and 90 houses and is suitable for older people housing, market housing and affordable housing
- 5.2 The proposal could deliver green and open space and significant Biodiversity Net
- 5.3 The site could be designed with a loose/informal layout in response to its setting and this opens up the possibility of introducing different character areas of high design quality.
- 5.4 The site could deliver policy-compliant affordable housing of a required tenure mix to meet local needs.
- 5.4 Castle intends to work closely with the landowners to deliver a 'legacy site' using high-quality design and a significant increase in Biodiversity Net Gain on site.

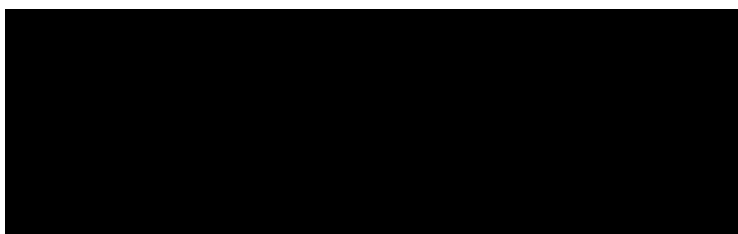
**From:** [REDACTED]  
**Sent:** 08 March 2024 14:56  
**To:** [EHDC - Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Central South Planning obo Grainger Plc - EHDC Local Plan Regulation 18 Consultation - Land at Woodcroft Farm representations  
**Attachments:** [638965 Regulation 18 March 2024 Land at Woodcroft Farm Phase 3 .pdf](#)

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

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

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Please find enclosed representations on behalf of Grainger Plc to East Hampshire District Council's Local Plan Regulation 18 consultation. These representations are in relation to the Land at Woodcroft Farm (site HD-024 within the EHDC IIA).  
Please would you confirm receipt of this email.  
Kind regards,



Website : [www.savills.co.uk](http://www.savills.co.uk)





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# East Hampshire Local Plan 2021-2040

## Regulation 18

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Land at Woodcroft Farm Phase 3





## Contents

1.	Introduction	1
2.	Site context	3
3.	Overview of Concept	6
4.	Response to Evidence Base Supporting The Regulation 18 Consultation	11
5.	Representations on the Draft East Hampshire Local Plan	14
6.	Conclusion	17

## 1. Introduction

- 1.1. This document, prepared by Savills Plc, provides representation on behalf of Grainger Plc to East Hampshire District Council (EHDC) on the Regulation 18 Our Local Plan 2021-2040 consultation. The Local Plan is at Regulation 18 public consultation stage and is due for adoption in 2025. The Regulation 18 consultation sets out the Council's direction of travel for the spatial strategy in terms of where development should be focused during the plan period. In addition to draft site allocations the Regulation 18 document sets out draft development management policies for the East Hampshire District (excluding those areas in the District that fall within the South Downs National Park).
- 1.2. Grainger Plc acknowledges that this Regulation 18 consultation is not exclusive from those undertaken in 2019 and 2023, and that EHDC has considered previous comments and representations in its preparation. This introduction provides a short record of Grainger Plc's submissions in relation to Land at Woodcroft Farm and details of previous engagement with stakeholders. The remainder of these representations are structured as follows:
- The second chapter provides details of the site and its surroundings.
  - The third chapter provides details of the indicative proposal and masterplanning work that has been undertaken on the site.
  - The fourth chapter responds to the background evidence base supporting this Regulation 18 consultation.
  - The fifth chapter responds directly to the Regulation 18 consultation document.

### Previous Promotion and Engagement with Stakeholders

- 1.3. Grainger Plc has been actively promoting Phase 3 of Land at Woodcroft Farm ('the site') as a sustainable extension to the consented, and largely built-out, Catherington Park development since 2014 through engagement with the Local Plan process. In this time, Grainger Plc has received positive responses from the Local Planning Authority (LPA) and Horndean Parish Council (HPC) on its potential for allocation within the emerging Local Plan. This has led to the site successfully in gaining a draft allocation in two versions of East Hampshire District Council's (EHDC) emerging new Local Plan (Regulation 18 stage, site ref SA37) for circa 180 dwellings.
- 1.4. Grainger Plc made representations to the EHDC Draft Local Plan 2017-2036 Regulation 18 consultation (March 2019) (in which the site received a draft allocation), and also attended a meeting with the Parish Council in August 2021 to discuss the details of how the site may be developed.
- 1.5. EHDC undertook a revised Regulation 18 (Issues and Priorities) consultation in 2023 following a number of changes to national and local planning policy since 2019. Grainger Plc subsequently responded to this consultation outlining the rationale for the site's allocation in the forthcoming Local Plan.

- 1.6. In 2023, Grainger Plc undertook further engagement with local stakeholders, residents and politicians pursuant to its desire to develop the site for up to 200 dwellings, alongside open space and enhanced access to the surrounding countryside. On 5 December 2023, a public exhibition was held between 2pm-7pm at the Acorn Community Centre, in addition to a dedicated website for the development being produced. The purpose of the public exhibition was for Grainger Plc and its project team to consult with members of the public in person and gain their views. Additionally, on 11 December 2023, Grainger Plc attended a meeting of Horndean Parish Council which was attended by local councillors and members of the public. Responses provided via these forums were carefully considered and have informed a number of changes to the illustrative masterplan, which details how a future scheme could come forward on the site.
- 1.7. Following the Council's decision to restart the Regulation 18 consultation process (following the site being assessed favourably for housing development a number of times in previous Regulation 18 consultations) , and the Council's publication of the 'Housing Outside of Settlement Boundaries' SPD, Grainger Plc have decided to bring forward the site for development in advance of the emerging Local Plan. In late 2023, a pre-application enquiry was submitted to EHDC for the development of the site for up to 200 dwellings and associated public open space and infrastructure (all matters reserved except access). An associated pre-application enquiry was submitted to Hampshire County Council Highways.
- 1.8. Grainger Plc wishes to set out in the strongest possible terms its support for EHDC in allocating the site for residential development. Grainger Plc considers Land at Woodcroft Farm Phase 3 can provide a sustainably located, high-quality development that can assist EHDC in planning positively for the future housing needs of the District without harm to any environmental.



## 2. Site context

- 2.1. Land at Woodcroft Farm Phase 3 measures approximately 8.2 hectares (ha) and lies to the north of the Wecock Estate and to the west of James Copse Road.

**Figure 1: Site Location**



- 2.2. The site is located to the very south of East Hampshire District and directly adjacent to the administrative area of Havant Borough. The site abuts the existing developed area of Catherington Park, comprising 288 dwellings.
- 2.3. The site predominantly comprises grazing paddock with a gentle southerly gradient. A cluster of trees is situated to the centre of the site, along with a belt of vegetation running from north-south which serves to visually delineate the site into two separate paddocks. The boundaries of the site are characterised by mature vegetation and trees which serve to ensure that the site is visually self-contained within the surrounding landscape.

- 2.4. The site is bounded to the west by grazing paddocks and to the north by a Byway Open to All Traffic (BOAT), beyond which lies James's Copse, an area of ancient woodland. Existing residential development is located to the east of the site.
- 2.5. The land is suitable for housing as demonstrated by the previous draft allocation (Site SA37) and is deliverable and viable for development, in accordance with the aims of the National Planning Policy Framework (NPPF). The site can be considered to be available in the earliest stages of the new Local Plan period.
- 2.6. The site is relatively unconstrained in terms of designations as it is not in a Conservation Area, is not adjacent to any listed buildings, nor does it contain any SINC or SSSI land within the development boundary. There are no specific landscape designations on the site and the entirety of the site is situated within Flood Zone 1. However, it is notable that the mature treeline to the northern boundary of the site is subject to a group tree preservation order (ref. EH1122(10)), in addition to two mature oaks situated to the centre of the site (ref. EH1122 (10)).
- 2.7. The site is sustainably located relative to the Catherington Park development situated immediately to the south and the settlement of Horndean which is located immediately east of the site. An analysis of the site's location relative to local amenities demonstrates that a number of convenience retail and education facilities located within 800m of the site.
- 2.8. The approved site layout for the Catherington Park development is shown at Figure 2.2, with vehicular access provided by a new access road off Eagle Avenue. This road has been designed to serve both the 288 units approved and future development on the land at Woodcroft Farm Phase 3 within East Hampshire District. Catherington Park is now almost entirely built out.



Figure 2: Approved site layout for Catherington Park (Ref: APP/13/00804)



2.9. As shown from the above approved site layout, the site will be surrounded by residential development on two sides and therefore represents a logical, and sustainable site allocation, a principle that was incorporated within previous Regulation 18 consultations. The site lies directly adjacent to the current administrative boundary of Havant Borough Council and taking the site forward for development would result in a logical extension of suburban residential development, without having a detrimental impact upon the surrounding landscape.

### 3. Overview of Concept

- 3.1. The indicative masterplan for the site has been developed taking into account the site constraints and opportunities. Specifically, the arboricultural and ecological assets both within and adjacent to the site have significantly influenced the proposed layout and landscaping scheme, through the incorporation of suitable buffer zones in addition to a green corridor running from north-south through the centre of the site. On-site geological investigations, and technical flood risk and drainage assessments, have also influenced the proposed layout, in addition to feedback received from local residents and stakeholders at the public consultation event previously held.
- 3.2. The masterplan demonstrates that the site can be developed for up to 200 units with associated infrastructure, generous open space (including play spaces) and parking. The site is suitable for the development of a range of housing types and mixes and these can be delivered without harm to the surrounding landscape character.
- 3.3. In particular, the site would suit the accommodation of two and three bedroom homes given the site's edge of settlement location and assist with providing a gentle visual transition to the neighbouring woodland to the north of the site.
- 3.4. Any future development of the site would aim to achieve best practice in all aspects of design and sustainability. The key development principles would include the creation of a long-lasting residential development that responds to the features of the site, most notably the trees, biodiversity and natural landscape. A significant area of the site would be retained, managed and enhanced as ecological mitigation, to lessen any adverse impacts from the development, and providing the opportunity for new and existing residents to enjoy a superior natural setting of the site. New pedestrian walkways within the development would provide good access to local facilities, jobs and the existing community of Wecock Farm and Waterlooville to the south. The proposed development will contribute significantly to the local community whilst forming an important addition to the area.

Figure 3: Illustrative Masterplan



- 3.5. The approach to mirroring the perimeter block utilised to the south within Havant would allow for active frontages, which in turn promotes natural surveillance of streets and spaces and security through the development. Parking at a level in accordance with local parking standards would be provided through a combination of on-plot parking and small parking courtyards.
- 3.6. In terms of massing, it is assumed that buildings will be no more than three storeys in height to respond to local context.

### Transport and Access

- 3.7. The site is sustainably located relative to the Catherington Park development situated immediately to the south and the settlement of Horndean which is located immediately east of the site. An analysis of the site's location relative to local amenities demonstrates that a number of convenience retail, recreational/play

facilities, education and community facilities are located within easy access by sustainable modes of transport.

- 3.8. The site has good links to the local bridleway network being bound by byway 119/46/1 to the north, bridleway 108/1b/1 to the east and bridleway 119/30/1 to the west. The illustrative masterplan which demonstrates how the site may come forward, seeks to create new access points onto this bridleway network, allowing future residents enhanced access to the countryside as well as sustainable access to existing communities and services to the south and east of the site. In addition, the proposed masterplan incorporates an internal network of residential streets, cycle ways and pedestrian routes to promote permeability and legibility within the scheme as well as strong linkages to surrounding communities and facilities.
- 3.9. The site is also well serviced by existing bus routes, with three bus stops located in proximity to the site, all located along Eagle Avenue. Curlew Gardens Bus Stop is located to the east of the junction with Powell Drive and is a circa 6.5-minute walk from the site. The other two bus stops 'Dove Close' are located circa 180m south the junction with Powell Drive and is a circa 9-minute walk from the site.
- 3.10. The site can demonstrate a high-degree of functional connectivity to surrounding development and the wider area through access to pedestrian, cycle and bus infrastructure.
- 3.11. Vehicular access to the site can be provided via existing development at Catherington Park. Specifically, it is anticipated that the western parcel of development will be serviced by a vehicular access provided from Merritt Way to the southern side of the site, with an associated pedestrian access. The eastern parcel of development would be served by a vehicular and pedestrian access provided from Catherington Park to the eastern side of the site. The two parcels could then be linked by a pedestrian/cycle footpath (which will would serve as an emergency access) to ensure the two development parcels are interlinked.
- 3.12. Grainger Plc has commissioned a transport assessment of the site and this demonstrates that a development of up to 200 dwellings can be delivered on the site without significant impact upon the operation of the highway network in the context of paragraph 115 of the NPPF.

### **Sustainability and Energy Efficiency**

- 3.13. The site facilitates the south facing orientation of homes within the masterplan to make optimum use of natural light and thermal gain. Homes can be designed to be comfortable and energy efficient in terms of making the most of natural light, heat and ventilation. Comprehensive landscaping within and surrounding the site could provide shade and cooling for homes, and publicly accessible areas, as well as providing a pleasant and healthy residential environment.

### **Ecology**

- 3.14. The masterplan has been informed by ecological assessments and the resulting scheme seeks to retain and bolster the established vegetation to the boundary of the site, which provides both commuting and foraging opportunities for ecology. In addition, a generous 'green' core running through the centre of the development can provide nature focused areas, allowing flora and fauna to traverse through the scheme offering a significant biodiversity gain within the site.



### Nitrate Neutrality

- 3.15. Grainger Plc is aware of the requirement for any future development of the site to be 'nutrient neutral' in accordance with the requirements of the Habitat Regulations.

### Arboriculture

- 3.16. The mature treeline to the northern boundary of the site is subject to a group tree preservation order (ref. EH1122(10)), in addition to two mature oaks situated to the centre of the site (ref. EH1122 (10)). Additionally, James Copse to the north of the site is designated ancient woodland. The illustrative masterplan seeks to retain trees of arboricultural value whilst also ensuring suitable buffer zones are incorporated to layout to avoid future pressures for the loss of mature trees both within and surrounding the site.

### Ancient Woodland

- 3.17. James's Copse to the north of the site is designated ancient woodland. Arboricultural advice was sought at the earliest stage which has informed the illustrative masterplan. The site can be developed in a way that protects the Ancient woodland and there is scope to introduce suitable buffers in accordance with Natural England guidance.

### Flood Risk and Surface Water Drainage

- 3.18. A review of the Environment Agency Flood Risk Map confirms that the entire site is an area at low risk of flooding (Flood Zone 1). A central area of the site is acknowledged as being at increased risk of vulnerability to surface water flows. No development is proposed in this area of the site. Grainger Plc has commissioned a technical note to demonstrate that a future scheme can be suitably flood risk resilient whilst also ensuring that the risk of flooding is not increased off-site.

### Ground Conditions

- 3.19. Grainger Plc has commissioned extensive and intrusive ground investigations works. This has identified chalk solution features at specific locations within the site. The illustrative masterplan has therefore been informed by the findings of these investigations, which incorporates the chalk solution features within public open space and as landscaped features. This provides an opportunity for future schemes to provide generous leisure and ecological areas, which improve biodiversity and wellbeing.

### Summary of benefits of development at Land at Woodcroft Farm

- 3.20. The principal benefits of the development in economic, social and environmental terms (the three strands of sustainable development identified by paragraph 8 of the new NPPF) are therefore summarised in Table 1.

**Table 1: Summary of Key benefits**

<p><b>Economic Role</b></p>	<ul style="list-style-type: none"> <li>▪ Promoting connectivity to the adjacent settlement of Havant/Wecock Farm, a key centre with employment, community and service facilities</li> <li>▪ A readily developable site which will be available within the early stages of the Local Plan period</li> <li>▪ Estimated £264,000 Council Tax contribution per year</li> <li>▪ Inherent economic value brought about by development/construction</li> </ul>
<p><b>Social Role</b></p>	<ul style="list-style-type: none"> <li>▪ A site that can deliver up to 200 new homes and a suitable mix of housing including the provision of two and three bed properties that meets identified local housing needs</li> <li>▪ The site can provide a high-quality development that benefits the physical and mental health of future occupiers through providing a verdant and spacious living environment</li> <li>▪ A site that will be well-integrated with the existing settlements of Wecock and Horndean, promoting the development of cohesive communities</li> </ul>
<p><b>Environmental Role</b></p>	<ul style="list-style-type: none"> <li>▪ Promoting a landscape-led approach including landscape buffers and provision of semi-natural greenspaces</li> <li>▪ Incorporation of open spaces for active recreation, ecology and healthy lifestyles</li> <li>▪ Ecological enhancement (of at least the statutory requirement of 10% BNG)</li> <li>▪ A site that encourages access to services and amenities by sustainable means</li> </ul>

## 4. Response to Evidence Base Supporting The Regulation 18 Consultation

### Interim Settlement Policy Boundary Review Background Paper (January 2024)

- 4.1. Grainger Plc endorses the promotion of Horndean from a tier 3 to tier 2 settlement within the Regulation 18 Local Plan. It is considered that this revised assessment recognises the range of services and amenities contained within the settlement, in addition to acknowledging the settlement’s proximity to wider services that can be accessed within the adjacent settlement of Waterlooville.
- 4.2. Grainger Plc supports the recommendation that the settlement boundary for Horndean be revised to include Land at Woodcroft Farm.

### Integrated Impact Assessment for East Hampshire Local Plan (January 2024)

- 4.3. Grainger Plc concurs with the assessment provided at 6.3.3 of the report that the site scores very positively in terms of minimising carbon emissions as a consequence of the site’s high accessibility score and also the potential for fast broadband speeds to facilitate home working.
- 4.4. Woodcroft Farm is given the reference HD-024 within the Site Allocation Options, High-Level Assessment Score Summaries. The assessment criteria scores the site against a range of twelve objectives that span the three pillars of sustainability.

**Table 2: Grainger Plc Response to EHDC IIA Assessment for Land at Woodcroft Farm**

IAA Objective	Score	Response to IIA Score
To protect, enhance and restore biodiversity and geodiversity across the East Hampshire planning area	Mixed effect	<p>Grainger Plc supports the assessment under IIA in part.</p> <p>The score recognises that the site will not result in adverse effects on international nature sites.</p> <p>The site is scored as having a mixed effect on account of proximity to an area of ancient woodland and four areas of lowland mixed deciduous woodland priority habitat. The illustrative masterplan demonstrates that the site can be developed in a sustainable manner whilst also incorporating suitable landscape buffers between the built form of development and environmental sites to the north of the site. The various designations to the north of the site will therefore not be adversely effected by any future development of the site.</p> <p><b>It is therefore Grainger Plc’s position that they have demonstrated that the site should score as strong positive or minor positive effect against this criterion.</b></p>



IAA Objective	Score	Response to IIA Score
To minimise carbon emissions and contribute to achieving net zero carbon emissions in the East Hampshire planning area	Strong positive effect	The score acknowledges the sustainability credentials of the site. <b>Grainger Plc supports this assessment.</b>
To promote adaptation and resilience to climate change	Minor adverse effect	The score acknowledges that the site falls within Flood Zone 1 but also contains limited areas that maybe vulnerable to surface water flooding. Grainger Plc has commissioned a technical note that demonstrates that a future form of development can be brought forward that is suitably flood resistant and resilient without increasing the risk of flooding elsewhere. Future schemes can be designed to avoid areas at risk of surface water flooding.  <b>Grainger Plc acknowledges that the site has areas identified of potentially being at risk of surface water flooding but considers as a result of comprehensive analysis of the site that these risks can be comprehensively managed within the site.</b>
To promote accessibility and create well-integrated communities	Minor positive effect	The score recognises that the site is well-located relative to existing development.  <b>Grainger Plc considers that the site should be scored as a strong positive effect against this criterion when considering that the site borders existing residential development to the south and east, and is situated in such close proximity to amenities and services within Horndean and Waterlooville.</b>
To actively promote health and wellbeing across East Hampshire and create safe communities free from crime	Minor positive effect	Grainger Plc concurs with the assessment that the site would promote healthy lifestyles. The site can provide enhanced access to the PRow network, in addition to generous quantum of public open space.  <b>Grainger Plc supports this assessment.</b>
To strengthen the local economy and provide accessible Jobs and skills development opportunities for local residents	Minor positive effect	The site is well-located relative to existing employment opportunities situated within the settlements of Horndean and Waterlooville.  <b>Grainger Plc supports this assessment.</b>
To protect and enhance built and cultural heritage assets in the East Hampshire planning area	Uncertain effect	The site is situated approximately 400m to the southwest of Rose Cottage which is Grade II Listed. There is intervening residential development between the site and the heritage asset. Accordingly, it is considered that the site can be developed without any adverse impact upon this heritage asset.  <b>Grainger Plc considers that the site should be scored as having a neutral effect on heritage assets.</b>



IAA Objective	Score	Response to IIA Score
To provide good quality and sustainable housing for all	Strong positive effect	<b>Grainger Plc supports the assessment of the site against this criterion. The site has the capacity to deliver up to 200 homes in a sustainable location to meet local housing need.</b>
To conserve and enhance the character of the landscape and townscape	Minor adverse effect	<p>The score acknowledges that the site is located within 2km of the South Downs National Park.</p> <p>The site is visually very well-contained, even during the winter months, benefitting from the screening effects of vegetation and buildings within the immediate surrounding area. To the north, St. James's Copse and the adjacent strip of hedgerows adjacent to the BOAT screen views, whilst to the east views are limited by the mature oak trees and native hedgerow around the site and housing on Merritt Way beyond. To the south, further housing within Catherington Park (Merritt Way and Coddington Grove) together with mature oak trees and hedgerows around the site boundary also provide good screening, whilst to the west double hedgerows screen views from the wider countryside.</p> <p>Key views into the site are therefore limited to glimpses from the BOAT within the northern part of the site, the public bridleways immediately adjacent to the site's western and eastern boundaries and from short stretches of public highway and homes immediately adjacent to the site within Catherington Park to the south and east. Any development would therefore generate an extremely limited Visual Envelope.</p> <p><b>Grainger Plc considers, for the reasons set out above, that the site should be scored as having a minor positive effect, or neutral effect, when reviewing the site against this criterion.</b></p>
To support efficient and the sustainable use of East Hampshire's natural resources	Strong adverse effect	<p>The site is not part of an agricultural unit that is actively farmed. Additionally, Grainger Plc considers that any future development can be adequately managed without harm to the source protection zone.</p> <p><b>Grainger Plc considers, for the reasons set out above, that the site should be scored as having a lesser adverse effect than that given.</b></p>
To achieve sustainable water resource management and protect and improve water quality in the East Hampshire planning area	Strong adverse effect	<p>Grainger Plc considers that any impact from future development can be adequately managed without harm to the source protection zone.</p> <p><b>Grainger Plc considers, for the reasons set out above, that the site should be scored as having a lesser adverse effect than that given.</b></p>
To minimise air, noise and light pollution in the East Hampshire planning area	Neutral effect	<b>Grainger Plc acknowledges this assessment.</b>

## 5. Representations on the Draft East Hampshire Local Plan

### Overall response to Draft Local Plan

- 5.1. This section sets out Grainger Plc’s principle comments on the policies contained within the Draft Local Plan. Grainger Plc is generally supportive of the broad strategy taken by EHDC in the Draft Local Plan, however, it has some minor comments relating to the effectiveness and appropriateness of some individual policies, including the draft allocation itself. These are set out in detail within this section of the representations document, and in the interest of clarity the position is summarised in Table 3 below.

**Table 3: Summary of Grainger Responses to Key Policies within the Regulation 18 Local Plan**

HEADER 1	HEADER 2
Policy S1: Spatial Strategy	Support, but with modifications
Policy S2: Settlement Hierarchy	Support
Policy H1: Housing Strategy	Support, but with modifications
Policy H2: Housing Mix and Type	Support
Chapter 12: Site Allocations: Land at Woodcroft Farm	Support, with modifications

### Policy S1: Spatial Strategy

- 5.2. Grainger Plc supports this policy in principle and welcomes the reference at paragraph 3.6 of the document that the standard methodology will be used to generate a minimum housing number for the district. This is identified as 9,082 units over the plan period (excluding those areas of the District that fall within the South Downs National Park) or 478 units per annum.
- 5.3. Paragraph 3.8 of the plan comments that the total unmet needs of neighbouring authorities is unknown. The Partnership for South Hampshire (PfSH), of which EHDC is a member, identifies an unmet need of approximately 12,000 homes within the South Hampshire area by 2036 (PfSH Spatial Position Statement, Paragraph 3.10, December 2023). Grainger Plc considers that EHDC should allocate further housing sites to assist in meeting this unmet need, in accordance with the NPPF, within its administrative area.
- 5.4. It is noted that the Council considers that 1,320 dwellings will come forward through windfall sites during the duration of the Local Plan (paragraph 3.25). It is considered that this number is high in the context of historic delivery provided by windfall sites within the district. Grainger Plc considers that allocating a greater number of housing sites within the Local Plan would place a lesser reliance on windfall sites to deliver development and would assist EHDC in preparing a positive and deliverable Local Plan in accordance with paragraph 16 of the NPPF.

### Modification to supporting text of Policy S1 Proposed by Grainger

- EHDC should give consideration to planning for additional housing growth within the district to meet the substantial unmet need contained within the PfSH area
- EHDC should allocate an increase number of housing sites to ensure a reduce reliance is placed upon windfall sites and the housing needs of the District can be positively planned for

### Policy S2: Settlement Hierarchy

- 5.5. Grainger Plc supports the classification of Horndean as a tier 2 settlement. This classification is reflective of the range of services and amenities contained within the settlement, in addition to acknowledging the settlement's proximity to wider services that can be accessed within the adjacent settlement of Waterlooville.
- 5.6. Grainger Plc supports the inclusion of Woodcroft Farm within the Settlement Policy Boundary for Horndean, as illustrated on the associated settlement policies map. The presumption in favour of sustainable development within the Settlement Policy Boundary is noted.

### Policy H1: Housing Strategy

- 5.7. Grainger Plc supports the hierarchical approach to allocating housing in accordance with the settlement tiers.
- 5.8. For the reasons set out in the response to Policy S1, Grainger Plc considers that EHDC should consider planning for a greater quantum of housing than the 3,500 units identified within this policy.

### Modifications to Policy H1 Proposed by Grainger Plc

Grainger Plc consider that EHDC should consider planning for a greater quantum of housing than the 3,500 units identified within this policy.

### Policy H2: Housing Mix and Type

- 5.9. Grainger Plc notes that the proposed requirement to ensure a range of house types, tenures and sizes are provided.
- 5.10. Grainger Plc consider that Land at Woodcroft Farm Phase 3 is suitable for delivering a range of units sizes across a full-spectrum of housing tenures.

### Chapter 12-Site Allocations-HDN1-Land at Woodcroft Farm

- 5.11. Grainger Plc acknowledges that it has historically promoted the site for 170-180 dwellings. Following detailed capacity testing and masterplanning, it is considered that the site could support up to 200 residential dwellings at a density that is respectful to the character of the surrounding area and provides the requisite ecological, arboricultural and geological buffers. Additionally, the site can provide generous

quantums of public open space, potentially could comprise equipped play areas, informal play areas and a community orchard.

- 5.12. The illustrative masterplan provided at Figure 3 takes into account the constraints and opportunities identified by EHDC. This includes the provision of extensive green infrastructure running from north-south through the site and enhanced connections to the surrounding PRow network. Additionally, the site can be developed in a manner that could ensure that the verdant site boundaries and are retained.
- 5.13. Grainger Plc does not consider that any of the identified constraints would adversely effect the deliverability or developability of Land at Woodcroft Farm Phase 3.
- 5.14. Grainger Plc wholeheartedly endorses the summary for reasons for inclusion. Specifically, the recognition that all technical environmental constraints on the site can be overcome with careful design is acknowledged and welcomed.
- 5.15. Grainger Plc acknowledges the details of the possible infrastructure for the site.

### **Modifications to site allocation HDN1 proposed by Grainger Plc**

Grainger Plc considers that the illustrative masterplan demonstrates that the site developable for up to 200 residential dwellings.

## 6. Conclusion

- 6.1. Overall, Grainger Plc broadly welcomes the direction of travel of the emerging EHDC Local Plan and welcomes the robust and justified allocation of Land at Woodcroft Farm. However, as set out in this document, it requests some minor modifications to policies as the plan progresses, in order to ensure that the plan can be considered sound and deliverable.
- 6.2. Land at Woodcroft Farm has the ability to provide a high-quality living environment and a sustainable residential development of up to 200 units without harm to any environmental designations. Grainger Plc's aspiration is to create a layout which responds to and enhances the site's physical and ecological characteristics, creating a strong sense of identity and allowing the surrounding nature and landscape to form an integral part of the settlement of Horndean.
- 6.3. Grainger Plc wishes to be kept informed as work on the draft plan progresses to Submission version stage, and would welcome a meeting with EHDC officers to discuss any of the comments made in these representations.



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East Hampshire District Council  
Planning Policy Team  
By email only

**planning issues**  
TOWN PLANNING AND ARCHITECTURE

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4<sup>th</sup> March 2024

Dear Planning Policy Team,

**CHURCHILL RETIREMENT LIVING  
RESPONSE TO THE EAST HAMPSHIRE DISTRICT COUNCIL LOCAL PLAN  
(REGULATION 18) CONSULTATION.**

Policy CLIM2 - Net zero carbon development: Operational Emissions

The Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2050 is commendable and detailed in the justification to CLIM2.

The wording of the policy requires all new developments to be 'zero carbon by design' from the point of adoption with additional reporting required for space heating, EUI targets, Energy Performance and Energy Demand Management. There is no established framework cited for reporting or assessing these metrics.

There is considerable momentum from Government in preparing enhanced sustainability standards through *The Future Homes Standards* and it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. By the time the Local Plan is adopted (2025) new homes built will be required to produce 75-80% less carbon emissions than homes built under the current Building Regulations (2013).

This will be a considerable challenge for the house-building industry who will require time to develop the materials and the skills necessary to build zero carbon homes in the volumes required to meet housing standards.

It is therefore our view that the stepped approach to net zero in the Building Regulations is more pragmatic, as it allows developers appropriate time to suitably amend their designs and specifications in an efficient way and for the cost of energy efficiency technologies to fall.

We respectfully remind the Council that the PPG states that "*The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan*" (Paragraph: 002 Reference ID: 10-002-20190509).

In the event that East Hampshire retains the existing requirement for all new residential development to be net zero, the additional costs should be allowed for in the forthcoming *Plan Wide Viability Assessment*.

Policy H3 - Affordable housing

The consultation has not made a Local Plan Viability Assessment (LPVA) publicly available. There is therefore no evidence demonstrating that the affordable housing requirements proposed viable.

We would highlight that the respondents were surprised that a Planning Authority would choose to publish a (Regulation 18) Local Plan without having ascertained that the policies within it are deliverable. We advised that by limiting scrutiny of the Local Plan Viability Assessment to the Regulation 19 consultation the Council is reducing the opportunities for comment on a crucial element of the evidence base and the Local Plan would be less robust as a consequence.

We would highlight that Paragraph 58 of the NPPF states that:

*...All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.*

The PPG makes it clear that Local Plan process is a collaborative process stating that *'It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers* (Paragraph: 002 Reference ID: 10-002-20190509).

By limiting the opportunities for comment of the Local Plan Viability Assessment we are of the view that the Council has deviated from national guidance and the Local Plan is not considered positively prepared, justified, effective and crucially is consistent with national policy.

#### Policy H5 – Specialist Housing

Churchill Retirement Living is an independent, privately owned housebuilder specialising in sheltered housing for older people.

Paragraph 1 of the PPG Housing for Older and Disabled people states:

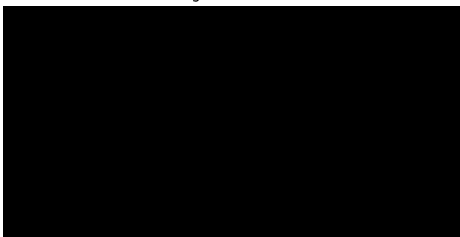
*"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. .... Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking".*

Paragraph: 001 Reference ID: 63-001-20190626

The supporting text to this policy recognises that delivery of an appropriate quantum of specialist older persons' housing to meet the needs of both Council's elderly residents will be a significant challenge over the Local Plan period.

The Council supports the delivery of specialist older persons' housing on appropriate sites, principally on well located sites within the urban area. This is commendable and the policy is supported accordingly.

Yours faithfully







February 2024

East Hampshire Local Plan Reg.18 Part 2 Consultation – Representations on behalf European Property Ventures (Hampshire) Ltd

## **Representations to East Hampshire Regulation 18 Part 2 Local Plan Consultation**

### **1. Introduction**

- 1.1. Claremont Planning has been instructed by European Property Ventures (Hampshire) Ltd to prepare and submit representations to the consultation on the East Hampshire Draft Local Plan Regulation 18 Part 2 consultation, which is currently being undertaken by East Hampshire District Council.
- 1.2. These representations identify fundamental concerns with the proposed disaggregated approach proposed to calculating the housing requirement for the District, whereby this is not considered to represent a positive approach to securing the delivery of new development and fails to adequately identify and provide for unmet need arising from the South Downs National Park. The designation of a European Property Ventures (Hampshire) land east of Lindford Chase as a settlement gap is also objected to through these representations. The settlement gap proposed at Lindford conflicts with the Reg.18 Local Plan's identification of the settlement as a location for growth during the Plan period through to 2040 by significantly constraining opportunities for the future expansion of the settlement.

### **2. Spatial Strategy**

#### Disaggregated Approach to Housing Requirements

- 2.1. Draft Policy S1 of the Reg.18 Local Plan provides the proposed spatial strategy for the District, establishing that in the Plan period through to 2040 provision will be made for the delivery of at least 9,082 new dwellings within the District. The supporting text to draft Policy S1 identifies that the Council have adopted a disaggregated approach to the standard method housing requirement for the District, on the basis that East Hampshire District also contains part of the South Downs National Park within which development is planned for by the South Downs National Park Authority.
- 2.2. Paragraph 3.6 of the Reg.18 Draft Plan identifies that the standard method housing requirement for East Hampshire District (including the South Downs National Park) for the Plan period 2021-2040 is 10,982 dwellings. The Reg.18 Draft Plan however suggests that when taking forward a disaggregated approach to the standard method between the two local planning authorities, the housing requirement for the East Hampshire Local Plan Area, excluding the National Park area, can be reduced to a housing need of 8,816 dwellings over the Plan period. Paragraph 3.8 of the Reg.18 Local Plan continues on to recognize the potential for unmet need arising from adjacent authorities to be accommodated within the East Hampshire Local Plan Area, particularly from the South Downs National Park (SDNP) area considering the landscape sensitivity associated with the National Park. In order to estimate the unmet housing need likely to arise from the SDNP Area, the Council have undertaken an assessment based upon past delivery and historic agreements with the South Downs National Park Authority (SDNPA). Based upon this assessment, the Reg.18 Draft Plan proposes to provide for the delivery of 14 dwellings per annum of unmet need arising from the SDNP area within the East Hampshire Local Plan Area.
- 2.3. The approach to determining the housing requirement for the Plan period 2021-2040 outlined within draft Policy S1 is not supported. Whilst it is acknowledged that development for the part of the SDNP that is located within East Hampshire District is planned for by the SDNPA, the Council must appreciate that housing delivery within the National Park area is significantly constrained. Indeed, National Planning Policy

affords significant weight to the conservation and enhancement of the landscape and scenic beauty of the National Park, whilst Paragraph 183 of the National Planning Policy Framework (the Framework) provides that major development within the National Parks should be refused, other than in 'exceptional circumstances'. As such, there are clear constraints to the delivery of new development within the SDNP area. The emerging East Hampshire Local Plan should seek to positively respond to these constraints to development within the SDNP area, given the close functional and geographical relationship between the SDNP and the East Hampshire Local Plan Area and to ensure that the Local Plan is positively prepared in accordance with Paragraph 16 of the Framework.

- 2.4. The Reg.18 Draft Local Plan estimates unmet need arising from the SDNP Area to be 14 dwellings per annum, equating to 266 dwellings over the Plan period to 2040 based upon historical delivery rates and past agreements with the SDNPA. This approach to determining the level of unmet need is not supported, and critically is not considered to be informed by proportionate evidence, as required by Paragraph 35 of the Framework. Critically, the SDNPA recently commenced a Local Plan review in 2023 and have now completed some initial evidence based work in relation to housing need. This work included the publication of an Housing and Economic Development Needs Assessment (HEDNA) which identifies a housing need of 6,300 dwellings within the National Park Area between 2024 and 2042. In light of the initial evidence based work undertaken by the SDNPA to inform the Local Plan review, it is apparent that there is an opportunity for both authorities to work collaboratively in order to determine an up-to-date position on housing need, particularly with respect to the level of unmet need that is anticipated to arise from the SDNP Area. Although the Levelling Up and Regeneration Act removed the statutory requirement for authorities to satisfy the Duty to Cooperate; it remains that joint working is imperative to ensure that both the East Hampshire Local Plan, and the SDNP Local Plan Review can be found sound at Examination in accordance with Paragraph 35 of the Framework which requires that Local Plans are informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with achieving sustainable development.
- 2.5. With reference to Paragraph 35 of the Framework, it should also be acknowledged that the South Downs part of East Hampshire is a predominantly rural area with few large settlements, aside from Petersfield. The emerging East Hampshire Local Plan should therefore adopt a positive approach to addressing any unmet housing need arising from the SDNP Area, recognizing the role of the East Hampshire Local Plan in promoting sustainable patterns of development by focusing growth towards more sustainable settlements rather than directing growth to less suitable locations within the rural area.
- 2.6. Accordingly, it is strongly advised that the Council undertake early and proportionate engagement with the SDNPA to ensure that any unmet need arising from the National Park area can be accommodated at sustainable locations within the East Hampshire Local Plan Area. The approach currently proposed by draft Policy S1 of the Reg.18 Local Plan seeks to adopt a reduced housing requirement, justifying this by allocating a portion of growth to the part of the District located within the SDNP. Robust justification for this approach has not been provided within the Reg.18 Local Plan, and crucially the emerging Local Plan is not supported by any evidenced based work to indicate that the SDNPA have agreed to this. As currently drafted, the Reg.18 Local Plan fails to satisfy the basic tests for soundness provided within Paragraph 35 of the Framework whereby the emerging Local Plan cannot be considered to be positively prepared and certainly is not based upon robust and proportionate evidence.

### Windfall Allowance

- 2.7. Paragraph 3.25 of the Reg.18 Local Plan identifies that the housing requirement for the Plan period through to 2040 will be principally met through existing net completions and extant planning permissions, with a windfall allowance of 1,320 dwellings also provided for during the Plan period. The Reg.18 Local Plan is accompanied by a Windfall Allowance Methodology Paper which seeks to justify the relatively high windfall allowance proposed by the Reg.18 Plan based upon an analysis of past trends relating to completions and windfall development within the District between 2011-2023.
- 2.8. The analysis undertaken by the Council identifies that a total of 1,480 dwellings were delivered on windfall sites within the period 2011-2023, equating to 25.3% of total housing completions within the District during that period. It is not disputed that levels of windfall development have been relatively high within the District, however it is considered that the Council have failed to properly acknowledge the contextual matters that would have likely informed this. Notably, the adopted Joint Core Strategy became five years old in June 2019, and therefore would have been considered out-of-date for the purposes of calculating five year housing land supply and determining planning applications. The Council published an updated Five Year Housing Land Supply position in October 2023, which confirms that housing delivery since 2011 has not been sufficient to meet the adopted Joint Core Strategy requirement, whilst the Council are also unable to demonstrate a five year supply of sites coming forward to meet the standard method requirement for the District, with only 4.5 years of housing supply able to be demonstrated as of 1 April 2023. A further addendum published in December 2023 confirmed that even when accounting for the new provisions in the latest NPPF whereby qualifying authorities such as East Hampshire can benefit from a four year supply requirement, the Council was unable to demonstrate this with only 3.78 years supply by that measure.
- 2.9. In the context of a five year supply and housing delivery shortfall, it should be expected that the quantum of development coming forward on windfall sites will be proportionately higher as the presumption in favour of sustainable development, as set out at paragraph 11 of the Framework applies meaning that the Council is more likely to be faced with speculative applications on sites not allocated in the Development Plan. In this context, the previously high levels of windfall development within the District cannot be considered to provide appropriate justification for the windfall allowance proposed by the Reg.18 Local Plan. It is contended that the Windfall Allowance Methodology Paper prepared by the Council fails to provide the compelling evidence required by Paragraph 72 of the Framework to demonstrate that windfall sites will provide a reliable source of supply throughout the Plan period.
- 2.10. The Windfall Allowance Methodology Paper prepared by the Council also provides an analysis of windfall completions in relation to site size, identifying that since 2000 a larger number of windfall completions, an average of 63 dwellings per annum, have occurred on smaller sites. It is contended that the proposed windfall allowance identified by the Reg.18 Local Plan fails to provide a positive approach to development. It will instead deliver piecemeal growth which will fail to ensure the coordinated provision of infrastructure to support new development within the District, whilst windfall delivery on small sites is less likely to secure meaningful delivery of affordable housing needed in the District. The windfall allowance identified by the Council is considered to conflict with Paragraph 20 of the Framework which provides that strategic policies should establish an overall strategy for the pattern, scale, and design quality of places which make sufficient provision for the delivery housing and infrastructure. To ensure that the emerging Local Plan facilitates a sustainable and coordinated distribution of development which is supported by the requisite infrastructure, it is advised that the proposed windfall allowance is reduced,

and sufficient sites to at least meet the Council's housing need in full are identified for growth through the Local Plan. The land under European Property Ventures (EPV) (Hampshire) Ltd's control East of Lindford Chase is suitable and available for development and represents a logical extension to the sustainable settlement of Lindford.

#### Plan Period

- 2.11. As identified by draft Policy S1 of the Reg.18 Local Plan, the emerging Plan period is proposed to extend through to 2040. Paragraph 22 of the Framework requires that strategic policies look ahead over a minimum fifteen year period from adoption in order to anticipate and respond to long term requirements and opportunities. The Plan period proposed by draft Policy S1 of the Reg.18 Local Plan would only just satisfy this requirement, assuming that the Local Plan is adopted in 2025/26 in accordance with the timescales envisaged by the Council's Local Development Scheme. The Plan period as currently proposed fails to provide any contingency if the preparation or subsequent Examination of the Local Plan is delayed. Accordingly, it is advised that the Plan period should be extended by at least one or two years, until 2041/42 to ensure that the Local Plan looks ahead for the requisite fifteen year period and is consistent with national policy.

### **3. Settlement Hierarchy**

- 3.1. The proposed settlement hierarchy for the District is provided by draft Policy S2 of the Reg.18 Local Plan, identifying Whitehill & Bordon (including Lindford) as higher order 'Tier 2' settlements. The revised settlement hierarchy is supported by a corresponding topic paper prepared by the Council, which provides details of an accessibility study undertaken by the Council. The Settlement Hierarchy Topic Paper confirms that, based upon the findings of the Council's accessibility study, the settlement of Lindford should be promoted within the hierarchy due to the settlement's close proximity to a range of services and facilities provided at Whitehill & Bordon and the accessibility of these by sustainable modes of transport. The identification of Lindford as a higher order settlement within the District is strongly supported on behalf of European Property Ventures (Hampshire). It is maintained however, that Lindford represents a sustainable location for growth in its own right, by virtue of the services and facilities to meet local needs which are provided at the settlement and are further complemented by those available at Whitehill & Bordon to the south west.
- 3.2. Draft Policy S2 of the Reg.18 Local Plan establishes that the revised settlement hierarchy will provide the basis for the broad distribution of development throughout the Local Plan Area. Claremont Planning are supportive of this proposed approach to the distribution of growth and maintain that growth should be directed towards Linford in recognition of the settlement's sustainability as a location for growth. The land under EPV (Hampshire) control East of Lindford Chase is suitable and available and can come forward for development in the early years of the Plan period post adoption in order to contribute to the delivery of sustainable development at the settlement. The accessibility of EPV (Hampshire) land East of Linford Chase should be appreciated in this respect whereby services and facilities located along Liphook Road are accessible within a five minute walk from the site.

### **4. Wealden Heaths Special Protection Area**

- 4.1. Draft Policy NBE4 of the Reg.18 Local Plan relates to the Wealden Heaths Special Protection Area (SPA) sites. The draft Policy provides that no net gain in residential dwellings will be permitted within 400m of the Wealden Heaths Phase II SPA unless the proposals are accompanied by an Appropriate Assessment which demonstrates that the development would not result in harm to the SPA. The Appropriate

Assessment would require agreement from the Local Planning Authority in consultation with Natural England. The Reg.18 Local Plan is accompanied by a draft Habitat Regulation Assessment, published in January 2024, and which confirms that Natural England will not support residential development within 400m of the Wealden Heaths Phase I or Phase II SPA.

- 4.2. The north eastern extent of the land under EPV (Hampshire) control East of Lindford Chase is located within the 400m buffer to the Wealden Heaths Phase II SPA, whilst the remainder of the site area is located within the 5km buffer. The site's partial location within the 400m buffer to the Wealden Heaths Phase II SPA is recognized through these representations, but it is not considered to represent an overall constraint to the site's development. Indeed, this has been previously recognized by the Council through the 2018 Land Availability Assessment which, in relation to the promoted site, identified that Care Homes can be considered suitable uses for location within 400m of the SPA. This is because the potential for recreational impacts on the SPA are likely to be lower for Care Homes, subject to the mobility of residents. The site is well located to provide residential care accommodation, by virtue of its location adjacent to the established settlement boundary of Lindford and the accessibility of local services and facilities by sustainable modes of transport from the site.
- 4.3. Notwithstanding the site's suitability to accommodate a care development, the south western part of the site is located outside of the 400m buffer, and within the 5km buffer to the Wealden Heaths Phase II SPA. The Habitat Regulations Assessment (HRA) which accompanies the Reg.18 Local Plan identifies that a total of 12 housing allocations are proposed within the 5km buffer, demonstrating that development within the 5km buffer is necessary in order to meet the emerging housing needs of the District. Based upon existing visitor data for the Wealden Heaths Phase II SPA, all emerging developments located within the 5km buffer zone will require mitigation in relation to recreational pressure which the HRA identifies can be provided in the form of Suitable Alternative Natural Greenspace (SANG) alongside Suitable Access Management and Monitoring (SAMN). For the Wealden Heaths Phase II SPA, the Council is also exploring the Wealden Heaths Infrastructure Projects (WHIPS) which are generally smaller-scale and more flexible projects than SANG and would be tailored towards specific geographic locations and /or residential developments progressed in consultation with Natural England.
- 4.4. On the basis that development within the 5km buffer to the Wealden Heaths Phase II SPA is necessary in order to deliver the level of growth required during the Plan period to 2040, it is contended that EPV (Hampshire) land East of Lindford Chase should be positively considered for development whereby a residential development could be accommodated at the south-western extent of the site, with the northern-eastern part of the site to be set aside to provide recreational mitigation. EPV (Hampshire) are amenable to exploring opportunities to provide new linkages into the existing Bordon Inclosure SANG alongside the site's development, or alternatively opportunities to utilize this area of the site for a WHIP could be explored. Notably, Footprint Ecology's 'Wealden Heaths Infrastructure Projects Background and Guidance' report establishes that WHIPs can involve any green space that provides for informal recreation, however that these should represent realistic alternatives to the heaths being reasonably close to the heaths and located at rural, countryside sites. EPV (Hampshire) land East of Lindford Chase is considered to be an opportune location for the delivery of a WHIP alongside residential development, being located adjacent to the established settlement boundary but also within close walking distance of the Bordon Inclosure SANG, and reasonably close to the Phase II SPA.

## **5. Gaps Between Settlements**

- 5.1. Draft Policy NBE11 identifies a series of 'gaps between settlements' within which new development will be restricted to schemes which maintain the open character and appearance of the countryside between settlements. The Reg.18 Local Plan identifies a settlement gap enclosing Lindford and which includes the land under EPV (Hampshire) control East of Lindford Chase. The identified settlement gap at Lindford is strongly objected to. It is considered that the settlement gap at Lindford fundamentally conflicts with the Reg.18 Local Plan's identification of the settlement as a sustainable location for growth by significantly constraining opportunities for the future expansion of the settlement.
- 5.2. On behalf of EPV (Hampshire), it is not considered that the designation of the land east of Lindford Chase within the proposed settlement gap is appropriate or justified. The land east of Lindford Chase relates well to established built form at the settlement to the south, whilst the site's northern boundary is strongly defined by established mature vegetation and the River Wey. These natural features would provide a strong new defensible boundary to the settlement extent should the development of the land east of Lindford Chase be progressed. Additionally, it should also be recognized that EPV (Hampshire) site is located adjacent to the established Bordon Inclosure which is designated as SANG. Accordingly, Bordon Inclosure represents an established feature which maintains the separation between the settlements of Bordon and Lindford such that the identification of additional policy designations to secure this separation is considered unnecessary.

## **6. Housing**

- 6.1. Part C Chapter 9 of the Reg.18 Plan relates to housing and the changing population. Supporting text provided at Paragraphs 9.8 and 9.9 of this Chapter identify that a key driver of population change within the District has been a 30% increase in the 65 and over age group between 2011 and 2020. Over the emerging Plan period, there is anticipated to be a further 36% increase in those aged over 65. Draft Policy H5 of the Reg.18 Local Plan provides that proposals for specialist and supported housing that meets the needs of older persons or others requiring specialist care will be supported on sites within the countryside provided that there is a proven local need for the development that cannot be met within the existing built up area whilst also requiring that the site is well related to the existing settlement.
- 6.2. It is considered that draft Policy H5 adopts a positive approach to facilitate the delivery of accommodation to meet the needs of older people within the District. However, it is considered that the Council should take this further and identify specific sites to deliver care and extra-care accommodation through the Local Plan to ensure that the need for older persons accommodation within the District will be positively addressed. The suitability of the land under EPV (Hampshire) control East of Lindford Chase for a care development has been demonstrated through these representations by virtue of the site's sustainable location adjacent to the settlement boundary. The site's partial location within the 400m buffer to the Wealden Heath Phase II SPA does not represent a constraint to the site's development given the very limited recreational pressure likely to be generated by a care development on site.

## **7. Site Allocations**

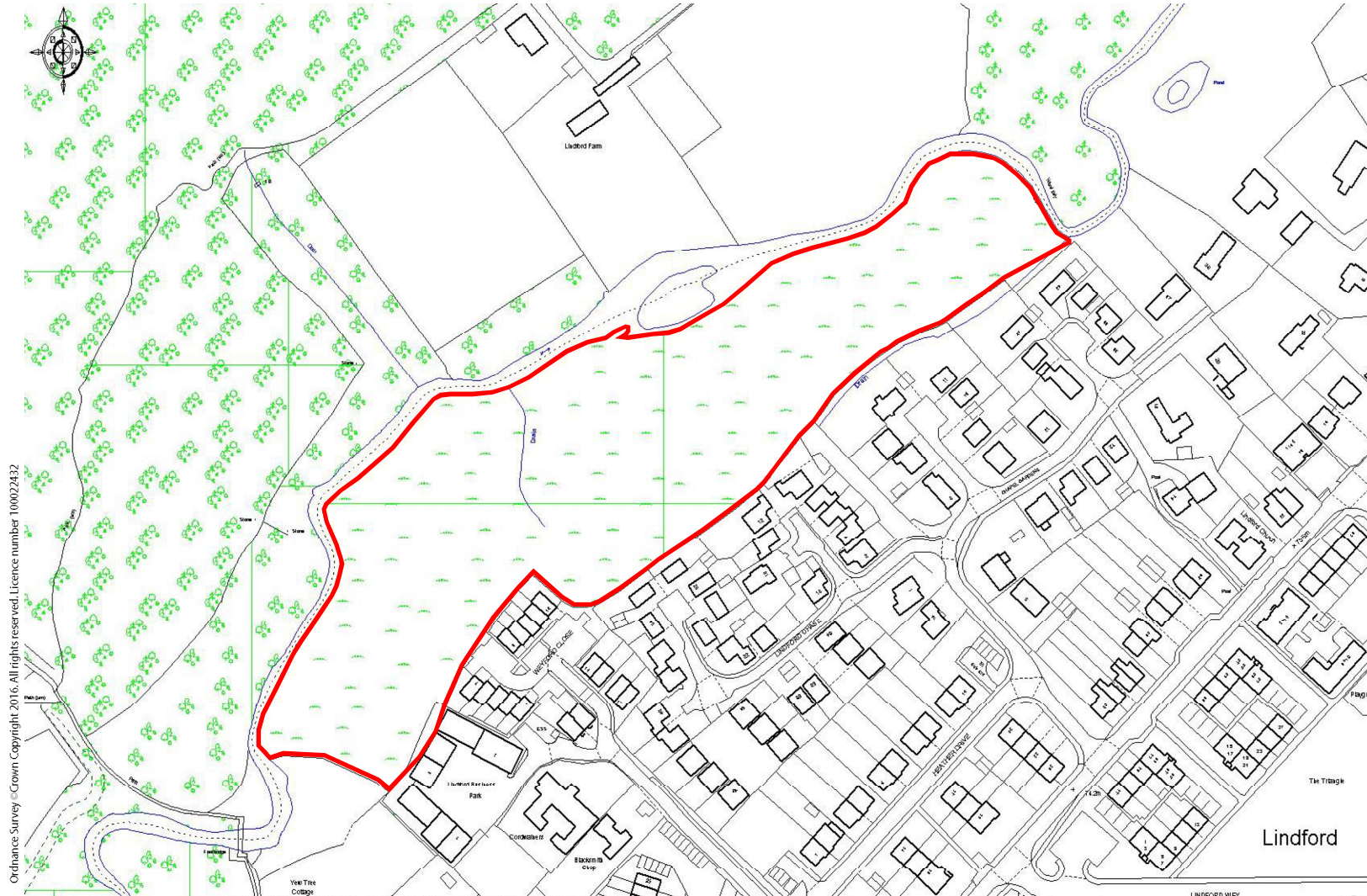
- 7.1. Chapter 12 of the Reg.18 Draft Plan provides details of the proposed site allocations for the emerging Plan period. This Chapter of the Reg.18 Local Plan identifies Whitehill and Bordon (including Lindford) as higher order Tier 2 settlements, recognising that these settlements provide a relatively large range of facilities and services for meeting some of the everyday needs of local residents. New housing allocations to deliver a total of 667 homes are identified at Whitehill and Bordon, however there are no housing allocations proposed specifically at Lindford. Whilst the Reg.18 Local Plan's identification of Whitehill, Bordon and Lindford as sustainable locations for growth is supported; the failure to identify any allocations for new


growth at Lindford is objected to. Paragraphs 96 and 97 of the Framework establish the imperative for planning policies to aim to achieve healthy, inclusive, and safe places whilst providing the social, recreational and cultural facilities the community needs. The concentration of growth at Whitehill and Bordon fails to secure the delivery of an appropriate scale of development at Lindford to support the vitality and viability of the community. The land under EPV (Hampshire) control, East of Lindford Chase, presents the opportunity to deliver a residential or care development alongside public open space that can contribute positively to the delivery of sustainable new growth at the settlement.



**Notes**

1. This drawing has been prepared in accordance with the scope of Claremont Planning Consultancy's appointment with its client and is subject to the terms and conditions of that appointment. Claremont Planning Consultancy accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.



<p><b>Project</b> Land adjoining Lindford Chase, Lindford</p> <p><b>Title</b> Site Location Plan</p>	<p><b>Drawing Number</b> CLR002-1</p> <p><b>REV</b> 00</p>	<p><b>Status</b> FINAL</p> <p><b>Job Ref</b> CLR002</p>	<p><b>Drawn By</b> JP</p> <p><b>Scale @ A4</b> 1:2500</p>	<p><b>PM/Checked by</b> KE</p> <p><b>Date Created</b> 13/05/2016</p>	<p><b>Approved</b> Approved</p>	 <p>Claremont Planning Consultancy Suite 205 - Second Floor, 2 Snow Hill, Snowhill, Birmingham B4 6GA T: 0121 231 3610 M: 077791 12641</p>
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## East Hampshire Local Plan 2021-2040 Regulation 18 Consultation February 2024

Representations submitted on behalf of AMK Chauffeur Drive Ltd, Mill Lane, Passfield Mill Business Park, Passfield, GU30 7RP

The East Hampshire Employment Land Review 2023 recognises Passfield Mill Business Park as an existing employment site within a rural area. The review states that its accessibility is poor but this is normal for an employment area that is providing for those uses which would not be acceptable within a residential area. It is important that employment sites are available for those uses which need a more remote location or a specific type of accommodation which would not be appropriate within a heavily populated area. The Review also considers the character and market attractiveness to be poor, which would be improved by expanded the Business Park. Passfield Mill is one of the larger employment sites within a rural area and provides for uses which would be hard to accommodate within a settlement or would not be acceptable within settlement boundaries close to main populations. It provides an important role in the employment provision of East Hampshire.

AMK Chauffeur Drive occupy one of the units at Passfield Mill and are proposing extending the Business Park onto land they own to the south of the existing Business Park( a proposed masterplan is included for information). The site was submitted to the Council's call for sites in 2018. They wish to make the following comments on the Regulation 18 Draft Local Plan.

Objective A2 is supported especially the following -

*“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 and buildings for business that is the right type and in the right location, including the rural areas;”*

We object to Policy S1

*S1.2 Employment Needs (office, light industrial, industrial and warehousing) will be met through the intensification of existing strategic employment zones and local employment sites, as well as the delivery of additional employment floorspace that is compatible with residential use in existing centres. All Retail needs will be met within existing centres.*

S1.2 should include for additional employment floor space provision which is not compatible with residential use which should be located at rural employment sites where is it appropriate.

Chapter 10: Supporting the Local Economy. We support Objective A2: Providing sustainable levels of growth through the Local Plan. We especially support the employment floorspace in rural areas.

We support Policy E1 Planning for Economic Development.

Especially the recognition that

*c. Within the countryside, proposals will be required to demonstrate a need for development at that location and compliance with other plan policies.*



**Illustrative Site Layout**

We object to Policy E2 Maintaining and Improving Employment Floorspace  
Paragraph 10.39 should also support the expansion of rural employment areas in appropriate circumstances.

Employment sites within rural areas can provide for uses which would not be acceptable within settlement boundaries close to main populations. Expanding existing rural employment areas would have a number of benefits such as grouping employment uses which are incompatible with existing built up residential areas together. Expanding such area could also lead to complementary uses being provided which would reduce journeys and could lead to multi destination trips from a single journey to the site.

We object to Policy E3: Rural Economy  
The policy should also include for the expansion of employment sites in rural areas in appropriate circumstances.

Employment sites within rural areas can provide for uses which would not be acceptable within settlement boundaries close to main populations. Expanding existing rural employment areas would have a number of benefits such as grouping employment uses which are incompatible with existing built up residential areas together. Expanding such area could also lead to complementary uses being provided which would reduce journeys and could lead to multi destination trips from a single journey to the site.

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

localplan@easthants.gov.uk

29<sup>th</sup> February 2024  
Ref. JF/0235

Dear Sir/Madam,

## **REPRESENTATIONS TO DRAFT LOCAL PLAN 2021-2040 (REGULATION 18)**

I write on behalf of my client, [REDACTED], to make representations to East Hampshire District Council's Draft Local Plan 2021-2040 (Regulation 18), which is currently out for consultation. Our client is the freeholder owner of a major site in Alton (land west of Old Odiham Road), and has previously engaged with various planning policy consultations including a Call for Sites. Their site is included within the LAA (ref LAA/AL-029).

### **Representations**

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

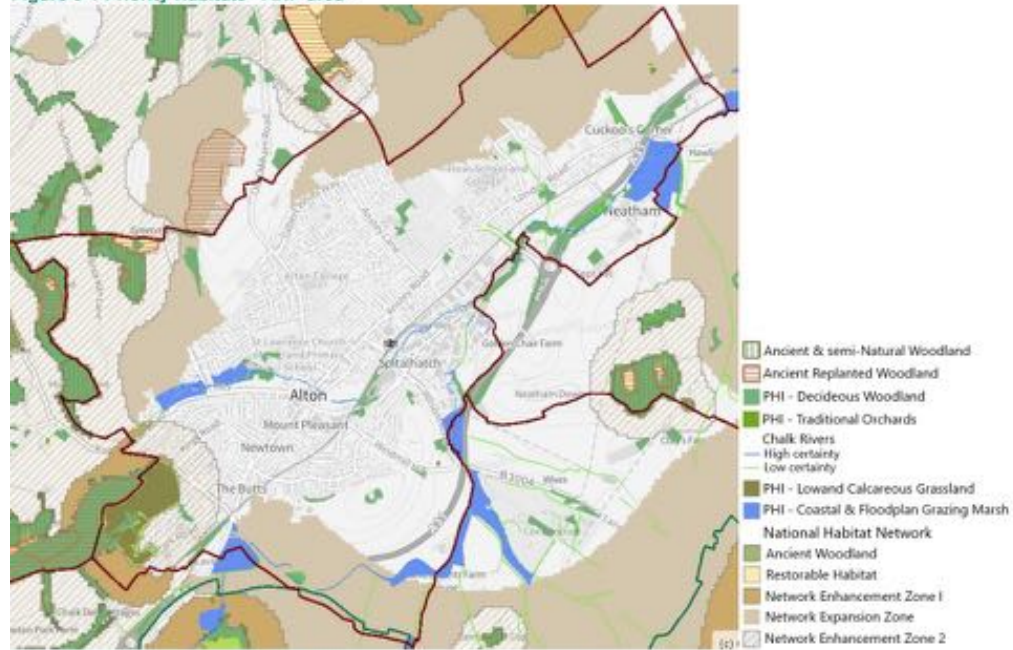
Our client objects to the newly designated 'new Strategic Semi-natural Green Space' to the north of Alton. Figure 5.4 of the draft Local Plan is ambiguous in terms of where the exact delineation of the designation is, but it appears to include at least part of my client's site to the north of Alton.

Whilst there are areas of green infrastructure to the north of Alton that meet the definition at page 129 of the draft plan. including the allotments to the south of the site and Greenfields Recreation Ground to the north west of Alton, my client's site is a large arable field in agricultural use. This has very limited contribution to green infrastructure. It is not publicly accessible nor does it contribute to the local community, and it should not be included within the 'green infrastructure' designation.

Two excerpts from The Alton Neighbourhood Plan Strategic Environment Assessment are below. The first shows no special or protected habitat on my clients site. The second shows Natural England's Green and Blue Infrastructure. This map clearly shows a patchwork of green infrastructure rather than a continuous belt across of the north of Alton.

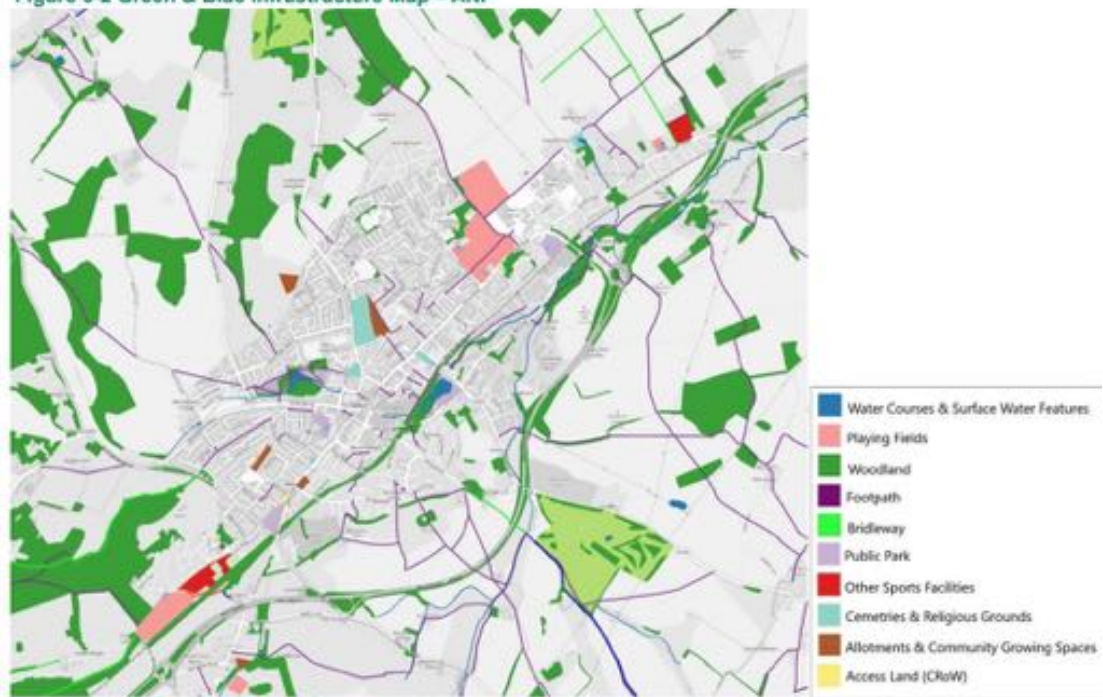


Figure 3-1 Priority Habitats - ANP area<sup>4</sup>



Map 1 Priority Habitats (Source ANP SEA)

Figure 5-2 Green & Blue Infrastructure Map – ANP



Source: [Natural England Green Infrastructure Map](#)

Map 2 (Green Infrastructure Map (Source ANP SEA/ Natural England))

Therefore, my client objects to the blanket designation of green infrastructure proposed to cover such a large area to the North of Alton. The policy needs to be amended to reflect within the broad area covered there are areas that do not contribute to or meet the green infrastructure tests (as evidenced by the Alton Neighbourhood Plan Strategic Environment Assessment). Policy NBE12.1 is overly restrictive in protecting an unjustified green infrastructure to the north of Alton. Policy NBE12.1 and Figure 5.4 as currently drafted is therefore unsound and needs amending to remove a blanket designation.

### ***Policy H1: Housing Strategy***

#### *Duty to Cooperate*

The housing strategy set out in Policy H1 makes no assumption to meet the unmet needs of other neighbouring local planning authorities (except SDNPA). Instead, the approach suggests any dwellings surplus to the identified requirements could be attributed to any future unmet need.

Our client considers that East Hants should offer to assist with unmet needs from surrounding authorities where required. This should be regardless of scale and location. The NPPF is clear that plans should be positively prepared and where practical to do so meet the need from neighbouring boroughs. There is sufficient land availability within East Hants to deliver this unmet need. Therefore, there would need to be very compelling reasons to not meeting the unmet need from neighbouring authorities. Our client has a site in a sustainable location in Alton that is available, deliverable and viable for development.

#### *Housing Numbers*

The housing numbers in Policy H1 should be minimums. The NPPF is clear at paragraph 35 plans should be positively prepared which, "as a minimum seeks to meet the area's objectively assessed needs...". It is therefore important the housing numbers are minimums.

### ***Housing Allocations***

The assumptions within the Site Allocations section have some fundamental flaws.

Table 12.1 sets out the number of homes per settlement to be delivered. For Alton it includes a major allocation for 1000 homes at Neatham Manor Farm, as well as 150 homes at Brick Kiln Lane (ref ALT1), 90 homes at Land at Whotedown Lane (ref ALT4), 24 homes at Travis Perkins (ref ALT5). It states "*a significant proportion of the 700 homes that are proposed within Alton and outside of the strategic site proposal at Neatham Manor Farm will be identified through the Alton Neighbourhood Plan, which is in the process of being revised*". My client has a number of concerns with this approach.

#### *1. Reliance on Neatham Manor Farm*

The expectation that the majority (over 1,000 of the new homes) will be delivered at one allocation is unrealistic and carries a high risk of jeopardising the delivery of

sufficient new homes. This relies on the development progressing in a timely manner to ensure housing need is met. Given the complexities and risk of such a large scale construction project, it carries a greater risk of non-delivery than a larger number of allocated smaller - medium sized sites. The inherent risk of allocating such a high proportion of the new homes for the next 20 years, in one allocation is therefore a threat to the successful delivery of housing in Alton. To reduce this risk it is recommended additional sites are found and the capacity of Neatham Manor Farm is reduced in this plan cycle.

2. *Reliance of Alton Neighbourhood Plan to deliver Allocations for 700 homes*

The expectation that the Neighbourhood Plan will allocate sites for the remaining (approximately 436) new homes is unsound, and contrary to paragraph 67-69 of the NPPF. Whilst a Neighbourhood Plan is subject to independent examination, the examiner's role is limited to testing whether or not the plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act (1990) (as amended). The examiner is not testing the soundness of a neighbourhood plan or other material considerations. It is considered the site allocation process needs to be thoroughly and robustly examined (including for soundness), and the most appropriate place should therefore be through the East Hants Local Plan. A failure to allocate adequate sites within the East Hants Local Plan has a high potential to lead to a failure to meet the required housing needs.

It is inconsistent that 4 sites are allocated for housing in Alton, but there is an expectation further sites will be allocated through the Neighbourhood Plan. This therefore means different sites will be subject to differing levels of thoroughness and robustness of assessment.

Paragraph 69 of the NPPF is quite clear that strategic policy-making authorities "should... identify a sufficient supply and mix of sites..." for housing. Strategic policy-making authorities is defined in the glossary as "Those authorities responsible for producing strategic policies (local planning authorities, and elected Mayors or combined authorities, where this power has been conferred). This definition applies whether the authority is in the process of producing strategic policies or not".

It is therefore necessary to ensure consistency, fairness and soundness that the East Hants Local Plan allocates sufficient housing sites to meet the 1700 new homes target for Alton. If the Neighbourhood Plan then decides there is a need to allocate further housing, then these should be in addition to 1700 new homes already allocated through the Local Plan.

## **Allocation of Sites**

Appendix F of the East Hampshire Integrated Impact Assessment, provides a sustainability assessment of sites against 12 tests. This therefore forms an important objective assessment

of the sustainability of each site and should therefore inform the selection of designated sites for housing.

Upon review of the results, it is apparent that this assessment has not been accurately taken into account in deciding which sites should be allocated. When assessing the scores of our client's site against the allocated sites, our client's site ranks highest, as having the most positive impacts and least negative impacts. (This is set out in Table 1 that collates the numbers of different scores). The allocation at Neatham Manor Farm has the lowest score.

AL-005	Land at Brick Kiln and Basingstoke Road	+/-	+	-	-	++	++	?	++	-	-	-	-	-
BIN-010	Land at Neatham Manor	0	+	-	-	+/-	++	?	++	-	-	-	-	-
BIN-011	Land at Neatham Manor Farm	?	+	-	-	+/-	++	-	++	-	-	-	-	-
BIN-012	Land South of Fullers Road	+/-	+	-	-	+/-	0	0	0	-	-	-	-	-
CHA-009	Travis Perkins (Mounters Lodge part)	0	+	-	++	++	++	?	+	0	-	-	-	-
AL-029	Land west of Old Odiham Road	+/-	++	0	-	++	++	0	++	-	-	0	0	

Key to the High Level Assessment Matrix	
++	Significant positive effects likely
+	Minor positive effect likely
+/-	Mixed minor effects likely
-	Minor negative effects likely
-	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain
SIA Objectives	
1	To protect, enhance and restore biodiversity across the East Hampshire planning area.
2	To minimise carbon emissions and contribute to achieving net zero carbon emissions in the East Hampshire planning area.
3	To promote adaptation and resilience to climate change.
4	To promote accessibility and create well-integrated communities.
5	To actively promote health and wellbeing across East Hampshire and create safe communities free from crime.
6	To strengthen the local economy and provide accessible jobs and skills development opportunities for local residents.
7	To protect and enhance built and cultural heritage assets in the East Hampshire planning area.
8	To provide good quality and sustainable housing for all.
9	To conserve and enhance the character of the landscape and townscape.
10	To support efficient and sustainable use of East Hampshire's natural resources.
11	To achieve sustainable water resource management and protect and improve water quality in the East Hampshire planning area.
12	To minimise air, noise and light pollution in the East Hampshire planning area.

*Excerpts of allocated sites and Site AL029*

Sustainability Rank	Site	++	+	+/-	-	0	?
1	Land west of Old Odiham Road	4	0	1	3	0	4
2	Travis Perkins	3	2	0	1	3	2
3	Brick Kiln	3	1	1	3	3	0
4	Neatham Manor Farm	2	1	1	3	4	0

*Table 1 Sustainability Assessment of Allocated Sites vs ALO29*

This demonstrates that the selection of allocated sites is fundamentally flawed, unsound and it is not justified why higher scoring sustainable sites (such as AL029) have not been allocated.



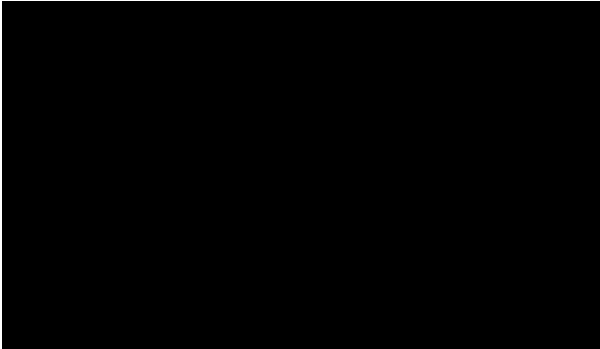
It is requested the site selection assessment is reviewed in relation to having specific regard to the IIA. This should then lead to inclusion of more sustainable sites, such as AL-029.

**Conclusion**

Our client, [REDACTED] welcomes the preparation of the New Local Plan, however has some significant concerns as set out in this letter.

We trust the matters raised can be addressed to ensure a sound Local Plan is prepared.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**Sent:** 07 March 2024 16:33  
**To:** [EHDC - Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** David Jarvis obo Rubix Land Ltd - East Hampshire Local Plan - Reg.18 Consultation  
**Attachments:** [3094 Rubix EHP Reps Reg 18 FINAL.060324.pdf](#)

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

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

Dear Sir/Madam,

On behalf of our clients, Rubix Land Ltd, please find attached representations to the Draft Local Plan (Regulation 18 Version).

Please acknowledge receipt of this email.

Best regards,

## DAVID JARVIS ASSOCIATES

David Jarvis Associates Limited 1 Tennyson Street Swindon SN1 5DT  
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**RUBIX LAND LTD**

**LAND AT SOUTH ALTON**

**REPRESENTATIONS TO EAST HAMPSHIRE DRAFT LOCAL PLAN (REG.18) CONSULTATION**

**7 March 2024**



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**CLIENT**                      Rubix Strategic Ltd

**PROJECT**                    Land at South Alton

**REPORT TITLE**            Representations to East Hampshire Draft Local Plan (Reg.18) Consultation

**DJA Reference:**            3094-3-5

**Report Number:**        T2

**Revision:**                FINAL

**Issue Date:**             7 March 2024

**REPORT REVISIONS**

Revision	Date	Description	Prepared	Approved
	07/03/2024	Final		

**CONTENTS:**

1. INTRODUCTION..... 4

2. RESPONSE TO REG.18 DRAFT CONSULTATION ..... 5

3. SUMMARY AND CONCLUSIONS.....12

**Appendices:**

- 1. Site Location Plan
- 2. Illustrative Framework plan
- 3. Transport Appraisal
- 4. Landscape and Visual Analysis
- 5. Phase 1 Drainage Strategy

## 1. INTRODUCTION

1.1 David Jarvis Associates (DJA) has been instructed by Rubix Land Limited (“Rubix”) (formally M7 Planning Limited) to prepare representations in response to the East Hampshire Draft Local Plan (Regulation 18) Consultation (EHDLP).

1.2 Rubix is promoting an area of land on the southern edge of Alton (‘Land at South Alton’), within the East Hampshire District Council (EHDC) area for a residential-led development of up to 800 dwellings (see site location plan at **Appendix 1**). The land, which is currently used primarily for agricultural purposes, extends to just under 50ha (123 acres) in area, with Windmill Lane running along its eastern edge, the A339 running along its western edge and the main A31 running along the southern boundary.

### Rubix Land Limited

1.3 Rubix Land Ltd is a sister company to M7 Planning Ltd and has taken over promotion of the Land at South Alton. Like M7, Rubix is a residentially focused land promoter and professional investor in land and property in the South of England.

1.4 Rubix has been working collaboratively with the various landowners associated with the land at South Alton and is solely responsible for promotion of the site.

### Background

1.5 As the Council is aware, the site indicated in **Appendix 1** has previously been submitted to the Council as part of the Land Availability Assessment (LAA) process.

1.6 Site ref LAA/AL-056 refers to a site of 52.54ha that is promoted for a mixed-use development incorporating approximately 650 dwellings. With regard to “suitability”, the LAA states:

*“Small part of site area TPO, site slopes from east to west, southern corner of the site in Flood zone 2 and 3, south eastern boundary surface water flooding, countryside character and landscape, noise impact from A31.”*

1.7 In addition, site references LAA/AL-013 (Land at Weysprings), LAA/AL-14 (Land at Weysprings Park) and LAA/AL-019 (Windmill House, Windmill Lane) are also contained within the LAA. The overall LAA conclusion is that the above sites are available, achievable and developable.

1.8 More recently, representations were made to the emerging Local Plan (Regulation 18 – Issues and Options) in January 2023, via M7 Planning. For information, LAA sites LAA/AL-013 and LAA/AL-019 are no longer included within the promotion site.

1.9 Since January 2023, Rubix have undertaken a significant amount of further assessment and survey work on the site, in order to bring forward a viable framework plan for a comprehensive strategic and sustainable urban extension on the edge of Alton (see **Appendix 2**). This includes key assessments relating to Highways, Landscape and Drainage; these assessments are attached as **Appendices 3, 4 and 5** and are discussed in more detail below.

## 2. RESPONSE TO REG.18 DRAFT CONSULTATION

### Policy S2 – Settlement Hierarchy

- 2.1 Rubix **supports** the designation of Alton as the principal (Tier 1) settlement within East Hampshire, which will accommodate a significant proportion of the housing and employment land requirement within the Local Plan period to 2040.
- 2.2 Rubix is promoting a strategic development site on Land at South Alton (see **Appendix 1**), which can accommodate a significant proportion of the housing quantum proposed for the settlement.

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

- 2.3 Rubix has some concerns over the wording of this policy. The preferred policy option would require all new development to be net-zero through a combination of removing fossil fuel energy use on site, setting energy use standards for all new dwellings of 35kwh/m2/year and space heating demand of less than 15kwh/m2/year, requiring the generation of renewable energy to meet energy demand, and use offsetting where for any residual energy demand that cannot be met through onsite renewable energy.
- 2.4 Whilst Rubix would agree with the Council that there is a need to act to reduce carbon emissions, they would disagree that this needs to be undertaken through the Local Plan given that the Future Homes Standard (FHS) is being taken forward to achieve the same goal. Delivering carbon-reduction improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and which can be rolled out at scale.
- 2.5 As such the Council will need to give consideration to how the requirements of proposed policy CLIM2 are consistent with the written ministerial statement (WMS) published on 13 December 2023. In this statement the housing minister notes that *“Compared to varied local standards, nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes”* and that local standards can *“add further costs to building new homes by adding complexity and undermining economies of scale”*.
- 2.6 The 2023 WMS goes on to state that any standard that goes *beyond* building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:
- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
  - The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).
- 2.7 Turning to the first bullet point, the Council will need to ensure the costs and deliverability of this policy are fully and robustly tested. Whilst the Council have undertaken some cost analysis in their Viability Assessment, the Council are still to test the cumulative impact of these and the other policies in the local plan.
- 2.8 Moving to the second bullet point, the approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is not Justified or Consistent with National Policy and is therefore unsound.

- 2.9 It should be noted that the Government have considered whether it is appropriate to use a delivered energy metric, such as the one being proposed by the Council, and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to adopt standards above those required by building regulations, this must be expressed as a percentage of the target emission rate.

### **Policy H1 – Housing Strategy**

- 2.10 Rubix broadly **supports** the Local Plan provision of 1,700 dwellings to be provided at the Tier 1 settlement of Alton. However, it is considered that the vast majority of this provision should be met through the designation of a larger strategic allocation (or allocations) within the Local Plan.
- 2.11 The emerging Local Plan strategy is for 1000 dwellings of the Alton requirement to be provided within a strategic allocation at Neatham Manor Farm, with the remaining 700 to be allocated at smaller sites within the Local Plan and via a Review of the Alton Neighbourhood Plan. Rubix has a number of concerns over the proposed Neatham Manor Farm allocation, which is discussed on more detail below. However, notwithstanding this, Rubix consider it inappropriate to rely on the Neighbourhood Plan to bring forward the substantial residual requirement. The Local Plan process is the most appropriate forum for considering potential large-scale strategic allocations.
- 2.12 Strategic allocations ensure that developments come forward in an appropriately phased manner, in line with associated infrastructure and community facility provision, which often comes hand-in-hand with the wider housing development depending on need. Smaller developments placed around Alton may put additional and undue pressure on existing infrastructure and community facilities in the town (e.g. schools).
- 2.13 Rubix is promoting a strategic site on Land at South Alton, which can accommodate in the region of 800 dwellings and which is within a sustainable location immediately adjoining the existing settlement. The illustrative Masterplan (**Appendix 2**) makes provision for a new Primary School and local centre, to be located within a central position at the heart of the development. The need for additional community facilities will be discussed with the local planning authority as the development evolves.

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

- 2.14 This policy advises that the Council will require all Market homes to meet part M4(2) building regulation standards, unless evidence indicates it is not feasible.
- 2.15 M4(2) is an optional requirement, with significant financial consequences beyond the mandatory M4(1). The wording in the consultation draft should reflect the building regulations of the time, rather than set its own ambition, which may consequently cause delays or viability issues for the delivery of housing.

### **Part 12 – Site Allocations - Alton**

- 2.16 Following on from Policy H1, the Alton strategy is to provide 1,700 dwellings over the Plan period. This consists of the proposed strategic allocation at Neatham Manor Farm (1000 dwellings approx.) with the remaining 700 provided through smaller allocations, both in the Local Plan and to come forward through a Review of the Neighbourhood Plan.
- 2.17 Rubix consider that this strategy is fundamentally unsound, being neither Justified or Effective, and it does not represent the most appropriate or sustainable strategy for the delivery of development at Alton. This is stated for the following reasons:



**Strategic Allocations**

2.18 As referred to above, Rubix consider that the most effective way of delivering the significant housing requirement for Alton is via strategic allocations within the Local Plan. Such allocations should be well-related to the existing built-up area of Alton, on sites that are relatively unconstrained, which can deliver appropriate infrastructure and community facilities.

**Neatham Manor Farm**

2.19 Rubix have significant concerns about the proposed allocation at Neatham Manor Farm and consider it to represent an inappropriate and unsustainable location for a “new neighbourhood”, particularly taking into account the viable alternative site that is available on land at South Alton. Rubix’ concerns can be summarised as follows:

- Deliverability – Rubix understands that the site is being promoted by the landowner(s) directly through an agent. There is no specific promoter or developer involved. This casts significant doubt over the deliverability of the development within the Local Plan period.
- Location – the site is divorced entirely from the existing built-up area of Alton by the major A31 road. It has a very poor relationship with Alton and would not represent a coherent expansion of the settlement.
- Reference is made to the development creating a “new neighbourhood”; however, the quantum of development proposed on the site is not sufficient to support the creation of a new community. To succeed as sustainable developments, new neighbourhoods or communities tend to require development in excess of 3,000 dwellings. At just 1,000 dwellings, Neatham Manor Farm will instead represent a poorly-located, isolated satellite suburb to Alton.
- The access arrangements for Neatham Manor Farm would involve a single entrance onto the existing A31 roundabout, with no secondary vehicular access available to the site. This is considered to represent an unacceptable highways solution for such a large development and produces a development that is effectively a large cul-de-sac.
- A separate pedestrian/cycle access is proposed, but this is via a convoluted link along a farm access track and through an industrial estate and does not represent an attractive option for residents of the new development. Policy ALT8 refers to a “...need to take advantage of opportunities to open up the existing bridge to pedestrians and cyclists.” This suggests that there is no certainty this access will be available; if this is the case, all pedestrians/cyclists will need to navigate the major A31 roundabout to gain access to Alton, which casts significant doubt over the accessibility of the site
- The Integrated Impact Assessment (IIA) prepared in support of the Local Plan has advised that development at Neatham Manor Farm would have a “**significant negative**” effect on landscape character. This compares poorly to alternative sites, in particular land south of Alton, where landscape character effect is considered to be only “**minor negative**”.

2.20 Indeed, turning in more detail to the IIA, a comparison exercise has been carried out between Neatham Manor Farm and the Land at South Alton. To provide a comparison, the various impacts have been given a points allocation, as follows:

?, 0 or +/- impact	0 points
+ impact	1 point

++ impact                      2 points  
 - impact                        -1 point  
 -- impact                       -2 points

2.21 Table 1 below shows the points total for each site and indicates that the Land South of Alton has fewer negative impacts overall.

OBJECTIVE	Neatham Manor Farm (Site: BIN-011)	Land at South Alton (Site: AL-056)
1 - Biodiversity	? (0)	? (0)
2 – Net-Zero	+ (1)	++ (2)
3 – climate change resilience	-- (-2)	-- (-2)
4 – promote accessibility	- (-1)	- (-1)
5 – promote health & well-being	+/- (0)	++ (2)
6 – strengthen local economy	++ (2)	+/- (0)
7 – heritage assets	- (-1)	? (0)
8 – sustainable housing	++ (2)	++ (2)
9 – landscape character	-- (-2)	- (-1)
10 – use of natural resources	-- (-2)	-- (-2)
11 – water resource management	-- (-2)	-- (-2)
12 – air/noise/light pollution	- (-1)	- (-1)
<b>TOTAL</b>	<b>-6</b>	<b>-3</b>

**Table 1 – Integrated Impact Assessment: Comparative Results**

2.22 Rubix would also question the IIA conclusions in relation to the sites, particularly with regard to Biodiversity, Accessibility and the Local Economy.

2.23 On Biodiversity, Neatham Manor Farm adjoins two Ancient Woodlands and a Priority Habitat; it could therefore be argued that impacts of development are likely to be at least “**minor negative**”. With regard to the Land at South Alton, there are no important habitats in or adjoining the site (the Watery Lane SINCR referred to in the IIA lies on the opposite side of the A31, some distance from the site) and given the proposed biodiversity improvements associated with the development, it is considered this should lead to a “**minor positive**” impact.

2.24 With regard to Accessibility, the IIA refers to this element as “*To promote accessibility and create well-integrated communities*”. Significant concerns have been raised elsewhere within these

representations about the location of the Neatham Manor Farm site; the position of this site divorced from Alton by the A31 indicates that it will not be possible to create a “well-integrated community” on this site. Conversely, the Land at South Alton can incorporate a series of pedestrian/cycle links to the existing built-up area, utilising existing ProW in places, whilst also providing a new vehicular access linking the A339 with Windmill Lane. Therefore, Rubix would agree that the accessibility score for Neatham Manor Farm should be “**minor negative**”, it is considered that the score for the Land at South Alton should be at least “**+/- mixed minor effects likely**”.

2.25 With regard to the Local Economy, the IIA site assessment table for Neatham Manor Farm give this site a ++ (significant positive) score, on the basis that the “*Site also proposed for allocation for mixed use although quantum of employment land unknown at this stage.*” The proposed Neatham Manor Farm allocation (Policy ALT8) does not include any employment land provision; therefore, it cannot be described as “mixed-use” and should not be given such a positive score. It is appreciated that there is an employment allocation close to the site (Policy ALT7 – Land at Lynch Hill) but this is not part of the site itself. Neatham Manor Farm should therefore achieve the same score as Land South of Alton, namely – “**+/- mixed minor effects likely**”.

2.26 Taking these points into account would given an overall score to each site of -9 (Neatham Manor Farm) and -1 (Land at South Alton) – see **Table 2** below. This strengthens the point that the most suitable and sustainable option for delivering the majority of Alton’s housing requirement should be a strategic allocation on the Rubix Land at South Alton.

OBJECTIVE	Neatham Manor Farm (Site: BIN-011)	Land at South Alton (Site: AL-056)
1 - Biodiversity	- (-1)	+ (1)
2 – Net-Zero	+ (1)	++ (2)
3 – climate change resilience	-- (-2)	-- (-2)
4 – promote accessibility	- (-1)	+/- (0)
5 – promote health & well-being	+/- (0)	++ (2)
6 – strengthen local economy	+/- (0)	+/- (0)
7 – heritage assets	- (-1)	? (0)
8 – sustainable housing	++ (2)	++ (2)
9 – landscape character	-- (-2)	- (-1)
10 – use of natural resources	-- (-2)	-- (-2)
11 – water resource management	-- (-2)	-- (-2)
12 – air/noise/light pollution	- (-1)	- (-1)
<b>TOTAL</b>	<b>-9</b>	<b>-1</b>

**Table 2 – Integrated Impact Assessment: Comparative Results (Rubix Analysis)**

***Land at South Alton***

- 2.27 At a recent meeting with Planning Policy representatives from the District Council, on 8<sup>th</sup> February 2024, Rubix were advised that one of the key reasons for the Council not considering Land at South Alton for allocation at this Regulation 18 stage, was the lack of information provided in relation to the site.
- 2.28 As advised above, Rubix is working collaboratively with the landowners for the Land at South Alton and so can confirm the site will be taken forward as a single promoted site for development as a strategic expansion to Alton. The site is therefore suitable, available and deliverable.
- 2.29 The revised Framework Plan provided at **Appendix 2** indicates that the site can deliver in the region of 800 dwellings with associated community facilities, public open space and landscaping. This Plan has been developed following detailed assessment of the site in relation to Highways, Landscape and Drainage impacts, which can be summarised as follows:

*Highways*

- 2.30 Rubix has commissioned Ashley Helme Associates (AHA) to produce an initial Transport Appraisal (TA – see **Appendix 3**) of the site, based on the provision of an internal spine road leading through the site from the A339 (Selborne Road) on the western boundary through to Windmill Lane/Wilsom Road on the eastern boundary, with the following access strategy:
- i. Roundabout junction on the A339 Selborne Road (2 design options)
  - ii. Priority Controlled junction on Windmill Lane and improvements to Wilsom Road junction
  - iii. Upgrade to the existing Public Rights of Way (PROW) to provide pedestrian and cycle access to the north of the Site.
- 2.31 This strategy is considered to be acceptable in highway design and safety terms, although the new vehicular access points will need to be subject to capacity testing and discussed in greater detail with the local highway authority. The access road would be suitable for use as an extension to existing local bus route(s), therefore increasing accessibility.
- 2.32 In summary, the appraisal has not identified any transportation issues that might prevent the Site from being developed to accommodate the proposed development.

*Landscape*

- 2.33 Development on the site has been the subject of an initial Landscape and Visual Analysis (LVA) by David Jarvis Associates (DJA). See **Appendix 4**.
- 2.34 In terms of visibility of the Site from the South Downs National Park, the LVA concludes that this is limited to oblique and heavily fragmented views from the B3006 to the south of Westbrook Grange. There is no intervisibility between the Site and the landscape within the National Park further to the south and to the west, owing to the sequential screening effect of trees and buildings.
- 2.35 Whilst there is some distant (and often oblique) visibility of the Site from the PROW crossing the higher landscape to the north-east and to the east, views of the Site are generally limited to localised parts of its higher, northern portion.
- 2.36 With a prescribed landscape strategy in place, which includes inherent mitigation of limiting the upper extent of development and providing a robust landscape buffer along the southern and south-

eastern edge of the Site, development of the Site could be assimilated successfully into the receiving landscape.

- 2.37 The LVA also agrees with the general conclusions of the IIA that the Neatham Manor Farm site would have a “strong negative” impact on landscape character. Therefore by comparison Land at South Alton performs better than Neatham Manor Farm.

#### *Drainage*

- 2.38 Most of the Land at South Alton is located within Flood Zone 1.
- 2.39 An initial drainage strategy has been undertaken by Quad Consult (**Appendix 5**) of the SW corner of the development site, being the most sensitive part of the site containing areas within Flood Zones 2 and 3. This area is to form Phase 1 of the wider development, including provision of the new vehicular access/roundabout onto the A339 Selborne Road.
- 2.40 The strategy advises that development should be limited to a specific zone within the phase 1 area (Zone 1). It is recommended that a detailed model be obtained from the Environment Agency (if available) so that flood levels can be plotted accurately, although it is advised that flood levels will never exceed that of the main highway, Selborne Road, which effectively would act as a spillway.
- 2.41 The construction of an access into the site will displace some flood water for the extreme events so this would be compensated for in the site itself. Surface water from the proposed development will be attenuated within the Zone 1 area of the site and discharged at an agreed rate into the existing watercourse. A volume approximately to 1900m<sup>3</sup> will be required assuming a 70% coverage of the Zone 1 developable area for a suggested discharge rate of 5l/s.
- 2.42 Surface water runoff will be conveyed overland for the proposed development wherever possible and be supported with the extensive use of SuDS features in accordance with the DCG.
- 2.43 Rubix is progressing modelling work and will continue to liaise with the council as this work is advanced.

### **3. SUMMARY AND CONCLUSIONS**

- 3.1 These representations have been prepared by David Jarvis Associates, on behalf of Rubix Land Ltd in response to the EHLP Reg.18 Draft.
- 3.2 Rubix are promoting Land at South Alton for housing development, on behalf of the landowners, and a formal promotion agreement is in place to this effect. The site is suitable, available and deliverable.
- 3.3 The site will incorporate:
- Up to 800 homes across a wide range of dwelling types and tenures to meet all housing needs including affordable housing;
  - Internal spine road linking the A339 (Selborne Road) with Windmill Lane/Wilsom Road
  - Open spaces and recreational areas;
  - Areas for biodiversity improvements
  - Community facilities including a local centre and primary school;
  - Cycle and pedestrian routes connecting the site to Alton.
- 3.4 These proposals will significantly assist the Council in meeting key objectives by delivering homes, sustainable and well connected growth. The Land at South Alton represents a significantly more sustainable and accessible alternative to the proposed allocation at Neatham Manor Farm and should be considered as a strategic allocation in its own right within the emerging Local Plan, either in conjunction with or as a replacement to this site.
- 3.5 Rubix would be pleased to continue liaising with EHDC regarding this important strategic opportunity, which will deliver much needed market and affordable housing whilst meeting the overall objectives of the EHLP.

**Appendix 1**  
**Site Location Plan**



Job. No | Drawing No. | Project

**RL 106**  
**Land off Windmill Lane, Alton**

Drawing Title  
**Site Boundary**

Date: 06/03/2024 Scale: NTS Drawn by: TF Rev: /



**Appendix 2**  
**Framework Plan**

- |  |                                 |   |  |   |                                       |   |  |   |                                 |
|--|---------------------------------|---|--|---|---------------------------------------|---|--|---|---------------------------------|
|   | 1. Access to Development        |   | 6. New primary School                            |   | 11. Pocket Parks                      |   | 16. Main Spine Road with Green Verges and Street Trees |   | 21. South Downs National Park   |
|  | 2. Low Density - Residential    |  | 7. New access roundabout                         |  | 12. Completed Residential Development |  | 17. Attenuation  |  | 22. Potential Formal Play Space |
|  | 3. Medium Density - Residential |  | 8. New Active Travel Route                       |  | 13. Borovere Business Park            |  | 18. Listed Buildings                                   |  | 23. Manageable Flood Risk       |
|  | 4. High Density - Residential   |  | 9. Greenlink/POS/Ecological Improvement Corridor |  | 14. Windmill Hill, Existing Parkland  |  | 19. Existing Public Rights of Way                      |  | 24. Sainsburys supermarket      |
|  | 5. Local Centre                 |  | 10. Biodiversity Opportunities                   |  | 15. Strategic Planting                |  | 20. New Footpath Link                                  |   |                                 |



Job. No|Drawing No.|Project  
**RL106|110**  
**Land off Windmill Lane, Alton**

Drawing Title  
**Framework Plan**

Date: March 2023 Rev: / Drawn by: TF



**Appendix 3**  
**Transport Appraisal**

**South Alton, Hampshire**

**TRANSPORT APPRAISAL**

Report prepared for  
Rubix Land

February 2023

Report Reference 1854/1



**HLEY HELME**  
CIATES



# Transport Appraisal

## South Alton, Hampshire

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Client: Rubix Land  
Report Ref: 1854/1  
Status: Draft  
Date: February 2024

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# Transport Appraisal

## South Alton Hampshire

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<b>Chapter</b>	<b>Page</b>
1. Introduction	1
2. Highway Network	2
3. Potential Access Strategy	4
4. Walk & Cycle	7
5. Public Transport	11
6. Generated Traffic	14
7. Summary & Conclusions	19

### **Figures**

1.1	Location Plan
4.1	Walk Isochrones
4.2	Public Rights of Way
3.3	Cycle Isochrones

### **Tables**

5.1	Bus Services & Frequencies
6.1	2011 Census Distribution

### **Drawings**

1854/03/A	Selborne Road Roundabout Option
1854/04	Windmill Lane
1854/05/A	Selborne Road Roundabout Option

### **Appendices**

A	TRICS Outputs
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# 1 Introduction

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1.1 Ashley Helme Associates Limited (AHA) are appointed by Rubix Land to prepare a Transport Appraisal report for a potential development at South Alton, Hampshire (henceforth referred to as the Site). The location of the Site is indicated on Figure 1.1, in the context of the local highway network.

## 1.2 Proposed Development

1.2.1 The Site is presently agricultural/field land, but could potentially accommodate a development of up to 800 dwellings, a primary school and local centre.

## 1.3 Scope of the Report

1.3.1 This report provides a transport appraisal of the Site in the context of the potential future development.

1.3.2 The local highway network is described in Chapter 2. The potential Access Strategy for the Site is outlined in Chapter 3.

1.3.3 An accessibility appraisal of the Site by non-car modes is presented in Chapters 4 (Walk & Cycle) and 5 (Public Transport), using an accessibility mapping methodology.

1.3.4 An estimation of the development generated traffic flows is presented in Chapter 6.

1.3.5 The conclusions of the report are presented in Chapter 7.



## 2 Highway Network

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- 2.1 The location of the Site is indicated on Figure 1.1 in the context of the local highway network.
- 2.2 The Site has frontage on the A339 Selborne Road and Windmill Lane. The A31 also runs along the Site southern boundary.

### 2.3 A339 Selborne Road

- 2.3.1 The A339 Selborne Road runs along the western boundary of the Site. The A339 is subject to the national speed limit (60mph) along most of the Site frontage, but this changes to a 30mph speed limit near the north boundary.
- 2.3.2 There is no footway on either side of A339 along the Site frontage. There is grass verge on the east side of the A339, which could be used to form a footway/cycleway in the future. There is also an absence of street lighting.
- 2.3.3 North of the Site, the A339 Selborne Road forms a roundabout junction with Winchester Road and Thistledown Way.
- 2.3.4 South of the Site, the A339 forms eastbound and westbound on/off-slip junctions with the A31. The A31 is a dual carriageway and forms part of the Strategic Road network. The A31 is subject to the national speed limit (70mph) in the vicinity of the Site.

### 2.4 Windmill Lane

- 2.4.1 The eastern boundary of the Site has frontage on Windmill Lane. Windmill Lane is subject to a 30mph speed limit in the vicinity of the Site, but this changes to a 40mph speed limit on the approach to the B3004 Wilsom Road.
- 2.4.2 Windmill Lane is circa 5.2m wide at present, with footway on the north side of the road. However, there is additional highway land at the back of this footway and on the south side of the carriageway that could be utilised for widening works. Windmill Lane narrows circa 100m west of the B3004 and the footway terminates.

### 2.5 Collision History

- 2.7.1 The website CrashMap has been used to review the latest five-year collision records for the A339 and Windmill Lane along the Site frontage.





## 2.7.2 A339 and A31 Slip Roads

2.7.2.1 There are no recorded collisions on the A339 along the Site frontage, but there are 3No recorded collisions in the vicinity of the eastbound A31 on/off-slips. There are also 4No recorded collisions on or in the vicinity of the westbound A31 on/off-slips.

2.7.2.2 A summary of the CrashMap collision data is set out below:

	2018	2019	2020	2021	2022	<b>TOTAL</b>
Eastbound	1	-	-	1	1	<b>3</b>
Westbound	1	-	1	1	1	<b>4</b>
<b>TOTAL</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>7.</b>

2.7.2.3 There are a total of 7 recorded collisions in the vicinity of the A31 on/off-slips. The severity of the recorded collisions is set out below:

	Slight	Serious	Fatal	<b>TOTAL</b>
Eastbound	2	1	-	<b>3</b>
Westbound	2	2	-	<b>4</b>
<b>TOTAL</b>	<b>4</b>	<b>3</b>	<b>0</b>	<b>7.</b>

2.7.2.4 Review of the above shows that 4 of the 7 collisions are slight with the remaining 3 classified as serious. No fatal collisions are recorded.

## 2.7.3 Windmill Lane

2.7.3.1 There have been 2No recorded collisions on Windmill Lane. The first collision occurred in 2020 circa 175m west of the B3004. The collision is classified as slight.

2.7.3.2 The second recorded collision occurred in 2022 at the junction with Wilsom Road. It is also classified as slight.

## 2.7.4 Conclusions

2.7.4.1 Review of the CrashMap data does not identify a collision cluster that would suggest there is an existing highway safety concern in the vicinity of the Site.



## 3 Potential Site Access Arrangements

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### 3.1 Site Access Strategy

3.1.1 A development of the scale proposed would benefit from more than one vehicular access point. Consequently, the following access strategy is proposed:

- (i) Roundabout junction on the A339 Selborn Road,
- (ii) Priority Controlled junction on Windmill Lane,
- (iii) Upgrade to the existing Public Rights of Way (PROW) to provide pedestrian and cycle access to the north of the Site.

### 3.2 Design Considerations

#### 3.2.1 Design Guidance

3.2.1.1 The design guidance considered includes Manual for Streets 1 (MfS1), MfS2 and the Design Manual for Roads and Bridges (DMRB).

#### 3.2.2 A339 Selborn Road

3.2.2.1 Drg Nos 1854/03/A and 1854/05/A present a potential roundabout junction on the A339 Selborne Road to serve the potential development.

3.2.2.2 Drg No 1854/03/A shows a scheme that maintains the existing arrangements at the A31 eastbound on/off-slips, except that the on-slip forming part of the new roundabout junction. The off-slip remains unchanged from the existing arrangements. A 45m diameter normal roundabout is shown, with segregated footway and cycleway on the north side of the A339 Selborne Road.

3.2.2.3 Drg No 1854/05/A also shows a roundabout junction on the A339, but in this scheme both the A31 on and off-slips are incorporated into the roundabout design. A 50m diameter roundabout is shown, with segregated footway and cycleway on the north side of the A339 Selborne Road.

3.2.2.4 It is considered that both options could be utilised to provide access into the development from the A339. These junctions would need to be discussed with the local highway authority and the strategic highway authority, National Highways. Capacity testing would also be needed to check these can suitably accommodate the existing and development generated traffic.



3.2.2.5 However, it is considered that both options are likely to offer a suitable means of access into the development.

### **3.2.3 Windmill Lane**

3.2.3.1 Drg No 1854/04 presents a potential access to the Site from Windmill Lane. Drg No 1854/04 shows the widening and realignment of Windmill Lane to take the road into the Site. The existing western part of Windmill Lane will then form a priority-controlled T-junction with the new access road. The Site access road and widened section of Windmill Lane is 6.5m in width, to allow bus penetration into the development.

3.2.3.2 The junctions would need to be discussed with the local highway authority. Capacity testing would also be needed to check the junction of Wilsom Road/Windmill Lane can suitably accommodate the existing and development generated traffic or whether this junction might need to be signalised. It may also be necessary to consider introducing restrictions on the existing narrow section of Windmill Lane to the west of the Site access.

### **3.2.4 Pedestrian & Cycle Access**

3.2.4.1 It is important that the Site has good pedestrian and cycle access. The roundabout junction options on the A339 both show segregated footway and cycleway on the north side of the A339. This will provide a link along the A339 to the existing facilities at the A339/Winchester Road/Thistledown Way junction.

3.2.4.2 The potential access on Windmill Lane includes footway on both sides of the new access road and this is shown on Drg No 1854/04.

3.2.4.3 In addition to the two vehicular access points, there are a number of Public Rights of Way (PROW) that could be upgraded to provide pedestrian and cycle access points. These include links to the following roads:

- (i) Borovere Lane,
- (ii) The Ridgeway,
- (iii) Salisbury Close.

3.2.4.4 These PROW could be used to provide more direct footway and cycleway links to the north of the Site. These PROW are shown on Figure 4.2 and are discussed further in Chapter 4.

### **3.2.5 Public Transport Access**

3.2.5.1 A scheme of the size proposed would need to have good public transport accessibility. This is likely to involve bring a bus service into the Site. Both vehicular access points into the Site have



been designed to accommodate bus services, so there should be no reason why a bus service could not come into the development.

### **3.3 Summary**

- 3.3.1 The potential for accessing a development of circa 800 dwellings, a primary school and local centre have been considered. A potential roundabout scheme (two options) has been identified to serve the development from the A339. A priority-controlled junction has been identified on Windmill Lane that could also potentially serve the Site.
- 3.3.2 Both access junctions would need capacity testing, but at this stage, there does not appear to be any reason why these two junctions could not serve the potential development.
- 3.3.3 The potential to provide suitable pedestrian and cycle links has also been considered. The access point on the A339 could include pedestrian and cycle links. The access on Windmill Lane shows footways on both sides of the access road. There are also existing PROW that could potentially be upgraded to provide more direct pedestrian and cycle links to the north of the Site.
- 3.3.4 The Site should also be accessible by public transport, with bus penetration of the Site available from both vehicular access points.



## 4 Walk & Cycle

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### 4.1 Walk

4.1.1 It is established and acknowledged that walking is the most important mode of travel at the local level, and offers the greatest potential to replace short car trips, particularly under 2km.

#### 4.1.2 National Travel Survey

4.1.2.1 The National Travel Survey of 2022 (NTS 2022) confirms that **31%** of all trips are undertaken on foot. For trips up to **1 mile** (1.6km), **83%** of journeys are carried out on foot.

4.1.2.2 The NTS also sets out that, on average, people:

- (i) undertake 267 walk trips per year,
- (ii) walk a total of 221 miles per year,
- (iii) spend 18 minutes walking per trip.

Based on the total walk distance of 221 miles and 267 trips per year, this means that the average walk trip is about 0.8 miles (circa 1.3km).

4.1.2.3 The NTS establishes that:

- (i) 83% of all trips under 1 mile (1.6km) are made by foot,
- (ii) Nearly all walks recorded in the NTS were under 5 miles (99.8%),
- (iii) Walking accounts for 31% of all trips and 4% of distance travelled,
- (iv) 53% of trips to and from school were made by walking, by children aged 5-10 and 41% of trips to and from school were by foot for children aged 11-16,
- (v) Most trips to/from school for a trip length of under 1 mile were made by walking (86% for children aged 5-10 and 90% for children aged 11-16).

#### 4.1.3 Manual for Streets

4.1.3.1 The 'walkable neighbourhood' concept is set out in MfS1 and endorsed in MfS2. MfS1 explains that:

*"Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access*



comfortably on foot. However, this is **not an upper limit** and PPG13 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km." (MfS para 4.4.1, AHA emphasis)

#### 4.1.4 Walk Isochrones and Local Amenities

4.1.4.1 The CIHT provides guidance about journeys on foot. It does not provide a definitive view of distances, but does suggest a preferred maximum distance of 2000m for walk commuting trips. A 400m distance corresponds to a walk time of 5 minutes, based upon a typical normal walking speed. Figure 5.1 presents the development 400m, 800m, 1200m, 1600m and 2000m walk isochrones, (ie reflecting 5, 10, 15, 20 and 25-minute walk journeys), and taking account of the pedestrian infrastructure.

4.1.4.2 The walk isochrones presented in Figure 4.1 are created using Basemap TRACC software, a digital mapping and transport data program. The TRACC software enables installation of maps to create a road network. Amendments have been made to the road network to allow for the inclusion of public rights of way and pedestrian access points.

4.1.4.3 The TRACC software adopts the Department for Transport speeds and hence, a walk speed of 4.8km/h is automatically assumed across the road network.

4.1.4.4 Indicated on Figure 4.1 are examples of local facilities near to the Site. Figure 4.1 shows that the centre of Alton is within a circa 1600m walk of the Site. This provides access to a number of amenities including:

- Health: Pharmacy, Dental Surgery, Health Centre, Opticians,
- Shopping: Supermarkets,
- Leisure: Food Outlets, Playgrounds, Public Houses, Hair Salons, Sports Facilities
- Community: Library, Community Centre,

4.1.4.5 There are also additional amenities beyond a 1600m walk, but within a 2000m walk distance, including primary schools and a secondary school.

4.1.4.6 It should also be noted that the development would include a primary school and a local centre and residents of the Site would be within 800m of these facilities.

4.1.4.7 It is demonstrated that there are a range of amenities shown on Figure 4.1 that are accessible from the Site by foot. In addition to these, the Site will also benefit from a primary school and a local centre, both of which will be within 800m of the residents if located centrally.



#### **4.1.5 Public Rights of Way**

4.1.5.1 Figure 3.2 presents the existing Public Rights of Way (PROW) near to the Site. There are a number of existing PROW that pass through the Site, including:

- (i) 48/1,
- (ii) 49a/1 & 49a/2,
- (iii) 50c/2, 50c/3 & 50c/4,
- (iv) 53/1 & 53/2
- (v) 58/1.

4.1.5.2 Some of the existing PROW set out above provide links to the residential areas to the north of the Site and will provide opportunity for residents to walk to and from the centre of Alton along reasonably direct routes. These PROW could be upgraded as part of the development to provide good pedestrian and cycle access to the Site.

## **4.2 Cycle**

### **4.2.1 National Travel Survey (2022)**

4.2.1.1 The NTS 2022 sets out that, on average, people:

- (i) undertake 15 cycle trips per year,
- (ii) cycle a total of 57 miles per year,
- (iii) spend 24 minutes cycling per trip.

Based on the total cycle distance of 57 miles and 15 trips per year, this means that the average cycle trip is 3.8 miles, which is just over 6km.

### **4.2.2 Cycle Isochrones and Local Amenities**

4.2.2.1 It is recognised that cycling also has potential to substitute for short car trips, particularly those under 5km, and to form part of a longer journey by public transport.

4.2.2.2 Gear Change, A Bold Vision for Cycling and Walking (DfT, 2020) states:

*“58% of car journeys in 2018 were under 5 miles. And in urban areas, more than 40% of journeys were under 2 miles in 2017-18. For many people, these journeys are perfectly suited to cycling*





*and walking."* (Page 11)

- 4.2.2.3 The cycle isochrones presented in Figure 4.3 were created using Basemap TRACC software.
- 4.2.2.4 Figure 4.3 indicates the 2km and 5km cycle isochrones for the Site. Review of Figure 4.3 highlights that Alton Town Centre is within a circa 2km cycle ride. Holyborne, East Worldham, Chawton and Beech are within a 5km cycle ride of the Site.
- 4.2.2.5 As set out in Chapter 3, it appears feasible to introduce a link on the north side of the A339 to provide a link between the Site and the existing facilities in the vicinity of the A339/Winchester Road roundabout junction. It also appears feasible to upgrade some of the existing PROW that run through the Site to improve cycle access to the residential areas immediately north of the Site.

### **4.3 Summary**

- 4.3.1 It is necessary to ensure that the development of the Site includes good pedestrian and cycle links to the surrounding area. Encouraging walk and cycle journeys is recognised as important and the location of the Site provides a good context for journeys of residents to be undertaken on foot and by cycle. There are also opportunities to improve the existing walk and cycle infrastructure between the Site and nearby amenities, thereby offering opportunity to foster a sustainable community, in accordance with the aims of local policies and national policy in NPPF.



## 5 Public Transport

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5.1 The proposed development affords opportunity for development generated public transport journeys to be made by bus.

### 5.2 Bus

#### 5.2.1 Existing Bus Stops

5.2.1.1 Figure 4.1 identifies the location of the nearest bus stops in the vicinity of the Site. There are two bus stops on Wilsom Road that are within an 800m walk of the Site. However, it does not appear that these stops are currently served by a commercial service.

5.2.1.2 There are also bus stops on Draymans Way close to the Sainsbury's store that are around a 1200m walk of the Site. There are also stops on High Street that are within a 1600m walk of the Site.

#### 5.2.2 Bus Services & Frequencies

5.2.2.1 Table 5.1 summarises the scheduled bus services that call at the stops on Draymans Way and High Street. The No 64 bus service calls at the stop outside Sainsbury's for journeys from Alton to Winchester, but for return journeys passengers will need to use the stop on high street. The 64 has a frequency of 30 minutes during the day Monday to Sunday and every 60 minutes in the evening.

5.2.2.2 The first and last journeys from Winchester and Alton are set out below:

Day	Winchester		Alton	
	First	Last	First	Last
Monday to Friday	0620	2220	0633	2215
Saturday	0710	2320	0720	2315
Sunday	0720	1920	0715	2015.

5.2.2.3 The typical journey time between Winchester and Alton is circa 45-50 minutes.

5.2.2.4 The 13 bus service operates between Whitehill and Basingstoke and also calls at Alton. The 13 bus service has a 60 minute frequency on Mondays to Saturdays.

Day	Basingstoke		Alton	
	First	Last	First	Last
Monday to Saturday	0615	1950	0625	2000.



5.2.2.5 In addition to the 13 and 64 services, there are a number of other bus services that undertake a few trips to a variety of destinations including a number of colleges. These are set out in Table 5.1.

5.2.2.6 A development of this scale could potentially accommodate a new or extended bus service that comes into the Site. The identified access options have been designed to allow bus penetration and the development spine road would link Windmill Lane to the A339, which may make a service diversion more attractive or feasible. Therefore, it is considered that there is potential to improve the bus accessibility as part of the development of the Site.

### 5.3 RAIL

5.3.1 Alton railway station is within a 2km walk of the Site. Alton railway station is located on the Alton line and is operated by South Western Railway. The Alton line runs between Alton and Brookwood, with the latter being on the South Western Main Line.

5.3.2 There is a 30 minute service to London Waterloo on Mondays to Saturdays and an hourly service on Sundays. The destinations, frequency and typical journey times for services from Alton station, without needing to change trains, are set out below:

Destination	Frequency (per hour)	Journey Time
Aldershot	2	20 min
Farnham	2	12 min
Clapham Junction	1	65 min
Woking	1	40 min
London Waterloo	2	70 min

5.3.3 In additional destinations on the South West main line are available, such as Winchester, Basingstoke and Southampton Central, but these will require passengers to change train services.

### 6.3 Summary

6.3.1 There are existing public transport opportunities within walking distance of the Site.

6.3.2 There are existing bus stops to the west of the Site close to the Sainsbury's supermarket and on High Street. There is also the potential to provide a bus service that can enter the Site to bring residents within a short walk distance of a bus service.



6.3.3 Alton railway station is within a 2km walk of the Site. Alton railway station is located on the Alton line and is operated by South Western Railway. It provides opportunity to travel to a number of destinations and provides a half hourly service to London Waterloo.



## 6 Generated Traffic

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### 6.1 Peak Periods

6.1.1 The times when the combination is greatest, of traffic generated by the potential development and the existing highway network traffic, are the weekday AM & PM peak hours.

### 6.2 Generated Traffic

#### 6.2.1 % Distribution: Residential

6.2.1.1 The distribution of the traffic generated by the residential element of the development has been reviewed based on an interrogation of the 2011 Census Data, which is summarised in Table 6.1.

6.2.1.3 Review of Table 6.1 shows that the residential traffic is likely to split 75%/25% in favour of the Roundabout junction. With around a third of the traffic using the A31 and about a quarter using the A339.

#### 6.2.2 Generated Traffic: Residential

6.2.2.1 The TRICS database is interrogated to identify suitable trip generation rates to adopt for estimating the AM and PM peak hour traffic generated by a residential development of 800 dwellings.

6.2.2.2 TRICS is interrogated for information about trip generation rates for Houses. Criteria adopted for this interrogation include:

- Houses privately owned;
- Sites between 514-1146 units;
- All surveys 2015 or more recent;
- Sites in Ireland, Northern Ireland and Greater London excluded on the basis that they may have significantly different travel characteristics;
- If a site has multiple survey date entries, include only the most recent survey used within the identified TRICS sample, (to avoid statistical bias in the trip rates identified for use in the analysis),
- Town centre and edge of town centre sites manually removed.



6.2.2.3 On this basis, six sites are identified and the results of the TRICS interrogation are included in Appendix A. TRICS suggests that the 85%ile statistic is not reliable for a database with less than 20 entries. Thus, average trip rates are adopted to estimate the traffic generated by the proposed residential development. A copy of the TRICS Data is included in Appendix A.

6.2.2.4 The AM and PM peak hour vehicular trip rates based on the above TRICS interrogation are:

	ARR	DEP	2-WAY
AM (0800-0900)	0.163	0.395	0.558
PM (1700-1800)	0.350	0.169	0.519.

6.2.2.5 The consequent estimate of traffic (in vehicles) generated by the potential residential development of up to 800 dwellings in the AM and PM peak hours is:

	ARR	DEP	2-WAY
AM	130	316	446
PM	280	135	415.

### 6.2.3 Generated Traffic: Primary School

6.2.3.1 The TRICS database is interrogated to identify suitable trip generation rates to adopt for estimating the AM and PM peak hour traffic generated by the primary school.

- Primary School;
- Sites between 126-245 pupils;
- All surveys 2015 or more recent;
- Sites in Ireland, Northern Ireland and Greater London excluded on the basis that they may have significantly different travel characteristics;
- If a site has multiple survey date entries, include only the most recent survey used within the identified TRICS sample, (to avoid statistical bias in the trip rates identified for use in the analysis),
- Town centre and edge of town centre sites manually removed.

6.2.3.2 On this basis, six sites are identified and the results of the TRICS interrogation are included in Appendix A. TRICS suggests that the 85%ile statistic is not reliable for a database with less than 20 entries. Thus, average trip rates are adopted to estimate the traffic generated by the proposed residential development. A copy of the TRICS Data is included in Appendix A.

6.2.3.3 The AM and PM peak hour vehicular trip rates based on the above TRICS interrogation are:



PEAK HOUR	ARR	DEP	2-WAY
AM (0800-0900)	0.459	0.322	0.781
PM (1700-1800)	0.005	0.021	0.026.

6.2.3.4 The consequent estimate of traffic (in vehicles) generated by the primary school, assuming a single form entry of 210 pupils in the AM and PM peak hours is:

	ARR	DEP	2-WAY
AM	96	68	164
PM	1	4	5.

#### 6.2.4 Generated Traffic: Local Centre

6.2.4.1 The local centre will primarily serve the residents on the Site and it is unlikely that this use will generate significant external movements in the AM and PM peak hour, unless these are part of another trip purpose, such as commuting (ie residents call at the shops on their way to or from their place of work). Consequently, it is considered that the Local Centre is unlikely to generate any significant traffic in the AM and PM peak hours.

#### 6.2.5 Internalisation of Trips

6.2.5.1 Some of the trips generated by the residential units will be trips to/from the primary school that will be built on the Site. Similarly, some of the trips generated by the primary school will be generated by the residential use on the Site. Therefore, it is necessary to adjust the traffic estimates to avoid double counting.

6.2.5.2 The National Travel Survey 2022 provide information on Journey purpose by time of day. For the AM period 0700-0859 and the PM period 1600-1759, the journey purpose percentages are set out below:

TRIP PURPOSE	AM	PM
Commuting/Business	33%	28%
Education/Escort education	38%	9%
Shopping	3%	13%
Personal Business	13%	19%
Leisure/Other	13%	31%
Total	100%	100%



6.2.5.3 Adopting these journey purposes for the residential development and assuming that the trips to/from the new primary school trips account for 40% of the education trips, the development of 800 dwellings would generate the following internalised primary school trips in the AM peak hour:

PEAK HOUR	ARR	DEP	2-WAY
AM	20	48	68.

6.2.5.4 The primary school trips generated in the PM peak hour are likely to occur outside of the typical PM peak hour, so no reduction is made to the PM peak hour trips.

### 6.2.6 Net Traffic Impact

6.2.6.1 The estimate of the net traffic impact of the potential development is set out below:

USE	AM PEAK HOUR		PM PEAK HOUR	
	ARR	DEP	ARR	DEP
Residential	110	268	280	135
Primary School	48	48	1	4
<b>Total Traffic</b>	<b>158</b>	<b>316</b>	<b>281</b>	<b>139.</b>

6.2.6.2 Review of the above shows that the potential development of the Site could generate circa 474 trips in the AM peak hour and 420 trips in the PM peak hour.

6.2.6.3 As set out in Chapter 3, two access points have been identified and this would allow the above external traffic to be spread over the local highway network, though the census data indicates that the roundabout junction on the A339 may accommodate around 75% of the residential traffic.

6.2.6.4 Capacity testing would be required, to determine whether any mitigation is needed and it is considered that the following junctions would need to be assessed:

REF	JUNCTION	CONTROL
SJ1	Site Access/A339/A31 on-slip	Roundabout
SJ2	Site Access/Windmill Lane	Priority control,
SJ3	A31 eastbound off-slip/A339	Priority control,
SJ4	A31 westbound on/off-slips	Priority control,
SJ5	A31/A32 Gosport Road	Roundabout,
SJ6	A31/B3004 Montecchio Way	Roundabout,





SJ7	A339/Winchester Road	Roundabout,
SJ8	A339/Butts Road	Roundabout,
SJ9	A339/B3349 Basingstoke Road	Priority control,
SJ10	Draymans Way/High Street	Priority control,
SJ11	Draymans Way/Sainsbury's Access	Mini-roundabout,
SJ12	Draymans Way/Lower Turk Street	Mini-roundabout.

6.2.6.5 Traffic count data for the above junctions will need to be obtained and capacity testing of these junctions will be needed to support any planning application. However, at this stage there is no identified reason why the local highway network could not support the potential development of 800 dwellings, a primary school and a local centre at the Site.



## 7 Summary & Conclusions

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7.1 Ashley Helme Associates Limited (AHA) are appointed by Rubix Land to prepare a Transport Appraisal report for a potential development at South Alton, Hampshire.

7.2 The Site is presently agricultural/field land, but could potentially accommodate a development of up to 800 dwellings, a primary school and local centre.

7.3 This report provides a transport appraisal of the Site in the context of the potential future development.

### 7.4 Access Strategy

7.4.1 The potential for accessing a development of circa 800 dwellings, a primary school and local centre have been considered. A potential roundabout scheme (two options) has been identified to serve the development from the A339. A priority-controlled junction has been identified on Windmill Lane that could also potentially serve the Site.

7.4.2 Both access junctions would need capacity testing, but at this stage, there does not appear to be any reason why these two junctions could not serve the potential development.

7.4.3 The potential to provide suitable pedestrian and cycle links has also been considered. The access point on the A339 could include pedestrian and cycle links. The access on Windmill Lane shows footways on both sides of the access road. There are also existing PROW that could potentially be upgraded to provide more direct pedestrian and cycle links to the north of the Site.

7.4.4 The Site should also be accessible by public transport, with bus penetration of the Site available from both vehicular access points.

### 7.5 Walk and Cycle

7.5.1 Indicated on Figure 4.1 are examples of local facilities near to the Site. Figure 4.1 shows that the centre of Alton is within a circa 1600m walk of the Site. This provides access to a number of amenities including:

- Health: Pharmacy, Dental Surgery, Health Centre, Opticians,
- Shopping: Supermarkets,
- Leisure: Food Outlets, Playgrounds, Public Houses, Hair Salons, Sports Facilities
- Community: Library, Community Centre,



- 7.5.2 There are also additional amenities beyond a 1600m walk, but within a 2000m walk distance, including primary schools and a secondary school.
- 7.5.3 It should also be noted that the development would include a primary school and a local centre and residents of the Site would be within 800m of these facilities.
- 7.5.4 Figure 4.3 indicates the 2km and 5km cycle isochrones for the Site. Review of Figure 4.3 highlights that Alton Town Centre is within a circa 2km cycle ride. Holyborne, East Worldham, Chawton and Beech are within a 5km cycle ride of the Site.
- 7.5.5 It appears feasible to introduce a link on the north side of the A339 to provide a link between the Site and the existing facilities in the vicinity of the A339/Winchester Road roundabout junction. It also appears feasible to upgrade some of the existing PROW that run through the Site to improve cycle access to the residential areas immediately north of the Site.
- 7.5.6 There are a range of amenities that are accessible from the Site by foot and by cycle. In addition to these, the Site will also benefit from a primary school and a local centre, both of which will be within 800m of the residents if located centrally.

## **7.6 Public Transport**

- 7.6.1 There are existing bus stops to the west of the Site close to the Sainsbury's supermarket and on High Street. The 13 and 64 bus services operate with a 60 minute and 30 minute frequency respectively. There are also addition services that operate a few trips each day.
- 7.6.2 A development of this scale could potentially accommodate a new or extended bus service that comes into the Site. The identified access options have been designed to allow bus penetration and the development spine road would link Windmill Lane to the A339, which may make a service diversion more attractive or feasible. Therefore, it is considered that there is potential to improve the bus accessibility as part of the development of the Site.
- 7.6.3 Alton railway station is within a 2km walk of the Site. Alton railway station is located on the Alton line and is operated by South Western Railway. It provides opportunity to travel to a number of destinations and provides a half hourly service to London Waterloo.

## **7.7 Generated Traffic**

- 7.7.1 The potential development could comprise 800 dwellings, a primary school and a local centre. The estimate of the net traffic impact of the potential development in the AM and PM peak hours is set out below:



USE	AM PEAK HOUR		PM PEAK HOUR	
	ARR	DEP	ARR	DEP
Residential	110	268	280	135
Primary School	48	48	1	4
<b>Total Traffic</b>	<b>158</b>	<b>316</b>	<b>281</b>	<b>139.</b>

7.7.2 Review of the above shows that the potential development of the Site could generate circa 474 trips in the AM peak hour and 420 trips in the PM peak hour.

7.7.3 As set out in Chapter 3, two access points at the eastern and western ends of the Site have been identified and this would allow the above external traffic to be spread over the local highway network, though the census data suggests 75% of traffic may use the roundabout junction on the A339.

7.7.4 Capacity testing would be required, to determine whether any mitigation is needed and it is considered that the following junctions would need to be assessed:

REF	JUNCTION	CONTROL
SJ1	Site Access/A339/A31 on-slip	Roundabout
SJ2	Site Access/Windmill Lane	Priority control,
SJ3	A31 eastbound off-slip/A339	Priority control,
SJ4	A31 westbound on/off-slips	Priority control,
SJ5	A31/A32 Gosport Road	Roundabout,
SJ6	A31/B3004 Montecchio Way	Roundabout,
SJ7	A339/Winchester Road	Roundabout,
SJ8	A339/Butts Road	Roundabout,
SJ9	A339/B3349 Basingstoke Road	Priority control,
SJ10	Draymans Way/High Street	Priority control,
SJ11	Draymans Way/Sainsbury's Access	Mini-roundabout,
SJ12	Draymans Way/Lower Turk Street	Mini-roundabout.

7.7.5 Traffic count data for the above junctions will be required and capacity testing of these junctions will be needed to support any planning application. However, at this stage there is no identified reason why the local highway network could not support the potential development of 800 dwellings, a primary school and a local centre at the Site.

## 7.8 Summary

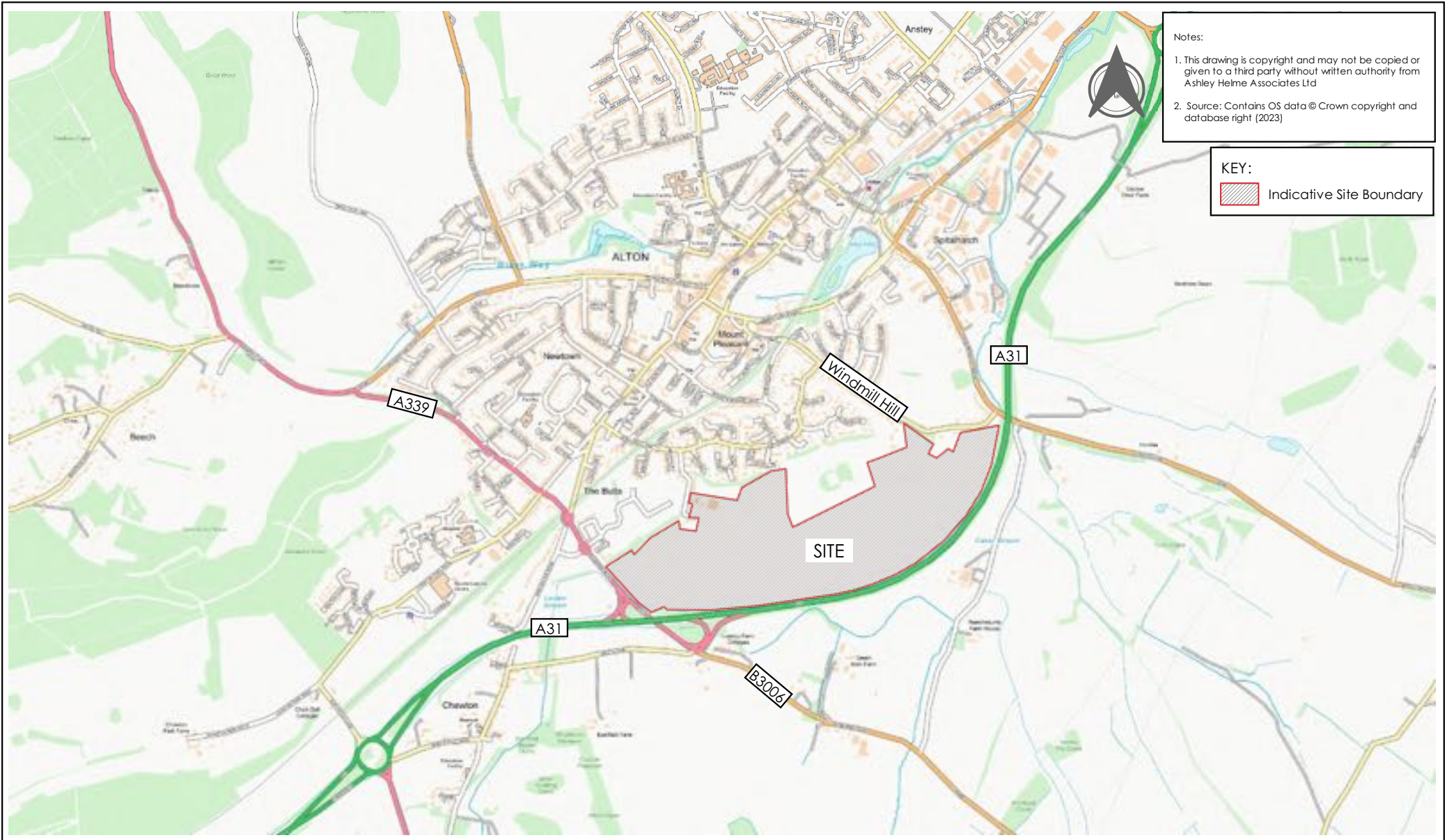
7.8.1 The Site is presently agricultural/field land, but could potentially accommodate a development of up to 800 dwellings, a primary school and local centre.



- 7.8.2 A transport appraisal of the Site in the context of the potential future development has been undertaken. It appears feasible to provide access to the Site via the A339 and Windmill Lane. Additional pedestrian and cycle links can be provided to the north via a number of existing PROW that could be upgraded as part of the development of the Site.
- 7.8.3 The centre of Alton is within a practical walk and cycle distance of the Site and there are numerous amenities located there. The development will include a local centre and primary school which will be within 800m of the residents.
- 7.8.4 There are existing bus stops to the west of the Site close to the Sainsbury's supermarket and on High Street. There is also the potential to provide a bus service that can enter the Site to bring residents within a short walk distance of a bus service. Alton railway station is within a 2km walk of the Site. It provides opportunity to travel to a number of destinations and provides a half hourly service to London Waterloo.
- 7.8.5 A more detailed transport assessment will be required to support any planning application, but this appraisal has not identified any transportation issues that might prevent the Site from being developed to accommodate 800 dwellings, a primary school and a local centre.

## Figures

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Notes:

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2. Source: Contains OS data © Crown copyright and database right (2023)

KEY:

 Indicative Site Boundary

Project:  
ALTON, HAMPSHIRE

Title:  
LOCATION PLAN

FIGURE 1.1

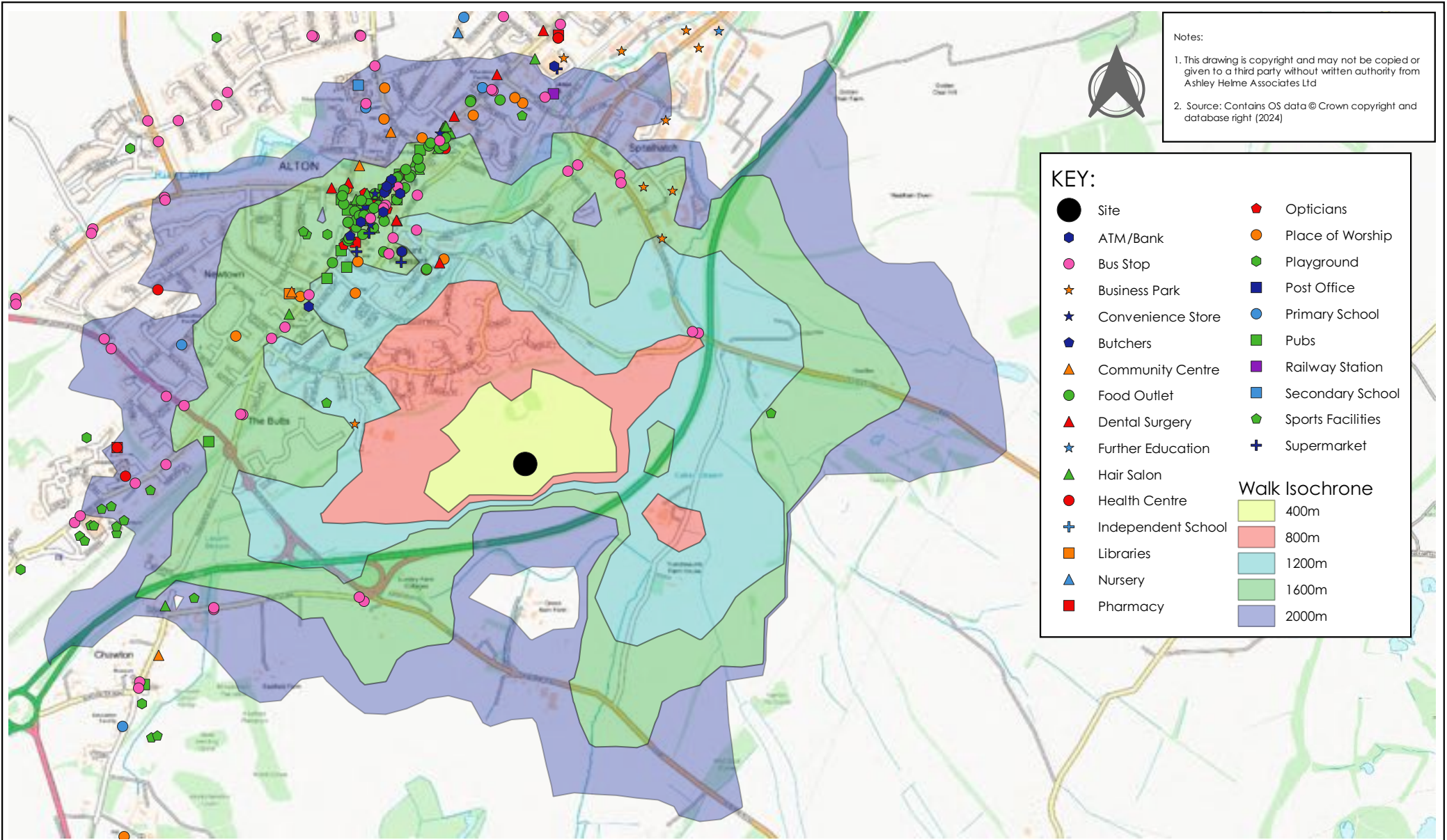
Client:  
RUBIX LAND

Date:  
FEBRUARY 2024

Scale:  
NTS







Notes:

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**KEY:**

● Site	◆ Opticians
◆ ATM/Bank	● Place of Worship
● Bus Stop	● Playground
★ Business Park	■ Post Office
★ Convenience Store	● Primary School
◆ Butchers	■ Pubs
▲ Community Centre	■ Railway Station
● Food Outlet	■ Secondary School
▲ Dental Surgery	◆ Sports Facilities
★ Further Education	⊕ Supermarket
▲ Hair Salon	
● Health Centre	<b>Walk Isochrone</b>
⊕ Independent School	■ 400m
■ Libraries	■ 800m
▲ Nursery	■ 1200m
■ Pharmacy	■ 1600m
	■ 2000m

Project:  
ALTON, HAMPSHIRE

Title:  
WALK ISOCHRONES AND AMENITIES

FIGURE 4.1

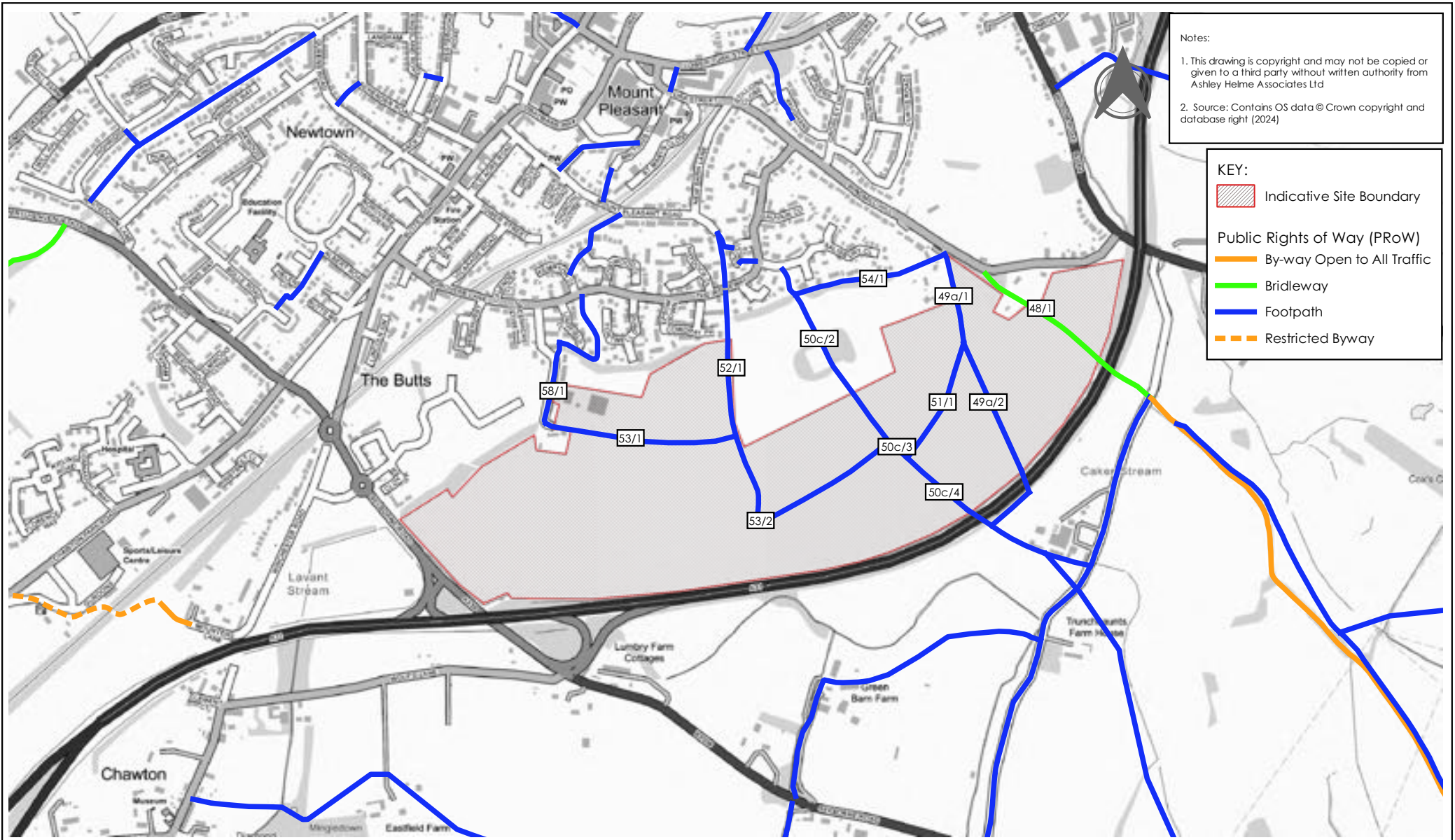
Client:  
RUBIX LAND

Date:  
FEBRUARY 2024

Scale:  
NTS












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**KEY:**

-  Indicative Site Boundary
- Public Rights of Way (PROW)**
-  By-way Open to All Traffic
-  Bridleway
-  Footpath
-  Restricted Byway

Project:  
ALTON, HAMPSHIRE

---

Client:  
RUBIX LAND

Title:  
PUBLIC RIGHTS OF WAY (PROW)

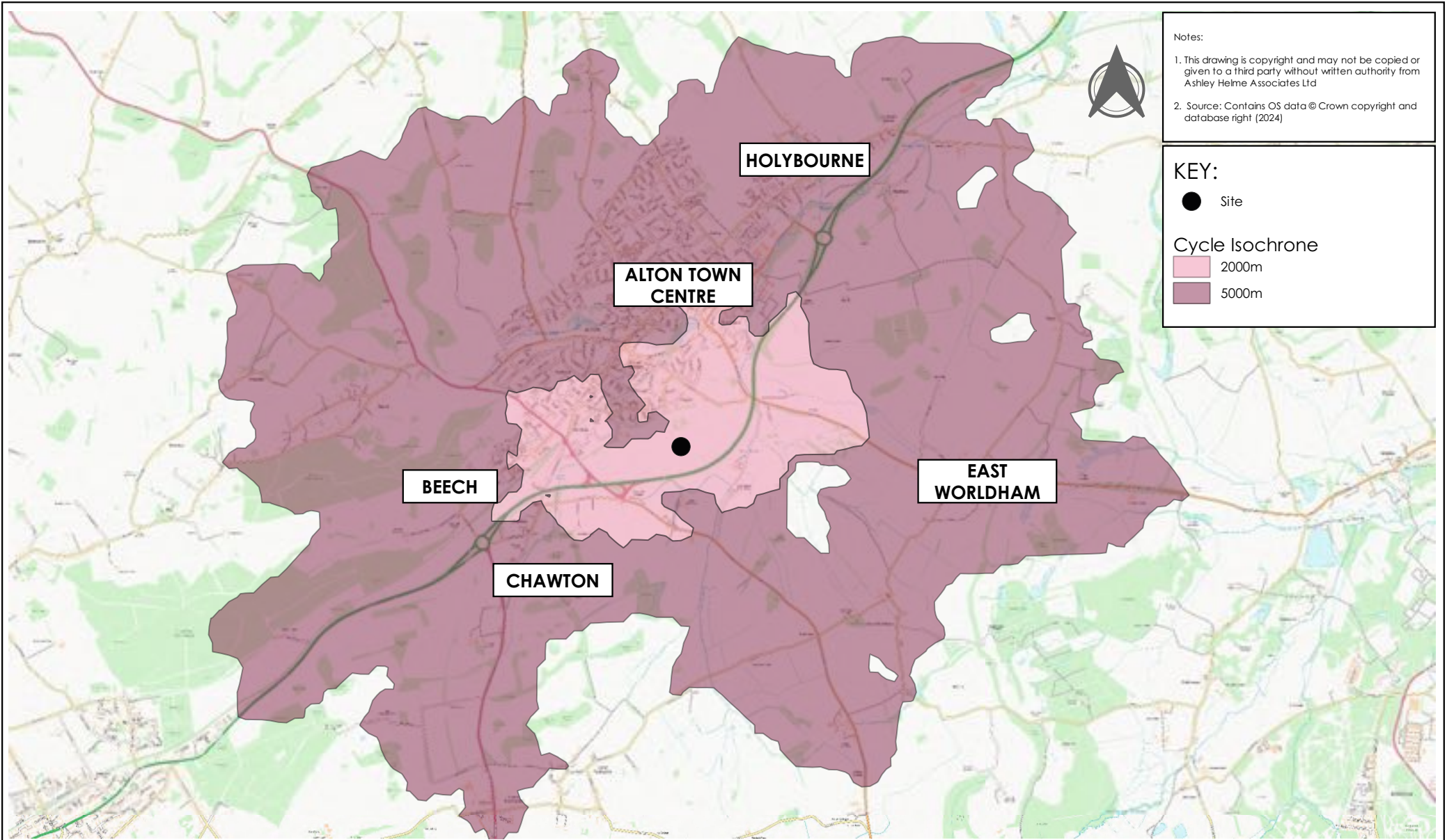
FIGURE 4.2

---

Date:  
FEBRUARY 2024

Scale:  
NTS





Notes:

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KEY:

- Site

Cycle Isochrone

- 2000m
- 5000m

Project:  
ALTON, HAMPSHIRE

Title:  
CYCLE ISOCHRONES

FIGURE 4.3



Client:  
RUBIX LAND

Date:  
FEBRUARY 2024

Scale:  
NTS

## Tables

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BUS NUMBER	ROUTE	FREQUENCY			OPERATOR
		MONDAY-SATURDAY		SUN	
		DAY	EVE		

Services calling on Draymans Way (Sainsbury's Stop G) within a circa 1200m walk of the Site					
205	Alton – Lower Farringdon – Newton Valence – Tisted Village Hall	2 trips <sup>(1)</sup>	-	-	HCT
208	Alton – Beech – Medstead - Bentworth	3 trips <sup>(2)</sup>	-	-	HCT

Services calling on Draymans Way (Stop D) within a circa 1200m walk of the Site					
9	Alton – Manor Estate	3 trips <sup>(3)</sup>	-	-	SC
38	Petersfield Station – Holybourne Eggars School	1 trip <sup>(4)</sup>	-	-	SC
65	Alton – Farnham - Guildford	60 mins	60 mins	-	SC
113	Liphook – Holybourne Alton College	1 trip <sup>(5)</sup>	-	-	SC
123	Holybourne Alton College - Liphook	2 trips <sup>(6)</sup>	-	-	SC
206	Alton – Upper Froyle – Bentley – Binstead - Alton	2 trips <sup>(7)</sup>			

Services calling on Alton High Street (Stop H) within a circa 1600m walk of the Site					
13	Whitehill – Selbourne – Alton – Hook – Basingstoke <sup>(8)</sup>	60 mins	60 mins	-	SC
37X	Cowplain – Alton College	1 trip <sup>(9)</sup>	-	-	SC
64	Winchester – Alton <sup>(10)</sup>	30 mins	60 mins	30 mins	SC
64X	Peter Symonds College - Alton	1 trip <sup>(11)</sup>	-	-	SC

Key:  
SC Stagecoach  
HCT Hampshire Community Transport

Notes:  
(1) Service departs from Tisted Village Hall at 09:20 arriving at Alton (Stop F) at 09:57, then departing Alton (Stop G) at 12:18  
(2) 3 circular trips departing Alton Stop G at 09:35, 11:35 and 13:35

- (3) 3 circular trips departing Alton Stop D at 10:01, 11:01 and 12:01
- (4) 1 trip departing Alton Stop D at 08:07, arriving at Holybourne Eggars School at 08:19. Return journey made on the 38X departs at 16:40 from Alton High Street Stop B
- (5) 1 trip departing Alton Stop D, arriving at Holybourne Alton College at 09:42
- (6) 1 trip departing Holybourne Alton College at 16:40, arriving in Liphook at 18:12, with a further morning service available collecting at Alton Stop D at 09:47 and arriving at Holybourne Alton college at 09:47
- (7) 2 circular trips departing Alton Stop D at 10:49 and 12:49
- (8) Passengers heading in the return direction to Whitehill must board at Alton High Street Stop B
- (9) 1 trip departing Alton Stop H at 09:40, arriving at Holybourne Alton College at 09:45
- (10) For the return journey to be made back to Winchester, passengers must board at Alton high Street Stop A
- (11) 1 trip departing Peter Symonds College at 16:48, arriving at Alton Stop H at 17:48

Source:

<https://www.hants.gov.uk/transport/publictransport>

## **Table 5.1      Bus Services & Frequencies**

AREA OF WORKPLACE RESIDENT POPULATION	ROUTE ASSIGNMENT										TOTAL	%	
	A31 (N)	NEW ODIHAM ROAD	SELBOURNE ROAD (E)	A31 (S)	A339 BASINGSTOKE ROAD	LONDON ROAD	HIGH STREET	ANSTEY LANE	A32 GOSPORT ROAD	MILL LANE			
LOCAL AUTHORITY/COUNTY/REGION													
Greater London	101											101	2.3
Hertfordshire	10											10	0.2
Bracknell Forest	17	17										34	0.8
Milton Keynes	1											1	0.0
Portsmouth			41									41	0.9
Reading		33										33	0.7
Slough	11											11	0.2
Southampton				24								24	0.5
West Berkshire		49										49	1.1
Windsor and Maidenhead	15											15	0.3
Wokingham		25										25	0.6
Aylesbury Vale	1											1	0.0
South Buckinghamshire	2											2	0.0
Wycombe		4										4	0.1
Basingstoke and Deane					397							397	9.0
Eastleigh				47								47	1.1
Fareham									23			23	0.5
Gosport			3									3	0.1
Hart		248										248	5.6
Havant			22									22	0.5
New Forest				14								14	0.3
Rushmoor	201											201	4.6
Test Valley					31							31	0.7
Winchester				190								190	4.3
Dartford	4											4	0.1
Oxfordshire					8							8	0.2
Elmbridge	22											22	0.5
Epsom and Ewell	6											6	0.1
Guildford	185											185	4.2
Mole Valley	14											14	0.3
Reigate and Banstead	8											8	0.2
Runnymede	28											28	0.6
Spelthorne	13											13	0.3
Surrey Heath	58											58	1.3
Waverley	303		76									379	8.6
Woking	35											35	0.8
Arun			1									1	0.0
Chichester			37									37	0.8
Crawley	9											9	0.2
Mid Sussex	1											1	0.0
Bournemouth				3								3	0.1
Swindon		1										1	0.0
Wiltshire					14							14	0.3
Dorset				2	1							3	0.1
MIDDLE SUPER OUTPUT AREA													
East Hampshire 001					249	249	383					498	11.3
East Hampshire 002							383					383	8.7
East Hampshire 003								304		305		609	13.8
East Hampshire 004			35									35	0.8
East Hampshire 006			29									29	0.7
East Hampshire 007				214								214	4.9
East Hampshire 008			139									139	3.2
East Hampshire 009			31									31	0.7
East Hampshire 010			11									11	0.2
East Hampshire 011			19						19			38	0.9
East Hampshire 012									34			34	0.8
East Hampshire 013									1			1	0.0
East Hampshire 014									1			1	0.0
East Hampshire 016									6			6	0.1
East Hampshire 017			19									19	0.4
<b>TOTAL</b>	<b>1045</b>	<b>377</b>	<b>463</b>	<b>494</b>	<b>700</b>	<b>249</b>	<b>383</b>	<b>304</b>	<b>84</b>	<b>305</b>	<b>4404</b>		100.0
%	23.7	8.6	10.5	11.2	15.9	5.7	8.7	6.9	1.9	6.9	100.0		

Table 6.1 2011 Census Distribution  
Place of Work  
Residents in East Hampshire 002 & 003 Middle Super Output Areas



Calculation Reference: AUDIT-733101-240220-0242

**TRIP RATE CALCULATION SELECTION PARAMETERS:**

Land Use : 04 - EDUCATION

Category : A - PRIMARY

**MULTI-MODAL TOTAL VEHICLES**

Selected regions and areas:

<b>03</b>	<b>SOUTH WEST</b>	
	WL WILTSHIRE	1 days
<b>07</b>	<b>YORKSHIRE &amp; NORTH LINCOLNSHIRE</b>	
	NY NORTH YORKSHIRE	3 days
<b>09</b>	<b>NORTH</b>	
	TV TEES VALLEY	2 days

*This section displays the number of survey days per TRICS® sub-region in the selected set*



**Primary Filtering selection:**

*This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter: Number of pupils  
 Actual Range: 126 to 245 (units: )  
 Range Selected by User: 100 to 350 (units: )

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/15 to 26/05/22

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*

Selected survey days:

Monday	2 days
Tuesday	1 days
Wednesday	1 days
Thursday	1 days
Friday	1 days

*This data displays the number of selected surveys by day of the week.*

Selected survey types:

Manual count	6 days
Directional ATC Count	0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*

Selected Locations:

Edge of Town Centre	3
Edge of Town	1
Neighbourhood Centre (PPS6 Local Centre)	2

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*

Selected Location Sub Categories:

Residential Zone	1
Built-Up Zone	1
Village	2
No Sub Category	2

*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.*

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	5 days - Selected
Servicing vehicles Excluded	1 days - Selected

**Secondary Filtering selection:**Use Class:

F1(a) 6 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.*

Population within 500m Range:

All Surveys Included

**Secondary Filtering selection (Cont.):**Population within 1 mile:

1,001 to 5,000	1 days
10,001 to 15,000	3 days
15,001 to 20,000	1 days
20,001 to 25,000	1 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

Population within 5 miles:

5,001 to 25,000	2 days
25,001 to 50,000	2 days
125,001 to 250,000	2 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.6 to 1.0	5 days
1.1 to 1.5	1 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

No	6 days
----	--------

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*

PTAL Rating:

No PTAL Present	6 days
-----------------	--------

*This data displays the number of selected surveys with PTAL Ratings.*

LIST OF SITES relevant to selection parameters

<b>1</b>	<b>NY-04-A-04</b> GARGRAVE ROAD SKIPTON	<b>CATHOLIC PRIMARY SCHOOL</b>	<b>NORTH YORKSHIRE</b>
	Edge of Town Centre Built-Up Zone Total Number of pupils: 243 Survey date: FRIDAY 15/03/19		Survey Type: MANUAL
<b>2</b>	<b>NY-04-A-05</b> CHURCH LANE RIPON	<b>PRIMARY SCHOOL</b>	<b>NORTH YORKSHIRE</b>
	Edge of Town Centre No Sub Category Total Number of pupils: 156 Survey date: TUESDAY 17/05/22		Survey Type: MANUAL
<b>3</b>	<b>NY-04-A-06</b> CHURCH LANE RIPON	<b>PRIMARY SCHOOL</b>	<b>NORTH YORKSHIRE</b>
	Edge of Town Centre No Sub Category Total Number of pupils: 245 Survey date: MONDAY 23/05/22		Survey Type: MANUAL
<b>4</b>	<b>TV-04-A-02</b> WOLVISTON MILL LANE BILLINGHAM	<b>PRIMARY SCHOOL</b>	<b>TEES VALLEY</b>
	Edge of Town Residential Zone Total Number of pupils: 232 Survey date: MONDAY 23/05/22		Survey Type: MANUAL
<b>5</b>	<b>TV-04-A-03</b> THE GREEN BILLINGHAM WOLVISTON Neighbourhood Centre (PPS6 Local Centre) Village	<b>PRIMARY SCHOOL</b>	<b>TEES VALLEY</b>
	Total Number of pupils: 126 Survey date: THURSDAY 26/05/22		Survey Type: MANUAL
<b>6</b>	<b>WL-04-A-02</b> HIGH STREET ROWDE	<b>C OF E PRIMARY ACADEMY</b>	<b>WILTSHIRE</b>
	Neighbourhood Centre (PPS6 Local Centre) Village Total Number of pupils: 199 Survey date: WEDNESDAY 03/04/19		Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL TOTAL VEHICLES**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Total People to Total Vehicles ratio (all time periods and directions): 1.67

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.071	6	200	0.027	6	200	0.098
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.459</b>	6	200	0.322	<b>6</b>	<b>200</b>	<b>0.781</b>
09:00 - 10:00	6	200	0.021	6	200	0.131	6	200	0.152
10:00 - 11:00	6	200	0.015	6	200	0.011	6	200	0.026
11:00 - 12:00	6	200	0.022	6	200	0.026	6	200	0.048
12:00 - 13:00	6	200	0.019	6	200	0.017	6	200	0.036
13:00 - 14:00	6	200	0.014	6	200	0.022	6	200	0.036
14:00 - 15:00	6	200	0.046	6	200	0.047	6	200	0.093
15:00 - 16:00	6	200	0.311	<b>6</b>	<b>200</b>	<b>0.348</b>	6	200	0.659
16:00 - 17:00	6	200	0.052	6	200	0.069	6	200	0.121
17:00 - 18:00	5	200	0.005	5	200	0.021	5	200	0.026
18:00 - 19:00	5	200	0.001	5	200	0.001	5	200	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
<b>Total Rates:</b>			1.036			1.042			2.078

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

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**Parameter summary**

Trip rate parameter range selected: 126 - 245 (units: )  
 Survey date date range: 01/01/15 - 26/05/22  
 Number of weekdays (Monday-Friday): 6  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys automatically removed from selection: 0  
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL TAXIS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.001	6	200	0.001	6	200	0.002
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.004</b>	<b>6</b>	<b>200</b>	<b>0.004</b>	<b>6</b>	<b>200</b>	<b>0.008</b>
09:00 - 10:00	6	200	0.000	6	200	0.000	6	200	0.000
10:00 - 11:00	6	200	0.000	6	200	0.000	6	200	0.000
11:00 - 12:00	6	200	0.000	6	200	0.000	6	200	0.000
12:00 - 13:00	6	200	0.000	6	200	0.000	6	200	0.000
13:00 - 14:00	6	200	0.000	6	200	0.000	6	200	0.000
14:00 - 15:00	6	200	0.001	6	200	0.001	6	200	0.002
15:00 - 16:00	6	200	0.003	6	200	0.003	6	200	0.006
16:00 - 17:00	6	200	0.000	6	200	0.000	6	200	0.000
17:00 - 18:00	5	200	0.000	5	200	0.000	5	200	0.000
18:00 - 19:00	5	200	0.000	5	200	0.000	5	200	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.009			0.009			0.018

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL OGVS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.000	6	200	0.000	6	200	0.000
08:00 - 09:00	6	200	0.001	6	200	0.001	6	200	0.002
09:00 - 10:00	6	200	0.000	6	200	0.000	6	200	0.000
10:00 - 11:00	6	200	0.001	6	200	0.001	6	200	0.002
11:00 - 12:00	<b>6</b>	<b>200</b>	<b>0.002</b>	6	200	0.000	6	200	0.002
12:00 - 13:00	6	200	0.001	<b>6</b>	<b>200</b>	<b>0.002</b>	<b>6</b>	<b>200</b>	<b>0.003</b>
13:00 - 14:00	6	200	0.000	6	200	0.000	6	200	0.000
14:00 - 15:00	6	200	0.000	6	200	0.000	6	200	0.000
15:00 - 16:00	6	200	0.000	6	200	0.000	6	200	0.000
16:00 - 17:00	6	200	0.000	6	200	0.000	6	200	0.000
17:00 - 18:00	5	200	0.000	5	200	0.000	5	200	0.000
18:00 - 19:00	5	200	0.000	5	200	0.000	5	200	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.005			0.004			0.009

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL PSVS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.000	6	200	0.000	6	200	0.000
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.001</b>	6	200	0.001	<b>6</b>	<b>200</b>	<b>0.002</b>
09:00 - 10:00	6	200	0.001	6	200	0.001	6	200	0.002
10:00 - 11:00	6	200	0.000	6	200	0.000	6	200	0.000
11:00 - 12:00	6	200	0.001	6	200	0.001	6	200	0.002
12:00 - 13:00	6	200	0.000	6	200	0.000	6	200	0.000
13:00 - 14:00	6	200	0.001	6	200	0.000	6	200	0.001
14:00 - 15:00	6	200	0.001	6	200	0.000	6	200	0.001
15:00 - 16:00	6	200	0.000	<b>6</b>	<b>200</b>	<b>0.002</b>	6	200	0.002
16:00 - 17:00	6	200	0.000	6	200	0.000	6	200	0.000
17:00 - 18:00	5	200	0.000	5	200	0.000	5	200	0.000
18:00 - 19:00	5	200	0.000	5	200	0.000	5	200	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.005			0.005			0.010

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL CYCLISTS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.000	6	200	0.000	6	200	0.000
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.014</b>	6	200	0.000	<b>6</b>	<b>200</b>	<b>0.014</b>
09:00 - 10:00	6	200	0.000	6	200	0.000	6	200	0.000
10:00 - 11:00	6	200	0.000	6	200	0.000	6	200	0.000
11:00 - 12:00	6	200	0.000	6	200	0.000	6	200	0.000
12:00 - 13:00	6	200	0.000	6	200	0.000	6	200	0.000
13:00 - 14:00	6	200	0.000	6	200	0.000	6	200	0.000
14:00 - 15:00	6	200	0.000	6	200	0.000	6	200	0.000
15:00 - 16:00	6	200	0.000	<b>6</b>	<b>200</b>	<b>0.013</b>	6	200	0.013
16:00 - 17:00	6	200	0.000	6	200	0.000	6	200	0.000
17:00 - 18:00	5	200	0.000	5	200	0.001	5	200	0.001
18:00 - 19:00	5	200	0.000	5	200	0.000	5	200	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.014			0.014			0.028

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.



TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL PEDESTRIANS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.004	6	200	0.001	6	200	0.005
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.467</b>	6	200	0.207	6	200	0.674
09:00 - 10:00	6	200	0.028	6	200	0.029	6	200	0.057
10:00 - 11:00	6	200	0.022	6	200	0.005	6	200	0.027
11:00 - 12:00	6	200	0.012	6	200	0.010	6	200	0.022
12:00 - 13:00	6	200	0.022	6	200	0.015	6	200	0.037
13:00 - 14:00	6	200	0.002	6	200	0.003	6	200	0.005
14:00 - 15:00	6	200	0.008	6	200	0.022	6	200	0.030
15:00 - 16:00	6	200	0.220	<b>6</b>	<b>200</b>	<b>0.515</b>	<b>6</b>	<b>200</b>	<b>0.735</b>
16:00 - 17:00	6	200	0.011	6	200	0.027	6	200	0.038
17:00 - 18:00	5	200	0.001	5	200	0.002	5	200	0.003
18:00 - 19:00	5	200	0.000	5	200	0.001	5	200	0.001
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.797			0.837			1.634

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL BUS/TRAM PASSENGERS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.000	6	200	0.000	6	200	0.000
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.018</b>	6	200	0.009	<b>6</b>	<b>200</b>	<b>0.027</b>
09:00 - 10:00	6	200	0.000	6	200	0.000	6	200	0.000
10:00 - 11:00	6	200	0.000	6	200	0.000	6	200	0.000
11:00 - 12:00	6	200	0.000	6	200	0.000	6	200	0.000
12:00 - 13:00	6	200	0.000	6	200	0.000	6	200	0.000
13:00 - 14:00	6	200	0.000	6	200	0.000	6	200	0.000
14:00 - 15:00	6	200	0.000	6	200	0.000	6	200	0.000
15:00 - 16:00	6	200	0.008	<b>6</b>	<b>200</b>	<b>0.017</b>	6	200	0.025
16:00 - 17:00	6	200	0.001	6	200	0.001	6	200	0.002
17:00 - 18:00	5	200	0.000	5	200	0.000	5	200	0.000
18:00 - 19:00	5	200	0.000	5	200	0.000	5	200	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.027			0.027			0.054

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL COACH PASSENGERS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.003	6	200	0.000	6	200	0.003
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.012</b>	6	200	0.000	<b>6</b>	<b>200</b>	<b>0.012</b>
09:00 - 10:00	6	200	0.001	6	200	0.008	6	200	0.009
10:00 - 11:00	6	200	0.000	6	200	0.000	6	200	0.000
11:00 - 12:00	6	200	0.008	6	200	0.000	6	200	0.008
12:00 - 13:00	6	200	0.000	6	200	0.000	6	200	0.000
13:00 - 14:00	6	200	0.000	6	200	0.000	6	200	0.000
14:00 - 15:00	6	200	0.000	6	200	0.000	6	200	0.000
15:00 - 16:00	6	200	0.000	<b>6</b>	<b>200</b>	<b>0.011</b>	6	200	0.011
16:00 - 17:00	6	200	0.000	6	200	0.005	6	200	0.005
17:00 - 18:00	5	200	0.000	5	200	0.000	5	200	0.000
18:00 - 19:00	5	200	0.000	5	200	0.000	5	200	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.024			0.024			0.048

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY  
**MULTI-MODAL PUBLIC TRANSPORT USERS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.003	6	200	0.000	6	200	0.003
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.030</b>	6	200	0.009	<b>6</b>	<b>200</b>	<b>0.039</b>
09:00 - 10:00	6	200	0.001	6	200	0.008	6	200	0.009
10:00 - 11:00	6	200	0.000	6	200	0.000	6	200	0.000
11:00 - 12:00	6	200	0.008	6	200	0.000	6	200	0.008
12:00 - 13:00	6	200	0.000	6	200	0.000	6	200	0.000
13:00 - 14:00	6	200	0.000	6	200	0.000	6	200	0.000
14:00 - 15:00	6	200	0.000	6	200	0.000	6	200	0.000
15:00 - 16:00	6	200	0.008	<b>6</b>	<b>200</b>	<b>0.028</b>	6	200	0.036
16:00 - 17:00	6	200	0.001	6	200	0.006	6	200	0.007
17:00 - 18:00	5	200	0.000	5	200	0.000	5	200	0.000
18:00 - 19:00	5	200	0.000	5	200	0.000	5	200	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.051			0.051			0.102

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL TOTAL PEOPLE**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Total People to Total Vehicles ratio (all time periods and directions): 1.67

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.087	6	200	0.016	6	200	0.103
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>1.127</b>	6	200	0.299	<b>6</b>	<b>200</b>	<b>1.426</b>
09:00 - 10:00	6	200	0.051	6	200	0.049	6	200	0.100
10:00 - 11:00	6	200	0.037	6	200	0.015	6	200	0.052
11:00 - 12:00	6	200	0.039	6	200	0.036	6	200	0.075
12:00 - 13:00	6	200	0.042	6	200	0.032	6	200	0.074
13:00 - 14:00	6	200	0.016	6	200	0.030	6	200	0.046
14:00 - 15:00	6	200	0.029	6	200	0.083	6	200	0.112
15:00 - 16:00	6	200	0.264	<b>6</b>	<b>200</b>	<b>1.019</b>	6	200	1.283
16:00 - 17:00	6	200	0.040	6	200	0.132	6	200	0.172
17:00 - 18:00	5	200	0.001	5	200	0.024	5	200	0.025
18:00 - 19:00	5	200	0.000	5	200	0.002	5	200	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
<b>Total Rates:</b>			1.733			1.737			3.470

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL CARS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.067	6	200	0.022	6	200	0.089
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.449</b>	6	200	0.313	<b>6</b>	<b>200</b>	<b>0.762</b>
09:00 - 10:00	6	200	0.017	6	200	0.129	6	200	0.146
10:00 - 11:00	6	200	0.012	6	200	0.007	6	200	0.019
11:00 - 12:00	6	200	0.017	6	200	0.022	6	200	0.039
12:00 - 13:00	6	200	0.018	6	200	0.014	6	200	0.032
13:00 - 14:00	6	200	0.010	6	200	0.022	6	200	0.032
14:00 - 15:00	6	200	0.043	6	200	0.044	6	200	0.087
15:00 - 16:00	6	200	0.306	<b>6</b>	<b>200</b>	<b>0.342</b>	6	200	0.648
16:00 - 17:00	6	200	0.052	6	200	0.068	6	200	0.120
17:00 - 18:00	5	200	0.005	5	200	0.021	5	200	0.026
18:00 - 19:00	5	200	0.001	5	200	0.001	5	200	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.997			1.005			2.002

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 04 - EDUCATION/A - PRIMARY

**MULTI-MODAL LGVS**

**Calculation factor: 1 PUPILS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate	No. Days	Ave. PUPILS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	200	0.003	<b>6</b>	<b>200</b>	<b>0.003</b>	6	200	0.006
08:00 - 09:00	<b>6</b>	<b>200</b>	<b>0.004</b>	6	200	0.003	<b>6</b>	<b>200</b>	<b>0.007</b>
09:00 - 10:00	6	200	0.002	6	200	0.001	6	200	0.003
10:00 - 11:00	6	200	0.002	6	200	0.003	6	200	0.005
11:00 - 12:00	6	200	0.002	6	200	0.003	6	200	0.005
12:00 - 13:00	6	200	0.000	6	200	0.001	6	200	0.001
13:00 - 14:00	6	200	0.003	6	200	0.001	6	200	0.004
14:00 - 15:00	6	200	0.001	6	200	0.002	6	200	0.003
15:00 - 16:00	6	200	0.001	6	200	0.001	6	200	0.002
16:00 - 17:00	6	200	0.000	6	200	0.001	6	200	0.001
17:00 - 18:00	5	200	0.000	5	200	0.000	5	200	0.000
18:00 - 19:00	5	200	0.000	5	200	0.000	5	200	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.018			0.019			0.037

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

Calculation Reference: AUDIT-733101-240220-0253

**TRIP RATE CALCULATION SELECTION PARAMETERS:**

Land Use : 03 - RESIDENTIAL  
Category : A - HOUSES PRIVATELY OWNED

**MULTI-MODAL TOTAL VEHICLES**

Selected regions and areas:

<b>02</b>	<b>SOUTH EAST</b>	
	SC SURREY	1 days
	WS WEST SUSSEX	1 days
<b>04</b>	<b>EAST ANGLIA</b>	
	NF NORFOLK	4 days

*This section displays the number of survey days per TRICS® sub-region in the selected set*



**Primary Filtering selection:**

*This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter: No of Dwellings  
 Actual Range: 514 to 1146 (units: )  
 Range Selected by User: 500 to 1500 (units: )

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/15 to 22/09/22

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*

Selected survey days:

Tuesday 3 days  
 Wednesday 2 days  
 Thursday 1 days

*This data displays the number of selected surveys by day of the week.*

Selected survey types:

Manual count 6 days  
 Directional ATC Count 0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*

Selected Locations:

Edge of Town 6

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*

Selected Location Sub Categories:

Residential Zone 5  
 Out of Town 1

*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.*

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included 3 days - Selected  
 Servicing vehicles Excluded 4 days - Selected

**Secondary Filtering selection:**Use Class:

C3 6 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.*

Population within 500m Range:

All Surveys Included

**Secondary Filtering selection (Cont.):**Population within 1 mile:

1,001 to 5,000	1 days
5,001 to 10,000	2 days
10,001 to 15,000	1 days
15,001 to 20,000	2 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

Population within 5 miles:

25,001 to 50,000	1 days
75,001 to 100,000	2 days
125,001 to 250,000	3 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.6 to 1.0	2 days
1.1 to 1.5	3 days
1.6 to 2.0	1 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

Yes	6 days
-----	--------

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*

PTAL Rating:

No PTAL Present	6 days
-----------------	--------

*This data displays the number of selected surveys with PTAL Ratings.*

LIST OF SITES relevant to selection parameters

<b>1</b>	<b>NF-03-A-09</b>	<b>MIXED HOUSES &amp; FLATS</b>	<b>NORFOLK</b>
	ROUND HOUSE WAY		
	NORWICH		
	CRINGLEFORD		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	984	
	Survey date: TUESDAY	24/09/19	Survey Type: MANUAL
<b>2</b>	<b>NF-03-A-23</b>	<b>MIXED HOUSES &amp; FLATS</b>	<b>NORFOLK</b>
	SILFIELD ROAD		
	WYMONDHAM		
	Edge of Town		
	Out of Town		
	Total No of Dwellings:	514	
	Survey date: WEDNESDAY	22/09/21	Survey Type: MANUAL
<b>3</b>	<b>NF-03-A-28</b>	<b>MIXED HOUSES &amp; FLATS</b>	<b>NORFOLK</b>
	ATLANTIC AVENUE		
	NORWICH		
	SPROWSTON		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	1146	
	Survey date: THURSDAY	22/09/22	Survey Type: MANUAL
<b>4</b>	<b>NF-03-A-38</b>	<b>MIXED HOUSES</b>	<b>NORFOLK</b>
	BEAUFORT WAY		
	GREAT YARMOUTH		
	BRADWELL		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	537	
	Survey date: TUESDAY	20/09/22	Survey Type: MANUAL
<b>5</b>	<b>SC-03-A-08</b>	<b>MIXED HOUSES</b>	<b>SURREY</b>
	REIGATE ROAD		
	HORLEY		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	790	
	Survey date: WEDNESDAY	04/05/22	Survey Type: MANUAL
<b>6</b>	<b>WS-03-A-11</b>	<b>MIXED HOUSES</b>	<b>WEST SUSSEX</b>
	ELLIS ROAD		
	WEST HORSHAM		
	S BROADBRIDGE HEATH		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	918	
	Survey date: TUESDAY	02/04/19	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL TOTAL VEHICLES**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Total People to Total Vehicles ratio (all time periods and directions): 1.61

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.074	6	815	0.306	6	815	0.380
08:00 - 09:00	6	815	0.163	<b>6</b>	<b>815</b>	<b>0.395</b>	<b>6</b>	<b>815</b>	<b>0.558</b>
09:00 - 10:00	6	815	0.133	6	815	0.146	6	815	0.279
10:00 - 11:00	6	815	0.103	6	815	0.118	6	815	0.221
11:00 - 12:00	6	815	0.106	6	815	0.111	6	815	0.217
12:00 - 13:00	6	815	0.136	6	815	0.135	6	815	0.271
13:00 - 14:00	6	815	0.130	6	815	0.121	6	815	0.251
14:00 - 15:00	6	815	0.134	6	815	0.155	6	815	0.289
15:00 - 16:00	6	815	0.228	6	815	0.152	6	815	0.380
16:00 - 17:00	6	815	0.257	6	815	0.150	6	815	0.407
17:00 - 18:00	<b>6</b>	<b>815</b>	<b>0.350</b>	6	815	0.169	6	815	0.519
18:00 - 19:00	6	815	0.298	6	815	0.146	6	815	0.444
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
<b>Total Rates:</b>			2.112			2.104			4.216

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

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**Parameter summary**

Trip rate parameter range selected: 514 - 1146 (units: )  
 Survey date date range: 01/01/15 - 22/09/22  
 Number of weekdays (Monday-Friday): 6  
 Number of Saturdays: 0  
 Number of Sundays: 0  
 Surveys automatically removed from selection: 1  
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL TAXIS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.002	6	815	0.002	6	815	0.004
08:00 - 09:00	<b>6</b>	<b>815</b>	<b>0.005</b>	<b>6</b>	<b>815</b>	<b>0.006</b>	<b>6</b>	<b>815</b>	<b>0.011</b>
09:00 - 10:00	6	815	0.002	6	815	0.001	6	815	0.003
10:00 - 11:00	6	815	0.001	6	815	0.001	6	815	0.002
11:00 - 12:00	6	815	0.001	6	815	0.000	6	815	0.001
12:00 - 13:00	6	815	0.001	6	815	0.002	6	815	0.003
13:00 - 14:00	6	815	0.002	6	815	0.002	6	815	0.004
14:00 - 15:00	6	815	0.002	6	815	0.001	6	815	0.003
15:00 - 16:00	6	815	0.005	6	815	0.005	6	815	0.010
16:00 - 17:00	6	815	0.003	6	815	0.003	6	815	0.006
17:00 - 18:00	6	815	0.003	6	815	0.003	6	815	0.006
18:00 - 19:00	6	815	0.002	6	815	0.002	6	815	0.004
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.029			0.028			0.057

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL OGVS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.000	<b>6</b>	<b>815</b>	<b>0.002</b>	6	815	0.002
08:00 - 09:00	6	815	0.001	6	815	0.001	6	815	0.002
09:00 - 10:00	6	815	0.001	6	815	0.001	6	815	0.002
10:00 - 11:00	6	815	0.001	6	815	0.001	6	815	0.002
11:00 - 12:00	<b>6</b>	<b>815</b>	<b>0.002</b>	6	815	0.001	6	815	0.003
12:00 - 13:00	6	815	0.001	6	815	0.001	6	815	0.002
13:00 - 14:00	6	815	0.002	6	815	0.002	<b>6</b>	<b>815</b>	<b>0.004</b>
14:00 - 15:00	6	815	0.001	6	815	0.001	6	815	0.002
15:00 - 16:00	6	815	0.001	6	815	0.001	6	815	0.002
16:00 - 17:00	6	815	0.001	6	815	0.001	6	815	0.002
17:00 - 18:00	6	815	0.001	6	815	0.001	6	815	0.002
18:00 - 19:00	6	815	0.000	6	815	0.000	6	815	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.012			0.013			0.025

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL PSVS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.000	6	815	0.000	6	815	0.000
08:00 - 09:00	<b>6</b>	<b>815</b>	<b>0.001</b>	<b>6</b>	<b>815</b>	<b>0.001</b>	<b>6</b>	<b>815</b>	<b>0.002</b>
09:00 - 10:00	6	815	0.000	6	815	0.001	6	815	0.001
10:00 - 11:00	6	815	0.000	6	815	0.000	6	815	0.000
11:00 - 12:00	6	815	0.000	6	815	0.000	6	815	0.000
12:00 - 13:00	6	815	0.000	6	815	0.000	6	815	0.000
13:00 - 14:00	6	815	0.000	6	815	0.000	6	815	0.000
14:00 - 15:00	6	815	0.001	6	815	0.001	6	815	0.002
15:00 - 16:00	6	815	0.001	6	815	0.001	6	815	0.002
16:00 - 17:00	6	815	0.001	6	815	0.001	6	815	0.002
17:00 - 18:00	6	815	0.000	6	815	0.000	6	815	0.000
18:00 - 19:00	6	815	0.000	6	815	0.000	6	815	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.004			0.005			0.009

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL CYCLISTS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.003	6	815	0.007	6	815	0.010
08:00 - 09:00	6	815	0.003	<b>6</b>	<b>815</b>	<b>0.017</b>	<b>6</b>	<b>815</b>	<b>0.020</b>
09:00 - 10:00	6	815	0.003	6	815	0.004	6	815	0.007
10:00 - 11:00	6	815	0.001	6	815	0.001	6	815	0.002
11:00 - 12:00	6	815	0.001	6	815	0.001	6	815	0.002
12:00 - 13:00	6	815	0.001	6	815	0.001	6	815	0.002
13:00 - 14:00	6	815	0.001	6	815	0.001	6	815	0.002
14:00 - 15:00	6	815	0.003	6	815	0.003	6	815	0.006
15:00 - 16:00	6	815	0.010	6	815	0.002	6	815	0.012
16:00 - 17:00	<b>6</b>	<b>815</b>	<b>0.010</b>	6	815	0.006	6	815	0.016
17:00 - 18:00	6	815	0.009	6	815	0.004	6	815	0.013
18:00 - 19:00	6	815	0.006	6	815	0.005	6	815	0.011
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.051			0.052			0.103

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.



TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL PEDESTRIANS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.012	6	815	0.044	6	815	0.056
08:00 - 09:00	6	815	0.025	<b>6</b>	<b>815</b>	<b>0.090</b>	<b>6</b>	<b>815</b>	<b>0.115</b>
09:00 - 10:00	6	815	0.017	6	815	0.017	6	815	0.034
10:00 - 11:00	6	815	0.013	6	815	0.015	6	815	0.028
11:00 - 12:00	6	815	0.015	6	815	0.013	6	815	0.028
12:00 - 13:00	6	815	0.018	6	815	0.016	6	815	0.034
13:00 - 14:00	6	815	0.019	6	815	0.018	6	815	0.037
14:00 - 15:00	6	815	0.027	6	815	0.025	6	815	0.052
15:00 - 16:00	<b>6</b>	<b>815</b>	<b>0.069</b>	6	815	0.024	6	815	0.093
16:00 - 17:00	6	815	0.034	6	815	0.013	6	815	0.047
17:00 - 18:00	6	815	0.035	6	815	0.032	6	815	0.067
18:00 - 19:00	6	815	0.033	6	815	0.022	6	815	0.055
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.317			0.329			0.646

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL BUS/TRAM PASSENGERS**

Calculation factor: **1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.001	6	815	0.024	6	815	0.025
08:00 - 09:00	6	815	0.002	<b>6</b>	<b>815</b>	<b>0.025</b>	<b>6</b>	<b>815</b>	<b>0.027</b>
09:00 - 10:00	6	815	0.004	6	815	0.008	6	815	0.012
10:00 - 11:00	6	815	0.004	6	815	0.008	6	815	0.012
11:00 - 12:00	6	815	0.004	6	815	0.008	6	815	0.012
12:00 - 13:00	6	815	0.005	6	815	0.005	6	815	0.010
13:00 - 14:00	6	815	0.003	6	815	0.004	6	815	0.007
14:00 - 15:00	6	815	0.009	6	815	0.006	6	815	0.015
15:00 - 16:00	6	815	0.017	6	815	0.004	6	815	0.021
16:00 - 17:00	<b>6</b>	<b>815</b>	<b>0.023</b>	6	815	0.003	6	815	0.026
17:00 - 18:00	6	815	0.017	6	815	0.003	6	815	0.020
18:00 - 19:00	6	815	0.011	6	815	0.003	6	815	0.014
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.100			0.101			0.201

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL TOTAL RAIL PASSENGERS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.000	<b>6</b>	<b>815</b>	<b>0.002</b>	<b>6</b>	<b>815</b>	<b>0.002</b>
08:00 - 09:00	6	815	0.000	6	815	0.001	6	815	0.001
09:00 - 10:00	6	815	0.000	6	815	0.001	6	815	0.001
10:00 - 11:00	6	815	0.000	6	815	0.000	6	815	0.000
11:00 - 12:00	6	815	0.000	6	815	0.000	6	815	0.000
12:00 - 13:00	6	815	0.000	6	815	0.000	6	815	0.000
13:00 - 14:00	6	815	0.000	6	815	0.001	6	815	0.001
14:00 - 15:00	6	815	0.000	6	815	0.000	6	815	0.000
15:00 - 16:00	6	815	0.000	6	815	0.000	6	815	0.000
16:00 - 17:00	6	815	0.000	6	815	0.000	6	815	0.000
17:00 - 18:00	6	815	0.001	6	815	0.000	6	815	0.001
18:00 - 19:00	<b>6</b>	<b>815</b>	<b>0.002</b>	6	815	0.000	6	815	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.003			0.005			0.008

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL COACH PASSENGERS**

Calculation factor: **1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.000	6	815	0.000	6	815	0.000
08:00 - 09:00	6	815	0.000	<b>6</b>	<b>815</b>	<b>0.001</b>	<b>6</b>	<b>815</b>	<b>0.001</b>
09:00 - 10:00	6	815	0.000	6	815	0.000	6	815	0.000
10:00 - 11:00	6	815	0.000	6	815	0.000	6	815	0.000
11:00 - 12:00	6	815	0.000	6	815	0.000	6	815	0.000
12:00 - 13:00	6	815	0.000	6	815	0.000	6	815	0.000
13:00 - 14:00	6	815	0.000	6	815	0.000	6	815	0.000
14:00 - 15:00	6	815	0.000	6	815	0.000	6	815	0.000
15:00 - 16:00	<b>6</b>	<b>815</b>	<b>0.000</b>	6	815	0.000	6	815	0.000
16:00 - 17:00	6	815	0.000	6	815	0.000	6	815	0.000
17:00 - 18:00	6	815	0.000	6	815	0.000	6	815	0.000
18:00 - 19:00	6	815	0.000	6	815	0.000	6	815	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.001			0.001

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL PUBLIC TRANSPORT USERS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.001	6	815	0.026	6	815	0.027
08:00 - 09:00	6	815	0.002	<b>6</b>	<b>815</b>	<b>0.027</b>	<b>6</b>	<b>815</b>	<b>0.029</b>
09:00 - 10:00	6	815	0.004	6	815	0.009	6	815	0.013
10:00 - 11:00	6	815	0.004	6	815	0.008	6	815	0.012
11:00 - 12:00	6	815	0.004	6	815	0.008	6	815	0.012
12:00 - 13:00	6	815	0.005	6	815	0.006	6	815	0.011
13:00 - 14:00	6	815	0.003	6	815	0.005	6	815	0.008
14:00 - 15:00	6	815	0.009	6	815	0.006	6	815	0.015
15:00 - 16:00	6	815	0.018	6	815	0.004	6	815	0.022
16:00 - 17:00	<b>6</b>	<b>815</b>	<b>0.023</b>	6	815	0.003	6	815	0.026
17:00 - 18:00	6	815	0.018	6	815	0.003	6	815	0.021
18:00 - 19:00	6	815	0.013	6	815	0.003	6	815	0.016
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.104			0.108			0.212

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL CARS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.060	6	815	0.274	6	815	0.334
08:00 - 09:00	6	815	0.140	<b>6</b>	<b>815</b>	<b>0.362</b>	<b>6</b>	<b>815</b>	<b>0.502</b>
09:00 - 10:00	6	815	0.116	6	815	0.128	6	815	0.244
10:00 - 11:00	6	815	0.085	6	815	0.098	6	815	0.183
11:00 - 12:00	6	815	0.089	6	815	0.093	6	815	0.182
12:00 - 13:00	6	815	0.118	6	815	0.114	6	815	0.232
13:00 - 14:00	6	815	0.112	6	815	0.103	6	815	0.215
14:00 - 15:00	6	815	0.116	6	815	0.138	6	815	0.254
15:00 - 16:00	6	815	0.204	6	815	0.129	6	815	0.333
16:00 - 17:00	6	815	0.224	6	815	0.130	6	815	0.354
17:00 - 18:00	<b>6</b>	<b>815</b>	<b>0.319</b>	6	815	0.152	6	815	0.471
18:00 - 19:00	6	815	0.274	6	815	0.133	6	815	0.407
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.857			1.854			3.711

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL LGVS**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.010	<b>6</b>	<b>815</b>	<b>0.026</b>	6	815	0.036
08:00 - 09:00	6	815	0.015	6	815	0.021	6	815	0.036
09:00 - 10:00	6	815	0.013	6	815	0.015	6	815	0.028
10:00 - 11:00	6	815	0.014	6	815	0.016	6	815	0.030
11:00 - 12:00	6	815	0.014	6	815	0.015	6	815	0.029
12:00 - 13:00	6	815	0.015	6	815	0.017	6	815	0.032
13:00 - 14:00	6	815	0.014	6	815	0.013	6	815	0.027
14:00 - 15:00	6	815	0.012	6	815	0.014	6	815	0.026
15:00 - 16:00	6	815	0.016	6	815	0.015	6	815	0.031
16:00 - 17:00	<b>6</b>	<b>815</b>	<b>0.027</b>	6	815	0.014	<b>6</b>	<b>815</b>	<b>0.041</b>
17:00 - 18:00	6	815	0.025	6	815	0.012	6	815	0.037
18:00 - 19:00	6	815	0.017	6	815	0.009	6	815	0.026
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.192			0.187			0.379

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**MULTI-MODAL MOTOR CYCLES**

**Calculation factor: 1 DWELLS**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	6	815	0.001	6	815	0.002	6	815	0.003
08:00 - 09:00	6	815	0.001	<b>6</b>	<b>815</b>	<b>0.004</b>	<b>6</b>	<b>815</b>	<b>0.005</b>
09:00 - 10:00	6	815	0.000	6	815	0.000	6	815	0.000
10:00 - 11:00	6	815	0.001	6	815	0.002	6	815	0.003
11:00 - 12:00	6	815	0.000	6	815	0.001	6	815	0.001
12:00 - 13:00	6	815	0.000	6	815	0.001	6	815	0.001
13:00 - 14:00	6	815	0.001	6	815	0.002	6	815	0.003
14:00 - 15:00	6	815	0.001	6	815	0.001	6	815	0.002
15:00 - 16:00	6	815	0.002	6	815	0.002	6	815	0.004
16:00 - 17:00	6	815	0.001	6	815	0.001	6	815	0.002
17:00 - 18:00	6	815	0.003	6	815	0.001	6	815	0.004
18:00 - 19:00	<b>6</b>	<b>815</b>	<b>0.004</b>	6	815	0.001	6	815	0.005
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.015			0.018			0.033

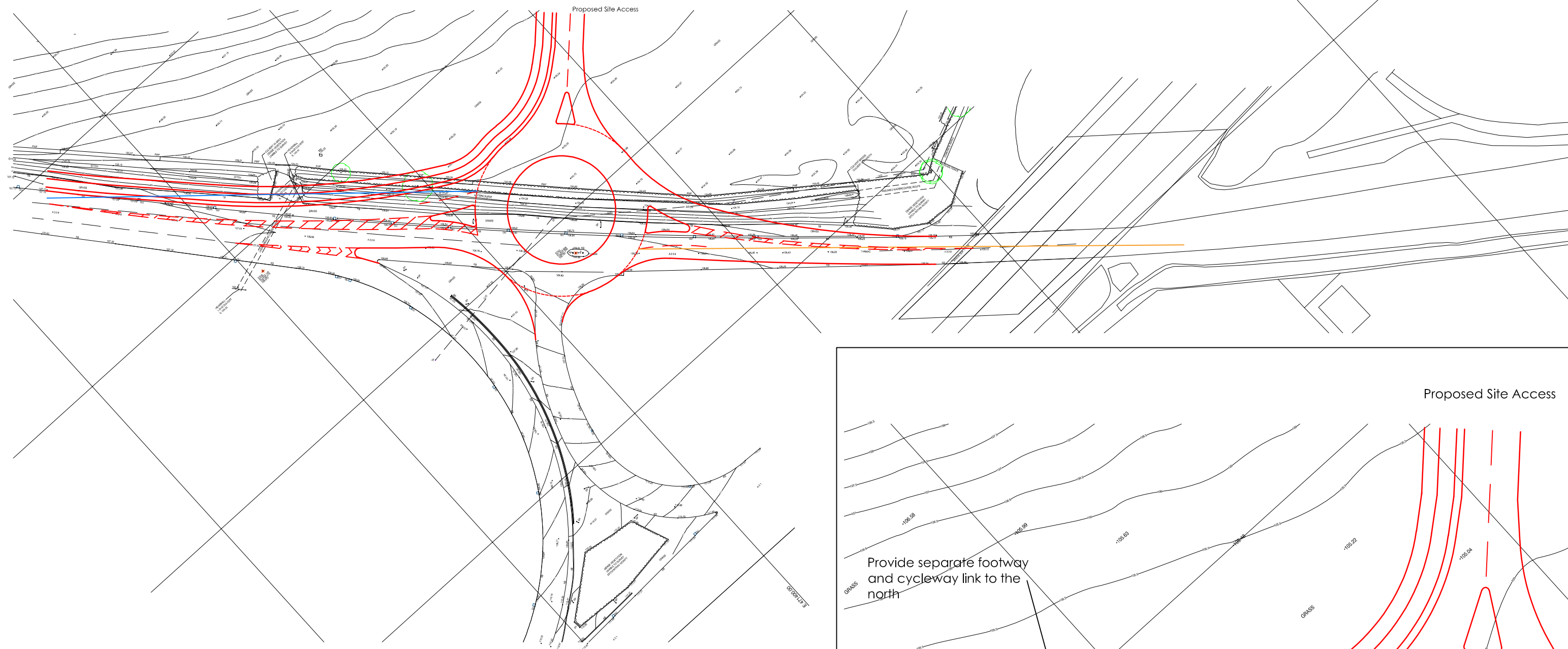
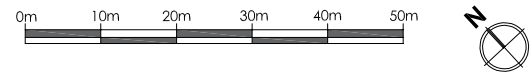
This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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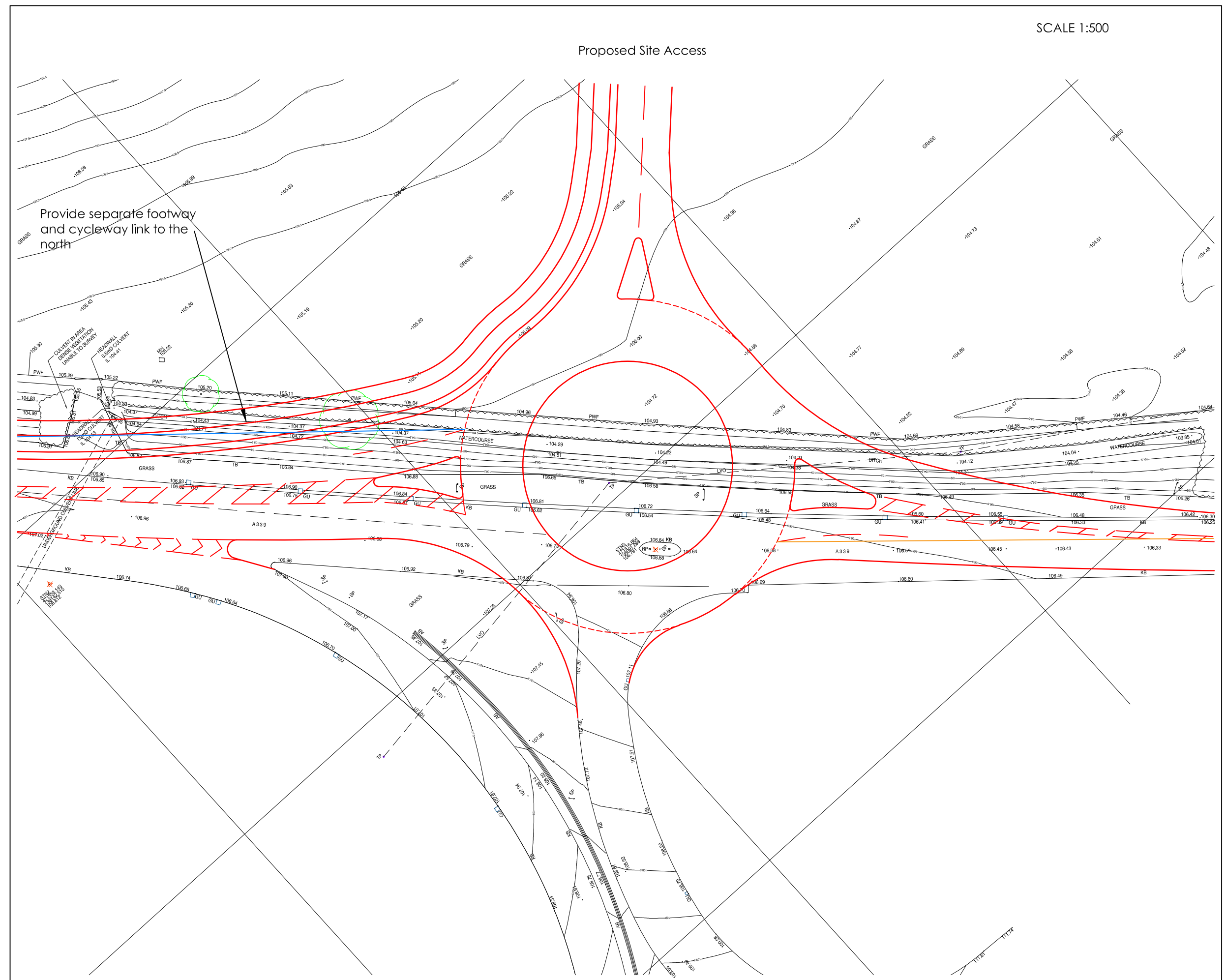


# Drawings

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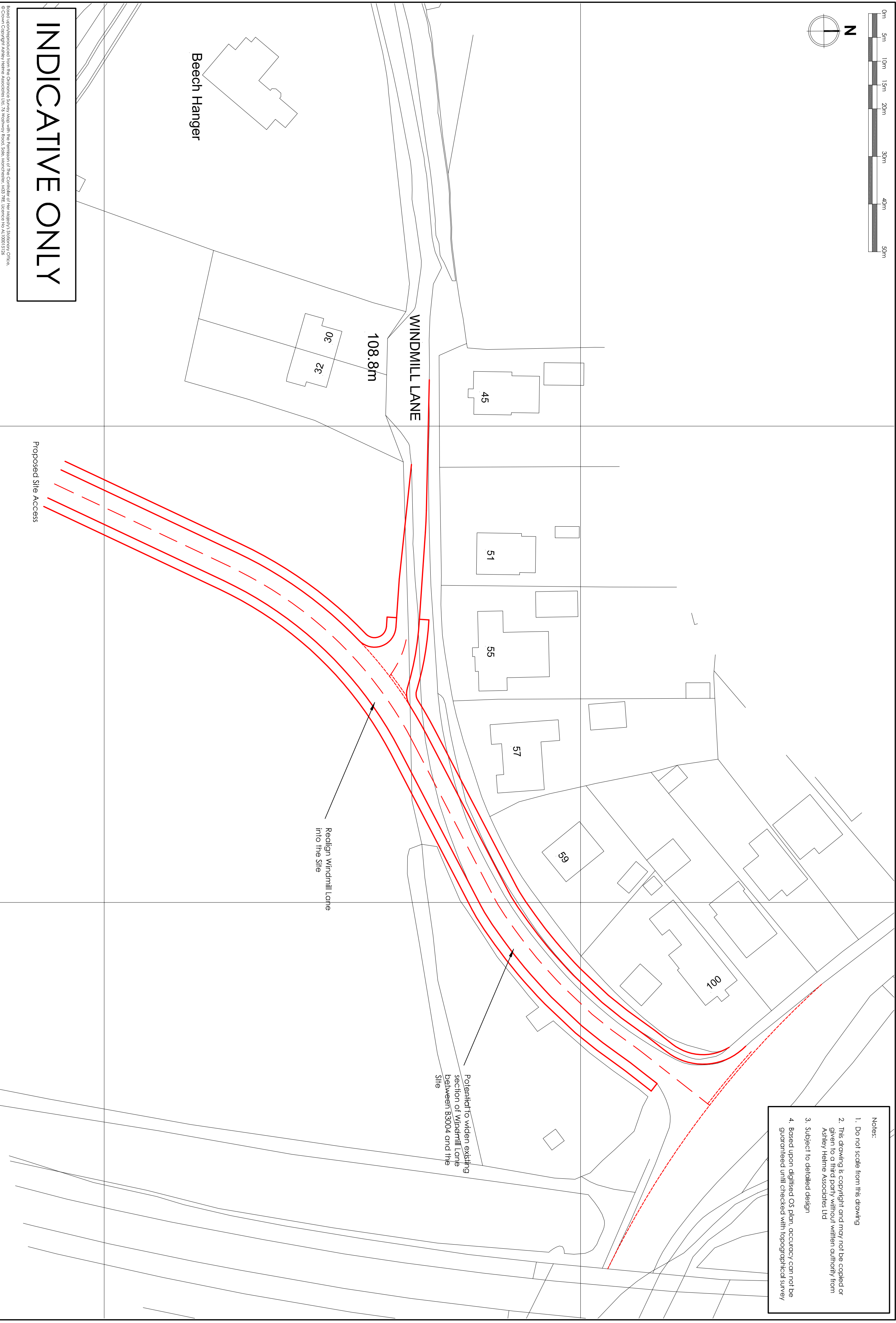
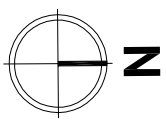
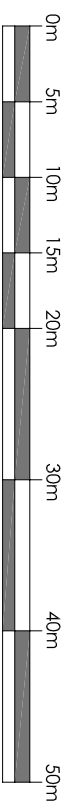


- Key:
- 112m stopping sight distance
  - 142m stopping sight distance
  - Proposed kerline
  - Proposed road markings
  - Existing road markings

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Client	RUBIX LAND	Date	FEBRUARY 2024	Scale	1:1000@A2				



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Project  
**ALTON, HAMPSHIRE**  
 Client  
**M7 PLANNING**

Title  
**INDICATIVE ACCESS OPTION: WINDMILL LANE**

Dwg No.	1854/04	Rev	
Date	JANUARY 2023	Scale	1:500@A2

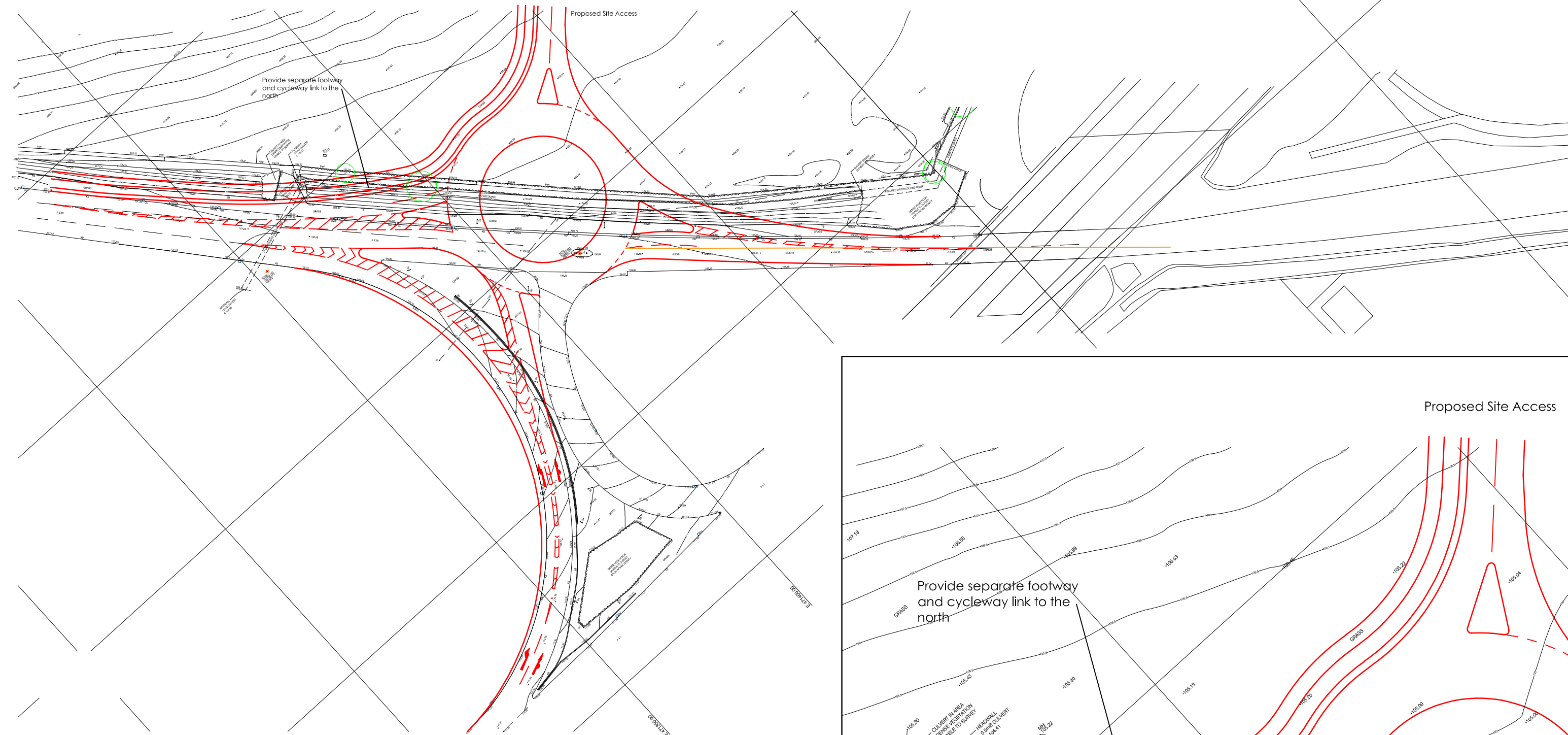


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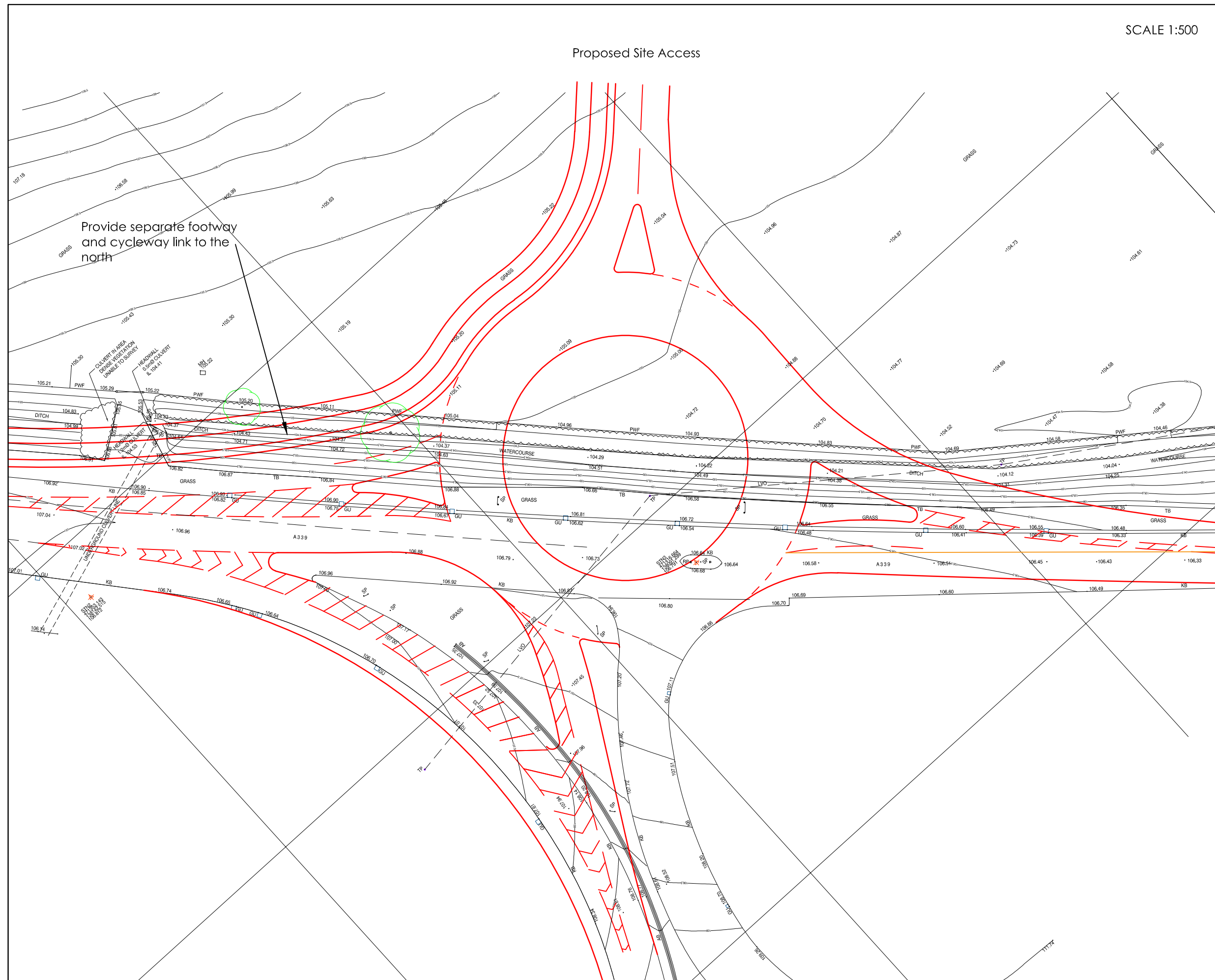
0m 10m 20m 30m 40m 50m



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SCALE 1:500



Key:

- 112m stopping sight distance
- 142m stopping sight distance
- Proposed kerbline
- Proposed road markings
- Existing road markings

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Client RUBIX LAND		Date FEBRUARY 2024	Scale 1:1000@A2	

## **Appendix 4**

### **Landscape and Visual Analysis**

# DAVID JARVIS ASSOCIATES

RUBIX LAND LTD.

LAND SOUTH OF ALTON, HAMPSHIRE

LANDSCAPE AND VISUAL ANALYSIS AND STRATEGY

MARCH 2024



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**CLIENT:** Rubix Land Ltd

**PROJECT:** Land south of Alton, Hampshire

**REPORT TITLE:** Landscape and Visual Analysis and Strategy

**DJA Reference:** 3094-4-4-4-S0-P1.1

**Report Number:** T1

**Revision:** P1

**Issue Date:** February 2024

#### REPORT REVISIONS

Revision	Date	Description	Prepared	Approved
P1.1	27.02.2024	First Draft	MCG	AS
P1.2	06.03.2024	Final	MCG	AS

**CONTENTS:**

**1. INTRODUCTION ..... 5**  
    General..... 5  
    Scope..... 5  
    Limitations..... 5  
    Study Area..... 5

**2. BASELINE CONDITIONS ..... 6**  
    Description of the Site and surroundings..... 6

**3. PLANNING POLICY .....10**

**4. LANDSCAPE AND VISUAL ANALYSIS .....12**

**5. LANDSCAPE IMPACTS ON THE DEVELOPMENT OF THE SITE COMPARED WITH THE NEATHAM MANOR FARM SITE .....13**

**6. LANDSCAPE STRATEGY .....14**

**7. CONCLUSIONS .....15**



**Figures:**

1. Site Location Plan
2. Landscape Character
3. Landscape Value
4. Public Rights of Way (ProW)
5. Topography
6. Zone of Theoretical Visibility
7. Viewpoint Location Plan
8. Landscape Analysis
9. Landscape Strategy

**Appendices**

1. Field Survey Record Sheets (DJA, February 2024)

## 1. INTRODUCTION

### General

- 1.1 This report has been prepared by David Jarvis Associates Limited (DJA). DJA is instructed by Rubix Land Ltd. (Rubix) to provide preliminary landscape and visual analysis and advice for land located to the south of Alton, Hampshire (“the Site”).
- 1.2 DJA is a firm of chartered landscape architects and town planning consultants established in 1982 and has extensive experience in the planning, assessment, design, and implementation of residential development. The firm is a Registered Practice of the Landscape Institute.

### Scope

- 1.3 This report appraises the Site and provides commentary on constraints, opportunities and landscape analysis to inform a landscape strategy for its promotion. The report also includes a comparison between the candidate Site and the proposed allocation at Neatham Manor Farm which is located to the east of Alton on the south-eastern edge of the A31.

### Limitations

- 1.4 The preliminary visual analysis which accompanies this note provides a broad overview of the visibility of the Site and does not constitute a full landscape and visual assessment. Comprehensive visual analysis would be required which would form part of a full Landscape and Visual Impact Assessment (LVIA), which is recommended at the Outline application stage.
- 1.5 A field survey was carried out by DJA on 20 February 2024. This survey updated the photography and analysis carried out by DJA in the summer of 2022 and provides an up-to-date overview of the visibility of the Site and the local landscape conditions.
- 1.6 A total of 31 viewpoints were selected for the survey, 22 of which accompany this report at **Appendix 1** to represent the degree of visibility of the Site from surrounding visual receptors.
- 1.7 A representative selection of viewpoints has been provided, however not all locations from where the Site is likely to be visible have been assessed and no private land (other than the Site) has been accessed during fieldwork.
- 1.8 Photography was carried out during the winter and thus presents a “worst case” scenario in terms of visibility of the Site. It should be noted that conversely, during the summer with trees, hedgerows and vegetation in full leaf, visibility of the Site is likely to decrease.

### Study Area

- 1.9 The study area for the assessment was initially informed by a desktop study to determine the likely instances of visibility of the Site from surrounding publicly accessible receptors. The study was subsequently refined during the field survey.
- 1.10 The study area is broadly defined by Windmill Lane immediately to the north of the Site, Neatham Down and Monk Wood to the north-east, East Worldham to the east, West Worldham to the south-east, Upper Farringdon to the south and St. Swithun’s Way to the south-east in the vicinity of Upper Woodside Farm.
- 1.11 Fieldwork has established that there is no visibility of the Site from publicly accessible receptors within the residential areas of Alton to the north owing to intervening buildings and trees.

## 2. BASELINE CONDITIONS

### Description of the Site and surroundings

- 2.1 A Site Location Plan is provided in **Figure LV-0001**. The Site comprises a number of fields which are predominantly under arable management and are located between the southern edge of Alton and the A31 dual carriageway (the Alton bypass). The fields are defined and separated by hedgerows, many of which contain hedgerow trees. Some of the hedgerows, particularly those bounding Water Lane and along parts of the A31, are fragmented and exhibit large gaps.
- 2.2 The Site occupies an area totalling approximately 18 hectares (ha) and forms part of an eastern/south-eastern facing slope which sits at between approximately 125m Above Ordnance Datum (AOD) and 110m AOD.
- 2.3 Land to the north of the Site increasingly ascends to a maximum height of 151m AOD. A rectangular deciduous copse, located on a small plateau (known as Windmill Hill) is a feature of interest in the local landscape.
- 2.4 The landscape to the north of the Site which includes the copse is agricultural and comprises a single field defined by good quality hedgerows. A narrow belt of trees runs between the fields and the developed land on the southern edge of Alton. Borovery Business Park, which contains small and medium sized commercial/agricultural buildings, lies on the northern edge of the Site and is accessed from Borovery Lane.
- 2.5 Recently completed residential development centred on Thistledown Way extends to the north-east from the A339 towards the north-western edge of the Site.
- 2.6 The local landscape beyond the A31 to the east of the Site is rural and agricultural and comprises irregularly-shaped fields defined by hedgerows. The landscape is traversed by a network of public rights of way (PRoW) including the long distance and promoted footpath Writers' Way trail.
- 2.7 Land to the south of the Site is characterised by agriculture and comprises pastoral and arable fields separated by hedgerows. Settlement is limited to farm complexes such as Green Barn Farm and agricultural buildings and private residences such as Westbrook Grange. A number of named and unnamed deciduous copses are located further to the south.
- 2.8 Land to the west of the Site, beyond the A339, is developed and predominantly comprises residential development, bisected by the Watercress Line (the railway line between Alton and Winchester).
- 2.9 The A31, a major transport corridor connecting Guildford (north-west) and Winchester (south-east), located immediately beyond the south-eastern boundary of the Site is a prominent aural detractor reducing tranquillity in and around the Site owing to the movement of high volumes of traffic. Other major roads in the study area include the A339 which extends to the north-west from a grade separated junction with the A31 and continues to the north-west bisecting the south-western edge of Alton. The B3004 and the B3006 extend to the south-east from the A31. The A32 (Gosport Road) aligns to the south from a roundabout to the west of Chawton village towards Lower Farringdon. A network of minor roads and lanes are located beyond the A31 and connect small rural settlements.
- 2.10 The Site lies within the jurisdiction of East Hampshire District Council.

### Designations

- 2.11 The Site is not subject to any statutory or non-statutory landscape designations. The boundary of the South Downs National Park is located approximately 0.5km to the south-west of the Site to the south of the A31.

### Public Rights of Way (PRoW)

2.12 The Site contains the following PRoW:

- Footpath 002/53/2 which aligns to the south from the southern edge of Alton and then to the north-east inside and parallel to the Site's northwestern boundary;
- Footpath 002/51/1 which aligns to the south from the southern edge of Alton runs along part of the north western boundary of the site and connects with footpath 002/50c/3;
- Footpath 002/50c/3 which aligns to the southeast from the southern edge of Alton, bisects the site and crosses the A31 via an overbridge;
- Footpath 002/49a/2 which aligns broadly to the south, then to the southeast of Alton, bisects the site and crosses the A31 via an overbridge to connect with footpath 002/49a/4; and
- Bridleway 002/48/1 (Water Lane) which continues to the southeast from Windmill Lane, bisects the site and crosses the A31 via an overbridge.

### Leisure and Recreation

2.13 Worldham Park Golf Club occupies a site to the east of the A31 and to the south of the B3004. The field survey has established limited visibility of the Site from the golf course owing to the screening effect of hedgerows and trees associated with the course of the A31.

### Nature Conservation Assets

2.14 The closest designated nature conservation assets are located to the east of the small settlement of West Worldham, outside of the study area.

### Heritage Assets

2.15 The Site is absent of any heritage assets by designation. The closest heritage assets to the Site are:

- Kiln House, Grade II, located approximately 180m to the southeast; and
- Truncheaunts and a dovecote, Grade II, located approximately 350m to the southeast;

2.16 There is a cluster of listed buildings, principally Grade II but including the Grade II\* listed Westbrooke House, to the north-west of the Site within the centre of Alton. Listed buildings are also present in the villages to the east of the site including those at Wyck, East Worldham and West Worldham and within Chawton to the south-west. Fieldwork has established that there is no intervisibility between these buildings and the Site owing to intervening

2.17 The closest Scheduled Monuments (SM) to the site are:

- A hillfort on King John's Hill, located approximately 3km to the east/south-east;
- A Roman villa southwest of Wyck Place, approximately 3km northeast; and
- A Medieval settlement at Hartley Mauditt, approximately 2.7km south-east.

### Associations

2.18 The area is associated with the novelist Jane Austen whose former residence comprised a cottage in the village of Chawton in the early 19<sup>th</sup> century. The cottage is open to the public and is a tourist

attraction. Writers' Way, a long distance promoted trail within the study area, is named after Austen, and two other authors Gilbert White and William Corbett.

### Landscape Character

2.19 The Site is located within the "Downland Mosaic Large Scale" Landscape Character Type (LCT), in the Hampshire Integrated Landscape Character Assessment. The key characteristics of this LCT are described as:

- *"A Downs landscape which has moderately heavy soils and more clay soil content than in Open Downs landscapes;*
- *Can have mini scarps which are individually identified in some local assessments;*
- *Large scale character influenced by rolling topography, medium to large size fields, fewer wooded hedges than the small scale type and can have large woodland blocks;*
- *Large blocks of ancient woodland and varied height hedgerow network which contrasts with areas of more open predominantly arable fields;*
- *Deeply rural quiet landscapes with sense of space and expansiveness uninterrupted by development the large woodland blocks add to the sense ruralness and of an undeveloped landscape;*
- *Low density road and lane network where this type occurs in mid and west Hampshire –higher density further east;*
- *A mosaic of land uses and management; arable dominated but also with permanent pasture, sites managed for biodiversity objectives, public access, woodland and field margins managed for game;*
- *Association with open access areas under CRow Act on small scarps, downland and woodland;*
- *Generally the archaeological evidence suggests these are peripheral landscapes to farmed and settled areas pre Roman with the odd exception as in the South East Hampshire Downs;*
- *Greater proportion of regular pattern late enclosure medium to large fields than the Downland Mosaic Small Scale landscapes apart from East Hampshire;*
- *Possible association with historic parks and garden and large estates;*
- *Mixed age of farmsteads with a higher proportion of 17th C / medieval than the Open Downs but not as high as the Small Scale Downland type; and*
- *Constantly changing views with panoramas from high points across undulating downs to river valleys and more constrained along dry valleys."*

2.20 The Site lies within the constituent "Wey Valley" Landscape Character Area (LCA) (3f). The key characteristics of this LCA are described as:

- *"Broad valley with smooth undulating valley sides through which the River Wey flows;*
- *Distinct flat valley floor with permanent pasture, wet woodland, water meadows and open water;*

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

2.21 Section 7.4 for the LCA assessment identifies the following threats and opportunities with regard to the *"Open views across the Wey valley from the northern valley slopes with clear uninterrupted ridges and skylines and importance of the chalk bluffs backdrop."*:

#### Threats

- *"Potential of the vulnerability of open uninterrupted skylines to tall vertical structures which break the flow of the landscape and undermine the scale of the valley.*
- *Sensitivity of high visibility of changes on the valleys sides and potential for inappropriate or visually intrusive development and woodland felling."*

#### Opportunities

- *"Target agri-environment and other grant schemes in order to; encourage traditional woodland management (thinning, coppicing, replanting) to ensure typical wooded backdrop to valley sides and overlapping pattern of vegetation is retained;*
- *Encourage new planting with species indigenous to the area, and of local provenance;*
- *encourage strategic woodland planting on valley sides to mitigate the impact of pylons to the south without significant alternation to the character of the valley; and*
- *Take into account and identify the main exposed ridges and downland in new development proposals (particularly development of vertical structures) and the main visual receptor sites - local opinions could be sought for particularly valued views."*

### 3. PLANNING POLICY

#### National Planning Policy Framework (NPPF, December 2023)

- 3.1 At the heart of the NPPF is a presumption in favour of sustainable development. The natural and local environment is addressed under Section 15 'Conserving and Enhancing the Natural Environment'.
- 3.2 Paragraph 180 states that *"planning policies and decisions should contribute to and enhance the natural and local environment by:*
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
  - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
  - c) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and*
  - d) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans."*

#### East Hampshire and South Downs National Park Joint Core Strategy (JCS)

- 3.3 The Joint Core Strategy (JCS) between East Hampshire District Council and South Downs National Park was adopted on 26<sup>th</sup> June 2014. The JCS contains the following planning policy which is relevant to the development of the Site:

#### **Policy CP 20: Landscape**

*"The special characteristics of the district's natural environment will be conserved and enhanced. New development will be required to:*

- a) conserve and enhance the natural beauty, tranquillity, wildlife and cultural heritage of the South Downs National Park and its setting, and promote the opportunities for the understanding and enjoyment of its special qualities, and be in accordance with the ambitions within the emerging South Downs Management Plan;*
- b) protect and enhance local distinctiveness sense of place and tranquillity by applying the principles set out in the district's Landscape Character Assessments, including the Community/Parish Landscape Character Assessments;*
- c) protect and enhance settlements in the wider landscape, land at the urban edge and green corridors extending into settlements;*
- d) protect and enhance natural and historic features which contribute to the distinctive character of the district's landscape, such as trees, woodlands, hedgerows, soils, rivers, river corridors, ditches, ponds, ancient sunken lanes, ancient tracks, rural buildings and open areas;*
- e) incorporate appropriate new planting to enhance the landscape setting of the new development which uses local materials, native species and enhances biodiversity;*

- f) maintain, manage and enhance the green infrastructure networks (see Policy CP28 Green Infrastructure). Priority will be given to working with landowners and others in order to ensure that land management practices improve public access to the countryside, conserve and enhance valued landscapes of major importance for wild flora and fauna, and restore landscapes where valued features have been lost or degraded.”*

#### **Policy CP 21: Biodiversity**

*“Development proposals must maintain, enhance and protect the District’s biodiversity and its surrounding environment. New development will be required to:*

- a) maintain, enhance and protect district wide biodiversity...*
- b) ...extend specific protection to, and encourage enhancement of, other sites and features which are of local value for wildlife, for example important trees... and hedgerows, but which are not included in designated sites.*
- c) contribute towards maintaining a district-wide network of local wildlife sites, wildlife corridors and stepping stones between designated sites and other areas of biodiversity value or natural green space. This will help to prevent the fragmentation of existing habitats and allow species to respond to the impacts of climate change by making provision for habitat adaptation and species migration. This is supported by Policy CP28 (Green Infrastructure) and the District’s Green Infrastructure work.*
- d) ensure wildlife enhancements are incorporated into the design to achieve a net gain in biodiversity by designing in wildlife and by ensuring that any adverse impacts are avoided where possible or, if unavoidable, they are appropriately mitigated for, with compensatory measures only used as a last resort.*
- e) protect and, where appropriate, strengthen populations of protected species;*
- f) protect and enhance open spaces in accordance with the District’s ‘Open Space, Sports and Built Facilities Study’, Policy CP17 (Protection of open space, sport & recreation) and Policy CP28 (Green Infrastructure). The provision of open space should be in advance of the relevant new developments being occupied.”*

#### **Policy CP 28: Green Infrastructure**

*“Development will be permitted provided that it maintains, manages and enhances the network of new and existing green infrastructure. Development will need to take forward the objectives and priorities presented in the District’s Green Infrastructure Study and Strategy, the South Hampshire Green Infrastructure Strategy and its Implementation Framework and the avoidance and mitigation measures set out in the Joint Core Strategy’s Habitats Regulations Assessment. Account will also need to be taken of other relevant joint core strategy policies such as landscape, historic environment, biodiversity, flood risk and design. New green infrastructure must be provided either through on-site provision or financial contributions. The size of contribution will be linked to the scale of the development and the resulting new green infrastructure must be located as close as possible to the development it is intended to serve.”*



## 4. LANDSCAPE AND VISUAL ANALYSIS

- 4.1 A landscape analysis plan is provided at **Figure LV-0008** and the field survey record sheets are provided at **Appendix 1**.
- 4.2 The Site forms part of a south/south-east facing slope which is broadly defined by the developed edge of Alton, the A339 the A31 and the B3004 (Wilsom Road). The topography of the Site is a characteristic feature of the wider study area.
- 4.3 The developed edge of Alton and the Site are visually separated owing to intervening topography and a robust tree line which defines the southern limit of settlement, whilst woodland on the northern edge of Windmill Lane prevents visibility of the Site from receptors such as Wilsom Road.
- 4.4 The greatest visibility of the Site is inevitably from receptors within and adjacent to its boundary. These are listed below:
- Footpath 002/49/4, on the northern boundary of the Site, (refer to **Viewpoint 1**)
  - Bridleway 002/48/1, coinciding with Water Lane in the north-eastern portion of the Site, (refer to **Viewpoints 2 and 3**);
  - Footpath 002/49/4, which bisects the eastern portion of the Site, (refer to **Viewpoint 4**);
  - Footpath 002/50C/5, which aligns to the north-west from the A31, (refer to **Viewpoints 5 and 11**);
  - Footpath 002/50C/2, which continues to the north from footpath 002/50C/5, (refer to **Viewpoint 6**); and
  - Footpaths 002/52/1 and 003/53/1 on the northern boundary of the Site, (refer to **Viewpoints 8 and 9**).
- 4.5 Fieldwork has also established that there is oblique visibility into the Site from sections of the A31 on the Site's southern boundary where the roadside hedgerows and vegetation have become fragmented (refer to **Viewpoint 10**).
- 4.6 Principal visibility of the Site outside its boundary (its visual envelope) extends to the south, beyond the A31 to include the private residences of Kiln House and Truncheaunts (Grade II listed and partially representative of views shown in **Viewpoints 17 and 18**), and the PRoW further to the south, namely from sections of public footpath 259/20/02 as demonstrated in **Viewpoints 15 and 16**. It should be noted, however, that visibility of the Site from these receptors is filtered and only part of the Site is visible.
- 4.7 Recreational users of Worldham Park Golf Club experience visibility of some parts of the Site as shown in **Viewpoint 19**.
- 4.8 This is also some oblique and filtered visibility of the Site from the B3006 in the vicinity of the entrance to Lumbry Park as shown in **Viewpoint 20**.
- 4.9 **Viewpoint 21** (within the boundary of South Downs National Park) and **Viewpoint 22** on the National Park's edge demonstrate that there is no visibility of the Site from these areas.
- 4.10 Fieldwork has established that there is no intervisibility between the Site and the listed buildings located in Chawton, including from Jane Austen's house, owing to intervening buildings and trees.

## 5. LANDSCAPE IMPACTS ON THE DEVELOPMENT OF THE SITE COMPARED WITH THE NEATHAM MANOR FARM SITE

- 5.1 The Neatham Manor Farm site is located to the east of Alton and immediately east of the A31. This site is a proposed allocation within the emerging East Hampshire Local Plan, to deliver around 1000 dwellings with associated community facilities, traveller site, public open space and landscaping.
- 5.2 As part of the Evidence Base for the emerging Local Plan, East Hampshire District Council has prepared an Integrated Impact Assessment (IIA). The IIA has carried out an assessment of each submitted housing site against a series of criteria such as accessibility, biodiversity and heritage. Landscape falls under IIA 9, the objectives of which are *“to conserve and enhance the character of the landscape and townscape”*. The decision-making criteria is as follows:
- *“Maintain and enhance the character of East Hampshire’s rural landscapes and settlements;*
  - *Respect the capacity of rural and edge-of-settlement landscapes to absorb new development;*  
and
  - *Protect and enhance the setting of the South Downs National Park and the Surrey Hills AONB.”*
- 5.3 Appendix F of the IIA provides a high-level assessment summary for each of the housing sites. The candidate Site is identified as ref: AL056 the development of which is assessed to have **Minor** negative landscape impact against the criteria above. By comparison, the Neatham Manor Farm site (ref: BIN-011) is assessed as having a **Strong** negative landscape impact.
- 5.4 Fieldwork carried out by DJA established that, whilst the Neatham Manor Farm site is low-lying and has strong transport links with immediate access to the A31, it is divorced from the existing settlement/development pattern of Alton. Alton is contained by the route of the A31, which forms a natural physical limit of potential development and benefits from intermittent sections of trees and vegetation. These could easily be reinforced as part of any development proposals to form a robust landscape buffer to prevent views of the developed candidate site.
- 5.5 By contrast, except for a relatively modest area of solar development located on the north of Caker Lane, the landscape to the east of the A31 is rural, undeveloped and characterised by agricultural fields separated by hedgerows and small pockets of woodland.
- 5.6 Development at the Neatham Manor Farm site would fail to respect the existing settlement pattern whilst potentially setting a precedent for the expansion of Alton beyond the A31 into open countryside.

## 6. LANDSCAPE STRATEGY

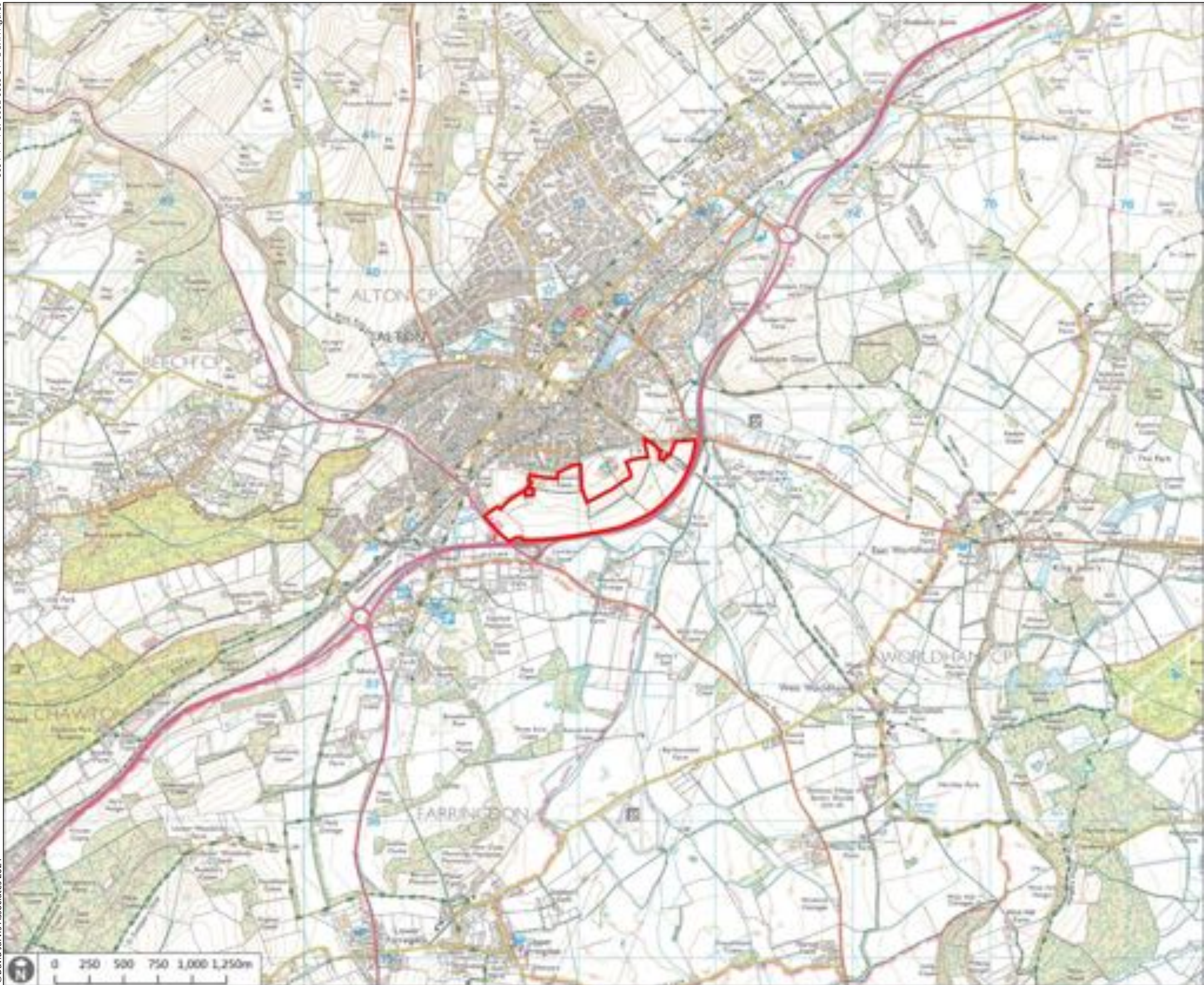
- 6.1 A landscape strategy plan is provided in **Figure LV-0009**. The strategy has been informed by the landscape and visual fieldwork and considers the opportunities for landscape enhancement identified in the published landscape character assessment profiles.
- 6.2 The key principles of the landscape strategy are landscape enhancement and to mitigate the visual effects of the proposed development from key receptors in the vicinity of the Site. Primary mitigation should be achieved by retaining (wherever possible) all peripheral and internal hedgerows. As some of the hedgerows are of poor quality, they should be enhanced with species of local provenance. The hedgerow enhancement will provide visual and ecological connectivity.
- 6.3 Development within the Site should be limited to at or below the 130m AOD contour. This would reduce the visual effects of the development in distance views and provide the opportunity for incidental tree planting/woodland on the undeveloped land on the northern part of the Site.
- 6.4 The higher density residential development should be located towards the southern edge of the Site, reducing towards the north as the land rises.
- 6.5 In order to reduce visibility of the developed Site from the identified key receptors to the south of the Site including the A31, Kiln House, Truncheaunts and PRow footpath 259/20/02, a landscape buffer comprising a robust belt of native woodland should be provided along the south/south-eastern boundary of the Site. As well as reducing visual effects of development on the Site the woodland buffer will provide landscape and ecological enhancement and will provide connectivity with the local hedgerow network.

## 7. CONCLUSIONS

- 7.1 This report prepared by DJA on behalf of Rubix provides preliminary landscape and visual analysis and advice for land located to the south of Alton, Hampshire.
- 7.2 The Site occupies an area of approximately 18 hectares (ha) and forms part of an eastern/south-eastern facing slope in the “*Downland Mosaic Large Scale*” LCT and the “*Wey Valley*” LCA. It comprises a number of fields separated by hedgerows, some of which are of poor quality.
- 7.3 Fieldwork carried out by DJA in February 2024 established that principal visibility of the Site is from sections of the A31 along its southern boundary, and local areas to the south of the A31 such as the in the vicinity of the private residences of Truncheanuts, Kiln House, Westbrook Grange and sections of public footpath 259/20/02. Some visibility of part of the Site is also experienced from the western fringes of Worldham Park Golf Club.
- 7.4 In terms of visibility of the Site from the South Downs National Park, this is limited to oblique and heavily fragmented views from the B3006 to the south of Westbrook Grange. There is no intervisibility between the Site and the landscape within the National Park further to the south and to the west, including from Chawton village, owing to the sequential screening effect of trees and buildings.
- 7.5 Whilst there is some distant (and often oblique) visibility of the Site from the PRow crossing the higher landscape to the north-east and to the east, views of the Site are generally limited to localised parts of its higher, northern portion.
- 7.6 With the prescribed landscape strategy in place, which includes inherent mitigation of limiting the upper extend of development and providing a robust landscape buffer along the southern and south-eastern edge of the Site, development of the Site could be assimilated successfully into the receiving landscape.
- 7.7 With regard to the proposed allocation at Neatham Manor Farm, DJA would agree with the conclusions of the Integrated Impact Assessment and agree that development in this location is likely to have a strong adverse impact on the landscape character of the area.

**Figures 1-9**





**KEY**

 Application Boundary

Status **DRAFT**

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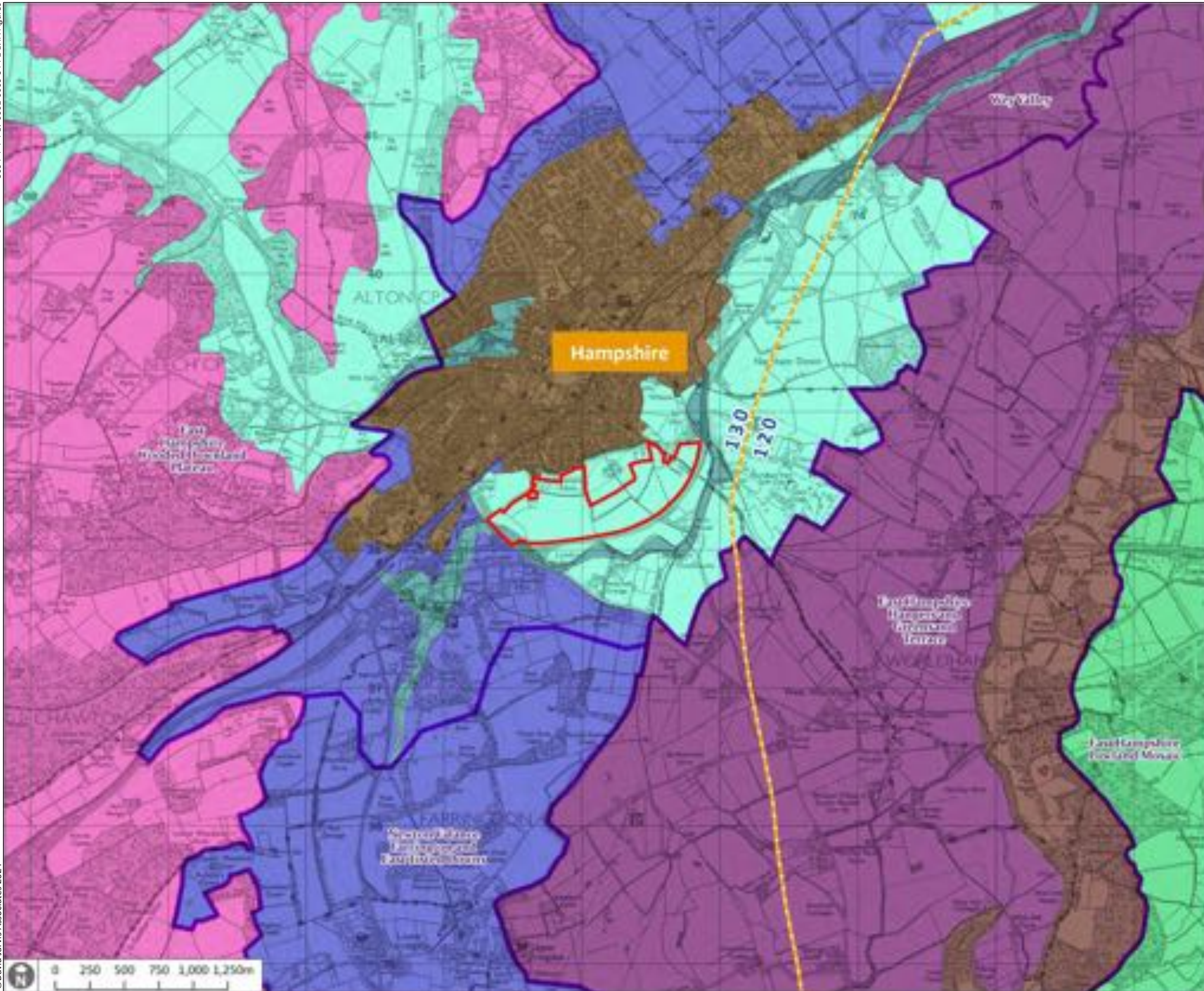
Client  
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Project  
**LAND SOUTH OF ALTON, HAMPSHIRE**

Drawing Title  
**SITE LOCATION PLAN**

Scale 1:25,000	Sheet Size A3	Date FEB 2024
Client Ref. -	Drawing Ref. 3094-4-4-4	Drawing No. LV-0001
		Version S4-P1





**KEY**

- Application Boundary
- County Boundaries

**National Character Areas**

- 120: Wealden Greensand (NE465)
- 130: Hampshire Downs (NES49)

**Landscape Character Areas**

- East Hampshire Hangers and Greensand Terrace
- East Hampshire Lowland Mosaic
- East Hampshire Wooded Downland Plateau
- Newton Valence Farrington and East Tisted Downs
- Wey Valley

**Landscape Character Types**

- Downland Mosaic Large Scale
- Downland Mosaic Small Scale
- Greensand Hangers
- Greensand Terrace
- Lowland Mosaic Medium Scale
- River Valley Floor
- TCA/TCT Boundary
- Wooded Downland Plateau

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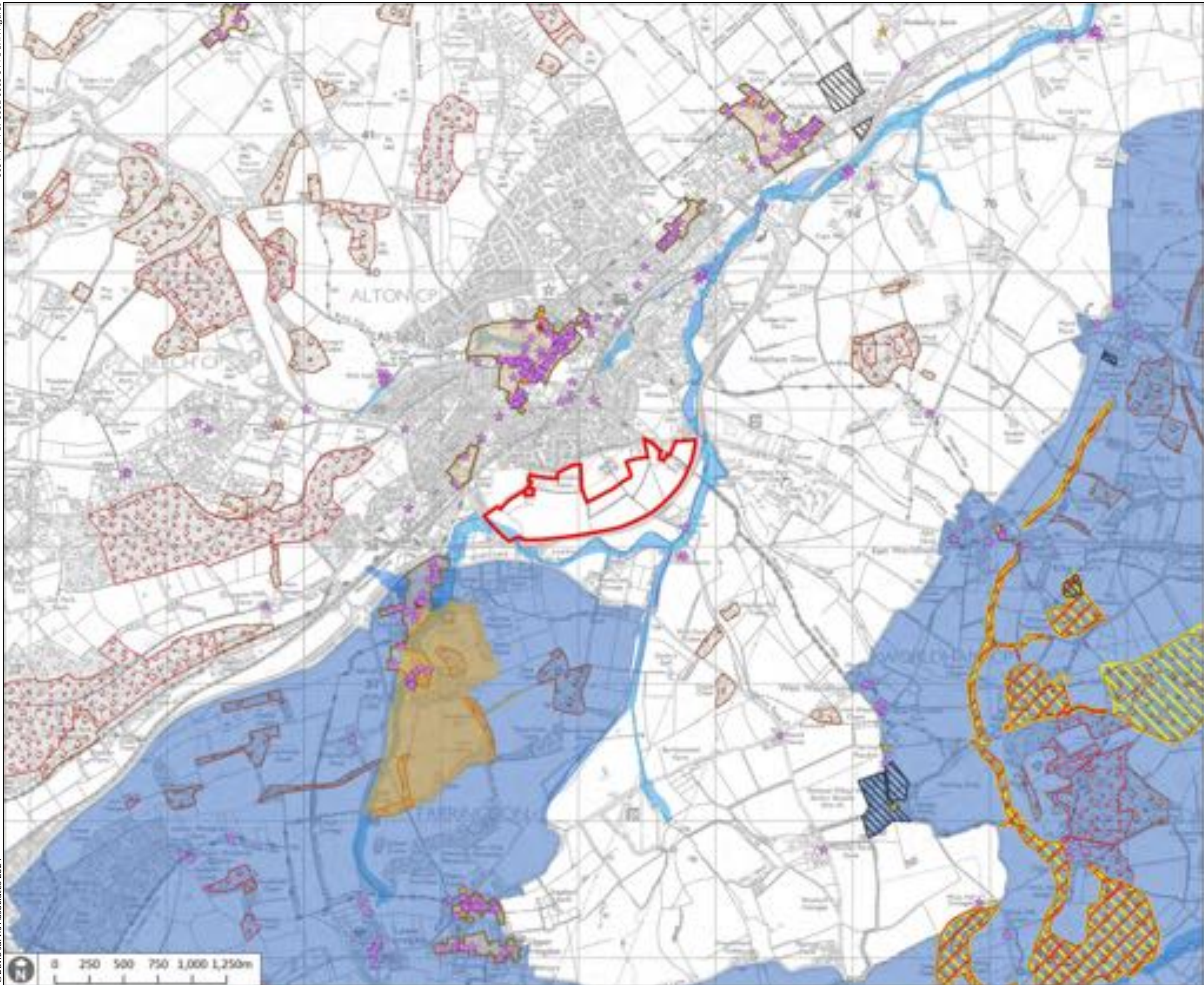
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Scale 1:25,000	Sheet Size A3	Date FEB 2024
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	Drawing No. LV-0002	





**KEY**

- Application Boundary
- National Heritage List for England**
- Listed Buildings
  - ★ I
  - ★ II
  - ★ II\*
- Scheduled Monuments
- Registered Parks and Gardens
- Natural England**
- Ancient & Semi-Natural Woodland
- Ancient Replanted Woodland
- Special Areas of Conservation
- Sites of Special Scientific Interest
- National Parks**
- SOUTH DOWNS
- Flood Zones**
- Flood Zone 3
- Flood Zone 2

Status **DRAFT**

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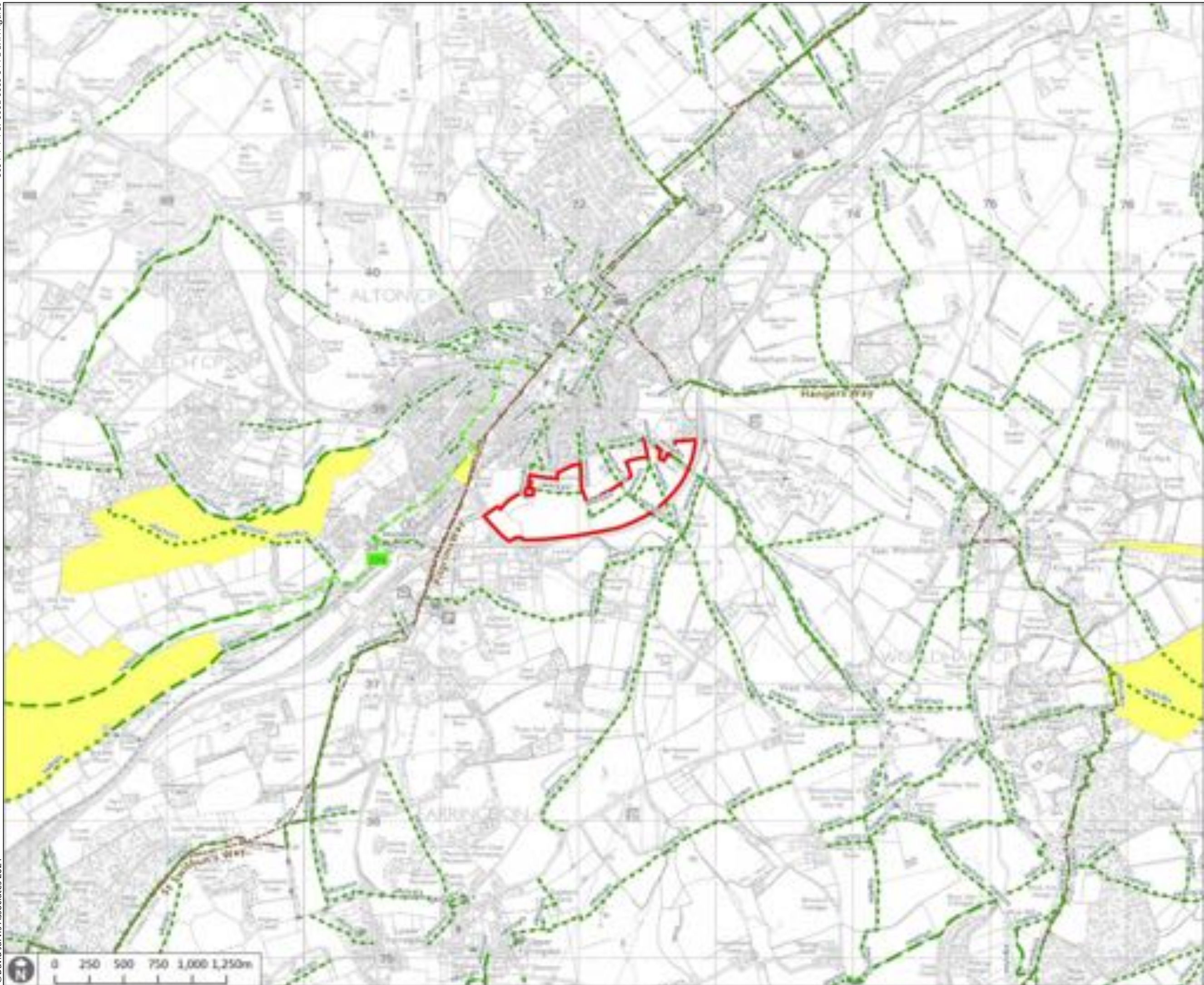
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Drawing Title  
**LANDSCAPE VALUE**

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Client Ref. -	Drawing Ref. 3094-4-4-4	Drawing No. LV-0003
		Version S4-P1





**KEY**

- Application Boundary
- PROW**
- + BOAT
- - - Bridleway
- - - - Footpath
- - - - - Restricted Byway
- - - - - - Long Distance Footpaths
- CRoW**
- Open Access Mapping Areas (CRoW Act 2000)
- CRoW Access Land

Status **DRAFT**

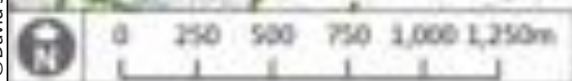
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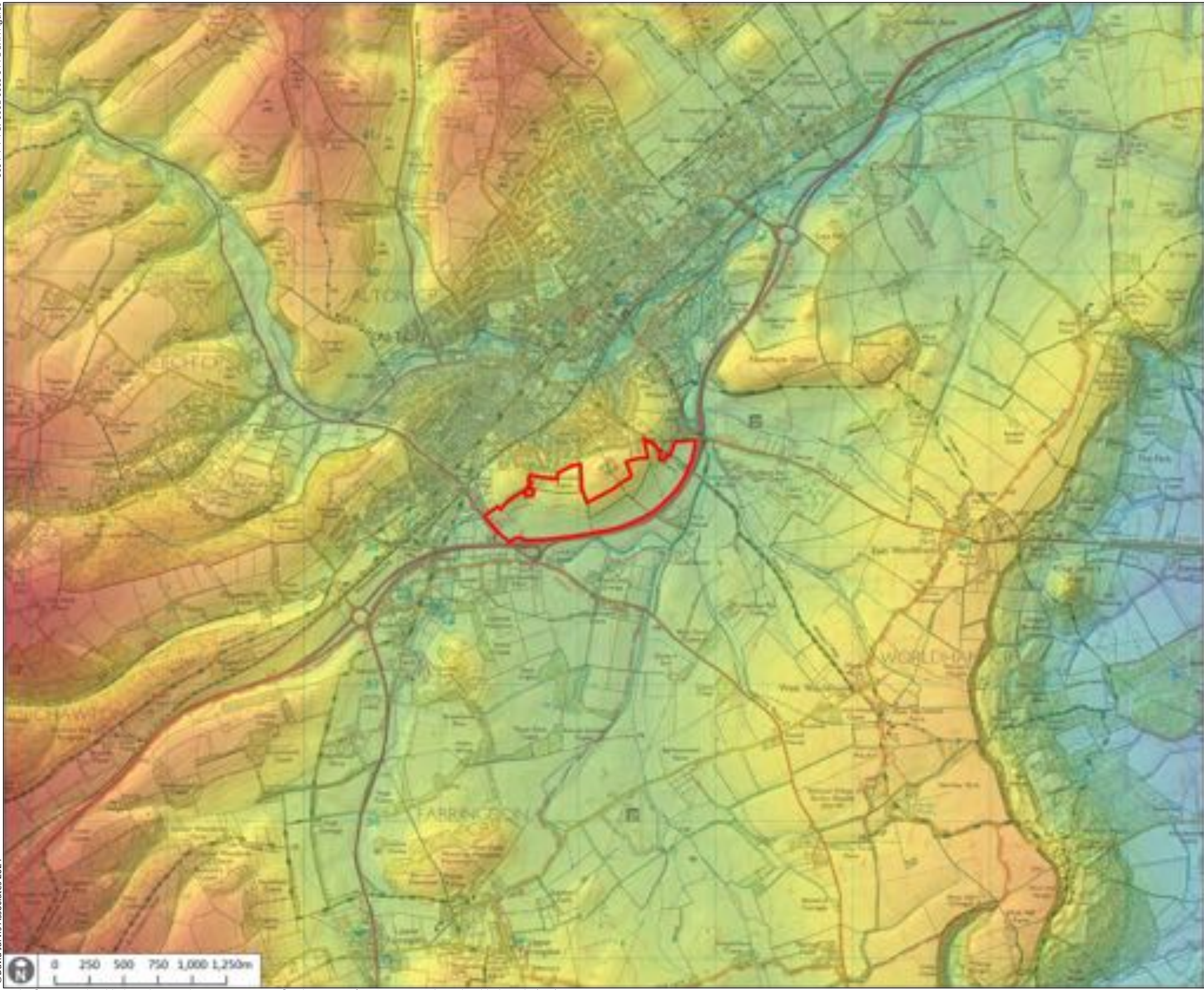
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Drawing Title  
**PUBLIC RIGHTS OF WAY (PROW)**


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Client Ref. -	Drawing Ref. 3094-4-4-4	Drawing No. LV-0004
		Version S4-P1








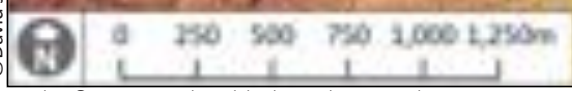
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**Value**

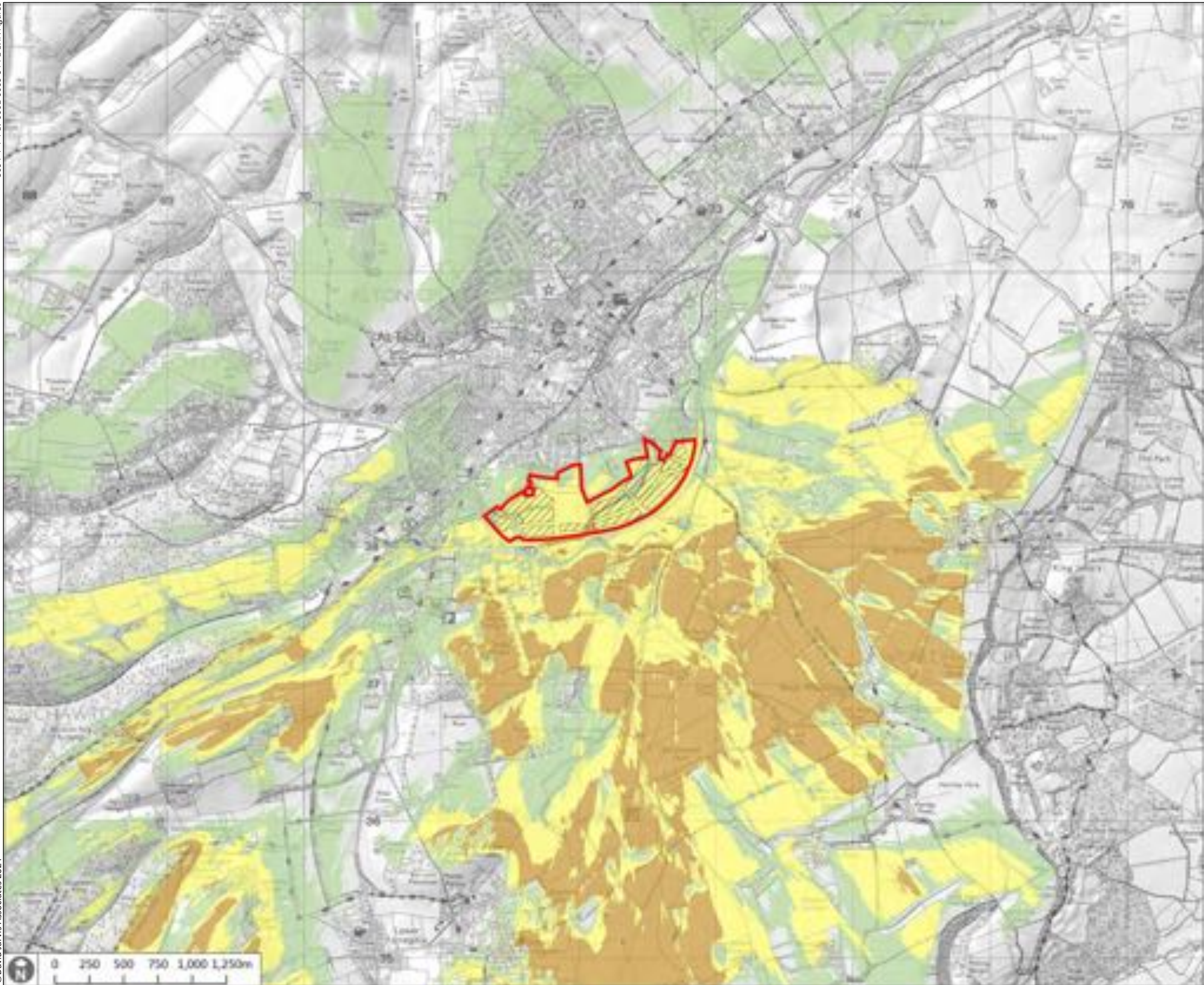
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Client Ref.	Drawing Ref.	Drawing No.	Version
-	3094-4-4-4	LV-0005	S4-P1





**KEY**

- Application Boundary
- Zones of Theoretical Visibility**
- Test area
- Low Visibility
- Medium Visibility
- High Visibility

The zones of theoretical visibility (ZTV) are shown for the proposed test.

The model takes account of built form and vegetation, based on LIDAR Digital Surface Model (DSM) at 2m intervals. The Zone of Visual Significance is defined during field survey.

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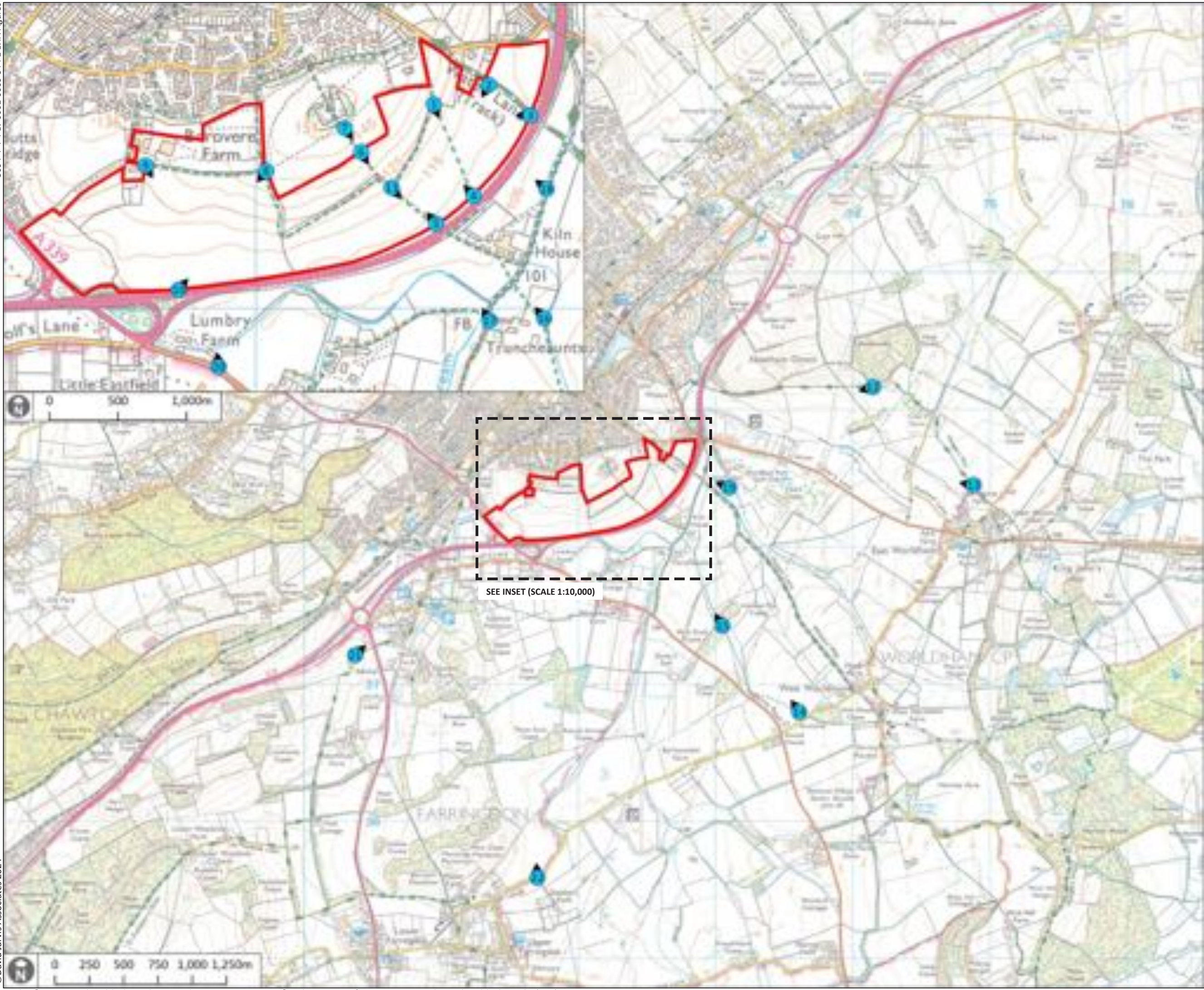
Client **RUBIX STRATEGIC LAND LIMITED**

Project **LAND SOUTH OF ALTON, HAMPSHIRE**

Drawing Title **ZONE OF THEORETICAL VISIBILITY (ZTV) - PROPOSED AT 8.0M HIGH**

Scale 1:25,000	Sheet Size A3	Date FEB 2024
Client Ref. -	Drawing Ref. 3094-4-4-4	Version S4-P1
	Drawing No. LV-0006	





**KEY**

- Application Boundary
- Field Survey Viewpoint Location

Status **DRAFT**

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Project  
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Drawing Title  
**VIEWPOINT LOCATION PLAN**

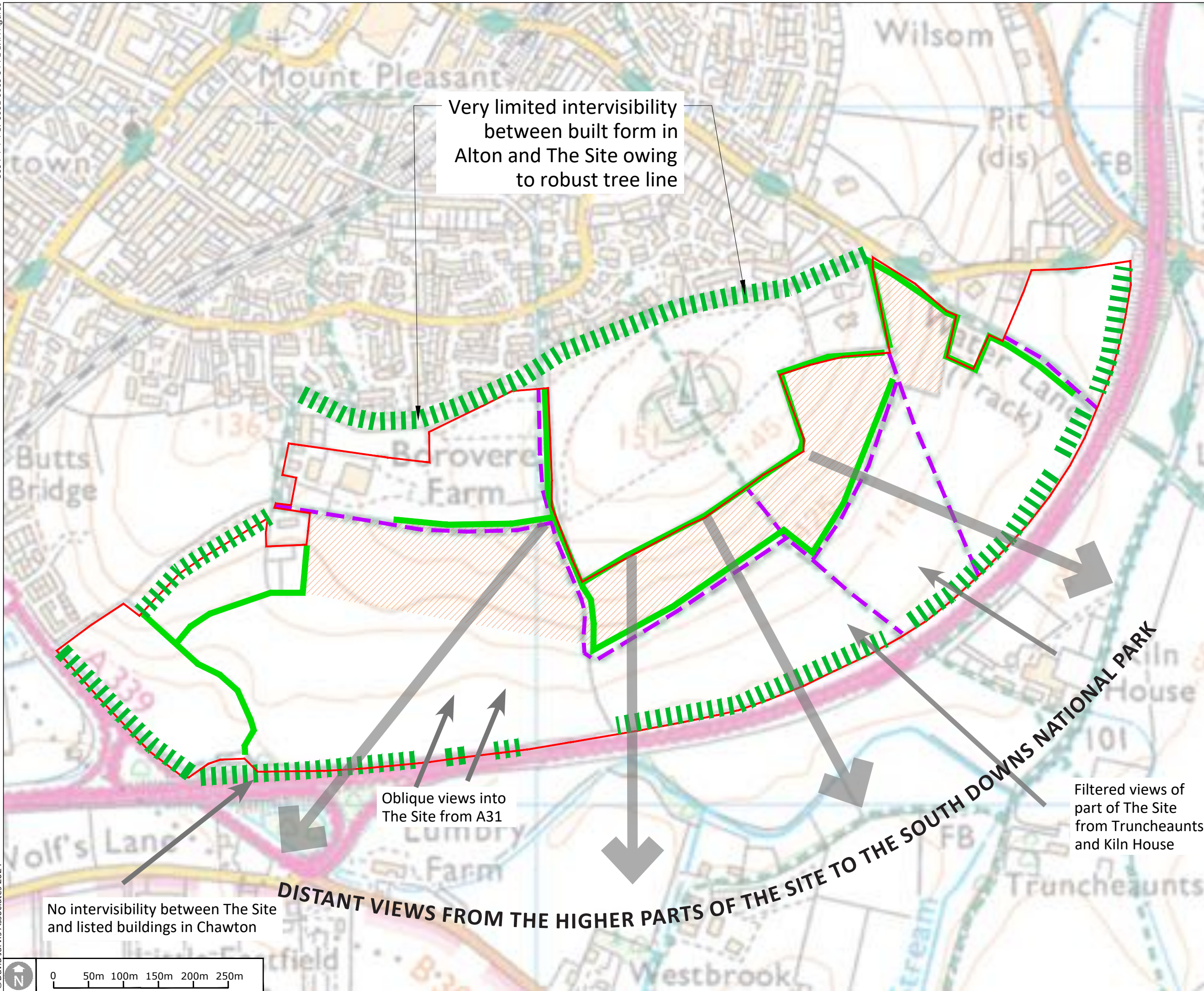
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		Version S4-P1



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**KEY**

- Boundary: Application Site
- Hedgerows
- Public Rights of Way within the Site
- Screening of The Site provided by trees and vegetation
- Visually most prominent part of The Site

Status **DRAFT**

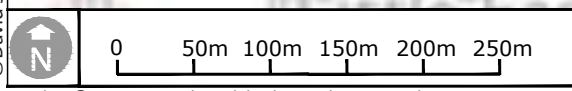
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Client **RUBIX STRATEGIC LAND LIMITED**

Project **LAND SOUTH OF ALTON, HAMPSHIRE**

Drawing Title **LANDSCAPE ANALYSIS**

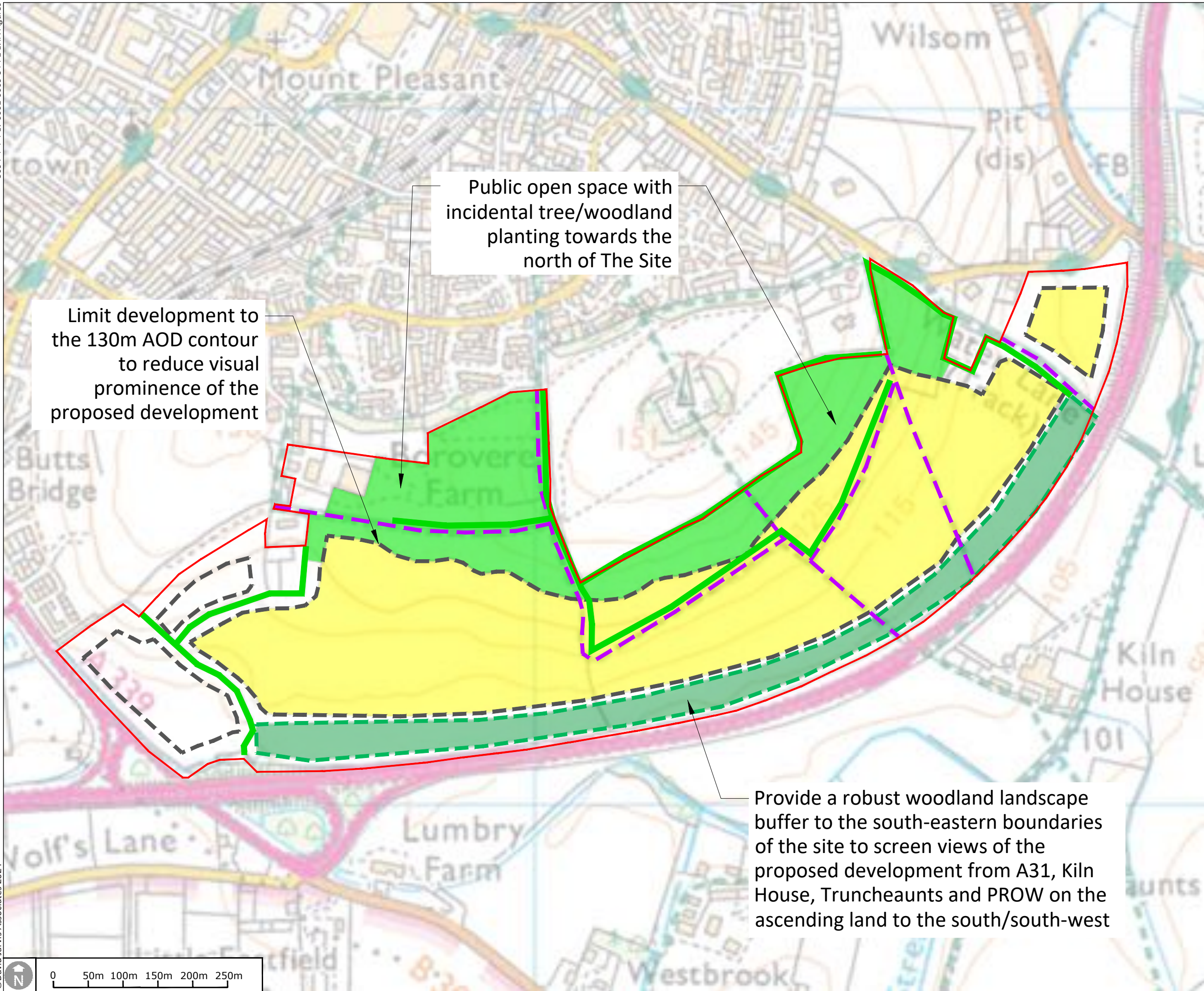
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Public open space with incidental tree/woodland planting towards the north of The Site

Limit development to the 130m AOD contour to reduce visual prominence of the proposed development

Provide a robust woodland landscape buffer to the south-eastern boundaries of the site to screen views of the proposed development from A31, Kiln House, Truncheants and PROW on the ascending land to the south/south-west

**KEY**

- Boundary: Application Site
- Internal and Peripheral Hedgerows (to be maintained and enhanced)
- Potential Development Areas, reducing in density towards the north
- Woodland Landscape Buffer
- Public Open Space with Incidental Trees and Woodland
- Public Rights of Way within the Site

Status **DRAFT**

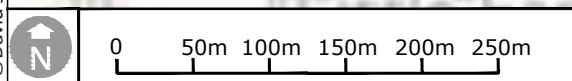
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Drawing Title **LANDSCAPE STRATEGY**

Scale 1:5,000	Sheet Size A3	Date FEB 2024
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		Version S4-P1



**Appendix 1**  
**Field Survey Record Sheets**  
(DJA, February 2024)







Approximate extent of site  
(continues beyond photographic extents)

Oblique visibility of  
site's north-eastern field

PROW Bridleway 002/48/1  
(Water Lane)

A31 Road  
(behind hedgerow)

Continued below

**Viewpoint 02 - View south from public bridleway 002/48/1 (Water Lane)**

Approximate extent of site  
(continues beyond photographic extents)

PROW Bridleway  
002/48/1  
(Water Lane)

**Viewpoint 02 - Continued**



**Viewpoint 02 details**

Grid Reference: E: 472679, N: 138653  
Altitude AOD: 35m  
Distance to Site: 00m  
Date: 20/02/2024  
Time: 10:38

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
Client: RUBIX STRATEGIC LAND LIMITED  
Drawing Ref & Title: 3094-4-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
APPENDIX 2 - SHEET 2 OF 17  
Date: FEB 2024

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Approximate extent of site  
(continues beyond photographic extents)

A31 Road  
(behind hedgerow)

Oblique visibility of  
site's north-eastern field

Continued below

**Viewpoint 03 - View west from public bridleway 002/48/1 (Water Lane)**

Approximate extent of site  
(continues beyond photographic extents)

PROW Footpath  
002/49/4

**Viewpoint 03 - Continued**



**Viewpoint 03 details**

Grid Reference: E: 472800, N: 138564  
Altitude AOD: 40m  
Distance to Site: 01m  
Date: 20/02/2024  
Time: 10:42

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
Client: RUBIX STRATEGIC LAND LIMITED  
Drawing Ref & Title: 3094-4-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
APPENDIX 2 - SHEET 3 OF 17  
Date: FEB 2024

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Approximate extent of site

Windmill Hill

A31 Road  
(behind hedgerow)



Continued below

**Viewpoint 04** - View north-west from public footpath 002/49/4 on the southern boundary of the site

Approximate extent of site

PROW Footpath  
002/49/4

A31 Road  
(behind hedgerow)



**Viewpoint 04** - Continued



**Viewpoint 04 details**

Grid Reference: E: 472634, N: 138330  
Altitude AOD: 52m  
Distance to Site: 02m  
Date: 20/02/2024  
Time: 10:46

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
Client: RUBIX STRATEGIC LAND LIMITED  
Drawing Ref & Title: 3094-4-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
APPENDIX 2 - SHEET 4 OF 17  
Date: FEB 2024

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Approximate extent of site

A31 Road  
(behind hedgerow)

PROW Footpath  
002/50C/5

Windmill Hill



Continued below

**Viewpoint 05** - View north-west from public footpath 002/50C/5 on the southern boundary of the site

Approximate extent of site



A31 Road  
(behind hedgerow)

**Viewpoint 05 - Continued**



**Viewpoint 05 details**

Grid Reference: E: 472525, N: 138249  
Altitude AOD: 60m  
Distance to Site: 00m  
Date: 20/02/2024  
Time: 10:50

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
Client: RUBIX STRATEGIC LAND LIMITED  
Drawing Ref & Title: 3094-4-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
APPENDIX 2 - SHEET 5 OF 17  
Date: FEB 2024

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Approximate extent of site



**Viewpoint 06** - View south from public footpath 002/50C/2 on the northern boundary of the site

Approximate extent of site



**Viewpoint 06 - Continued**



**Viewpoint 06 details**

Grid Reference: E: 472307, N: 138457  
Altitude AOD: 100m  
Distance to Site: 00m  
Date: 20/02/2024  
Time: 10:57

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
Client: RUBIX STRATEGIC LAND LIMITED  
Drawing Ref & Title: 3094-4-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
APPENDIX 2 - SHEET 6 OF 17  
Date: FEB 2024

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Monk Wood

No visibility of the site owing to intervening topography

PROW Footpath 002/50C/2

Distant visibility of the South Downs National Park



**Viewpoint 07** - View south from public footpaths 002/50C/2 at Windmill Hill

Approximate extent of site  
(continues beyond photographic extents)

PROW Footpath 002/52/1

A31 Road

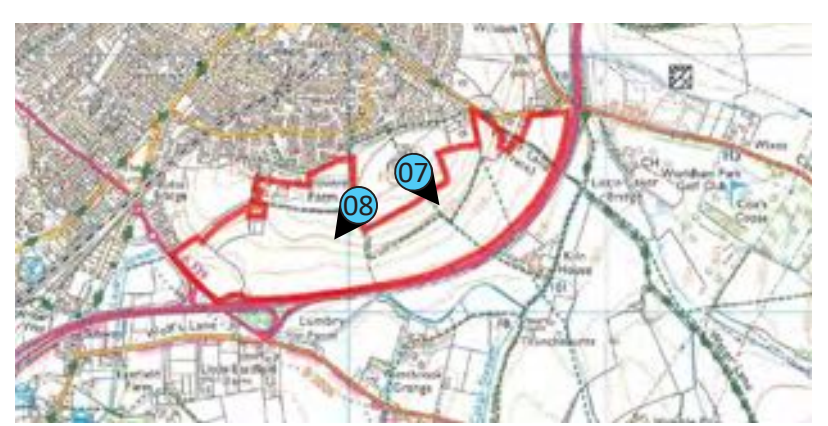
Westbrook Grange

Distant visibility of the South Downs National Park

PROW Footpath 002/53/1



**Viewpoint 08** - View south from the junction of public footpaths 002/52/1 and 002/53/1



**Viewpoint 07 details**

Grid Reference: E: 472258, N: 138527  
 Altitude AOD: 114m  
 Distance to Site: 81m  
 Date: 20/02/2024  
 Time: 10:59

**Viewpoint 08 details**

Grid Reference: E: 472030, N: 138402  
 Altitude AOD: 105m  
 Distance to Site: 00m  
 Date: 20/02/2024  
 Time: 11:04

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
 Client: RUBIX STRATEGIC LAND LIMITED  
 Drawing Ref & Title: 3094-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
 APPENDIX 2 - SHEET 7 OF 17  
 Date: FEB 2024

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Approximate extent of site

Borovere Farm

PROW Footpath  
002/53

Continued below

**Viewpoint 09** - View south-east from public footpath 002/53/1 adjacent to Borovere Farm

Approximate extent of site

A31 Road

**Viewpoint 09 - Continued**



**Viewpoint 09 details**

Grid Reference: E: 471678, N: 138418  
Altitude AOD: 99m  
Distance to Site: 00m  
Date: 20/02/2024  
Time: 11:11

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
Client: RUBIX STRATEGIC LAND LIMITED  
Drawing Ref & Title: 3094-4-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
APPENDIX 2 - SHEET 8 OF 17  
Date: FEB 2024

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Approximate extent of site  
(continues beyond photographic extents)



**Viewpoint 11** - View south from the junction of public footpaths 002/51/1 and 002/50C/5 in the centre of the site

Approximate extent of site  
(continues beyond photographic extents)



**Viewpoint 11 - Continued**



**Viewpoint 11 details**

Grid Reference: E: 472396, N: 138353  
Altitude AOD: 105m  
Distance to Site: 00m  
Date: 20/02/2024  
Time: 11:30

**Viewpoint 12 details**

Grid Reference: E: 474146, N: 139164  
Altitude AOD: 126m  
Distance to Site: 1352m  
Date: 20/02/2024  
Time: 12:15

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
Client: RUBIX STRATEGIC LAND LIMITED  
Drawing Ref & Title: 3094-4-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
APPENDIX 2 - SHEET 10 OF 17  
Date: FEB 2024

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**Viewpoint 11 - Continued**



**Viewpoint 12 - View south-west from public footpath 259/31/2 to the south-west of Monk Wood**



Viewpoint 11 details

Grid Reference:	E: 472396, N: 138353
Altitude AOD:	105m
Distance to Site:	00m
Date:	20/02/2024
Time:	11:30

Viewpoint 12 details

Grid Reference:	E: 474146, N: 139164
Altitude AOD:	126m
Distance to Site:	1352m
Date:	20/02/2024
Time:	12:15

Project	LAND SOUTH OF ALTON, HAMPSHIRE
Client	RUBIX STRATEGIC LAND LIMITED
Drawing Ref & Title	3094-4-4-4-AP-0002-S4-P1
	<b>PHOTOGRAPHIC FIELD SURVEY RECORD</b>
	<b>APPENDIX 2 - SHEET 11 OF 17</b>
Date	FEB 2024

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**Viewpoint 13** - View west from the junction of public footpath 259/35/1 (Hanger's Way long distance promoted trail) and public footpath 259/35/2 to the north of East Worldham on the edge of the South Downs National Park



**Viewpoint 14** - View north-west from public footpath 259/20/5 to the west of West Worldham



**Viewpoint 13 details**

Grid Reference: E: 474881, N: 138450  
 Altitude AOD: 136m  
 Distance to Site: 2053m

Date: 20/02/2024  
 Time: 12:39

**Viewpoint 14 details**

Grid Reference: E: 473609, N: 136798  
 Altitude AOD: 138m  
 Distance to Site: 1807m

Date: 20/02/2024  
 Time: 13:24

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
 Client: RUBIX STRATEGIC LAND LIMITED  
 Drawing Ref & Title: 3094-4-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
 APPENDIX 2 - SHEET 12 OF 17

Date: FEB 2024

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Filtered visibility of residences in Chawton

PROW Footpath 046/501/1

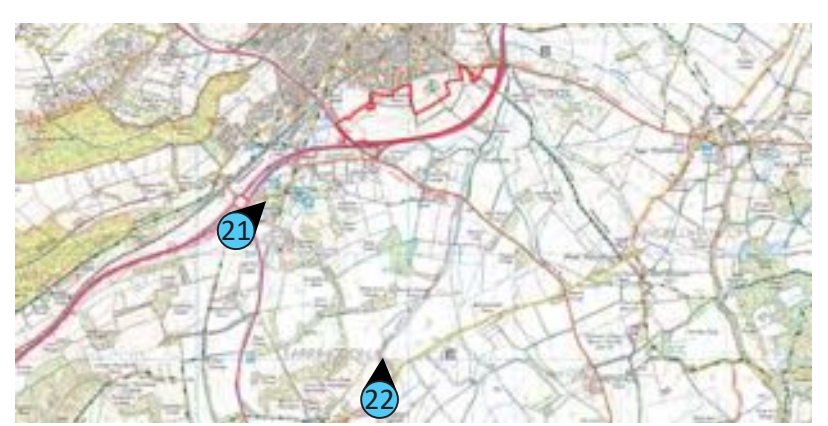


**Viewpoint 21** - View north-east from public footpath 046/501/1 to the south-west of Chawton within the Sotuh Downs National Park

Approximate direction of site  
(no visibility owing to intervening trees)



**Viewpoint 22** - View north-east from the unnamed lane to the north-east of Upper Farringdon on the edge of the South Downs National Park



Viewpoint 21 details

Grid Reference: E: 470372, N: 137213  
Altitude AOD: 115m  
Distance to Site: 1375m  
Date: 20/02/2024  
Time: 15:45

Viewpoint 22 details

Grid Reference: E: 471701, N: 135590  
Altitude AOD: 108m  
Distance to Site: 2461m  
Date: 20/02/2024  
Time: 16:24

Project: LAND SOUTH OF ALTON, HAMPSHIRE  
Client: RUBIX STRATEGIC LAND LIMITED  
Drawing Ref & Title: 3094-4-4-4-AP-0002-S4-P1  
**PHOTOGRAPHIC FIELD SURVEY RECORD**  
APPENDIX 2 - SHEET 17 OF 17  
Date: FEB 2024

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## **Appendix 5**

### **Phase 1 Drainage Strategy**

Our ref: 24060-L-001- Octavia Group

26<sup>th</sup> February 2024

[REDACTED]  
Octavia Group

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Web: <https://quadconsult.co.uk>

Dear [REDACTED]

## **RE: LAND NORTH OF A31 ALTON – DRAINAGE STRATEGY**

### Introduction

QuadConsult Limited have been appointed by the Octavia Group to provide a high-level drainage assessment and strategy for a proposed development off the A339 Selbourne Road just south of Alton, Hampshire.

### Existing Site

The site is 3.64 ha and open pasture in nature with a gated farm access off Selbourne Road. It is bounded on all sides by hedgerows and trees and falls at a typical gradient of 1:8 from the northeast to the south west, although levels are considerably lower in the southern corner. A formal ditch/watercourse runs in a south easterly direction at the base of the A339 highway embankment which drains the land parcel and is also a continuation of the Lavant Stream that passes beneath the main road from the west via a 1.2m diameter culvert. The topographical survey also indicates gully connections from Selbourne Road into the site ditch.

This ditch/watercourse exits the site in the southern corner via a 2.3m wide culvert.

### Flood Risk

A review of the Environment Agency Flood Risk Map confirms the lower portion of the site to fall into the medium (1% - 3.3% 1:100yr to 1:33yr) to high-risk category (3.3% - 1:33yr) Flood Zones 2 and 3, so any proposed development should lie outside of these zones.

A review of these maps when read in conjunction with the topographical survey would suggest that flooding is either potentially caused by the existing 2.3m wide culvert's inability to convey the flow through the site and/or Lavant Stream or, more likely, based upon a modelled full or partial blockage of the said culvert . Whilst no Environment Agency model data was made available at the time of writing this statement, it is apparent that the ground level at the higher extremity (circa 106.50m AOD) bears close correlation with the A339 road level.

This suggests that for the scenario where the culvert is completely blocked, surface water would overspill from the site onto the main A339.



[REDACTED]

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This assertion is supported further when examining the flood map below, where flows over carriageways (A339 and A31) are shown, presumably because of a modelled blockage or partial blockage of culverts passing beneath.



Taking all the above into consideration does however suggest that the flood levels within the site should never exceed that of the surrounding road levels which in effect act as broad crested weirs in the extreme event.

### Proposed Development

#### Access

It is understood that a new roundabout access is proposed off the A339 as shown on the Ashley Helme drawing 1854/05. This construction would require the introduction of culverts to maintain flows within the watercourse which also may require hydraulic modelling to simulate the effects of blockage for the extreme storm events.

Furthermore, the level differences between the site and adjacent carriageway will mean that any new embankment supporting the roundabout arm will, in effect, displace potential floodwaters that were previously accommodated within the site.

Consequently, some compensatory flood storage may need to be provided within the site to accommodate this, subject to detailed flood analysis and design.



Site Development

The remaining site area that forms the Zone 1 (little or no risk of flooding) has typical gradients of 1:9 so may require some grading or construction of plateau areas to assist with engineering design and remove requirements for multiple retaining structures, although this will largely depend on the final proposed site layouts.

Proposed Surface Water Strategy

Greenfield flows for the Zone 1 component have been calculated and appended to this letter report with a summary below:

<b>RETURN PERIOD</b>	<b>FLOW (l/s)</b>
Q1	3.83
Q30	10.36
Q100	14.37
Qbar	4.51

Surface Water Disposal will follow the hierarchy specified in the DCG, namely:

- surface water collected for re-use
- discharge to ground via infiltration
- discharge to watercourse
- discharge to a surface water sewer
- discharge to a combined sewer

Whilst no site investigations or geotechnical investigation is currently available, research into nearby developments has revealed that the underlying chalk strata maybe suitable for surface water disposal, either, as a solution in itself or as a secondary system when sat alongside a positive outfall to the watercourse. Infiltration rates in the region of  $1 \times 10^{-5}$  m/s have been recorded within the chalk on the nearby site, although these can vary with depth, geographical location and position of the water table.

Assuming an impermeable area of 70% of the Zone 1 parcel (circa 1.946 ha) surface water attenuation of approximately 1900m<sup>3</sup> would be required for the Q<sub>100</sub> + 40% CC storm event. Due to the challenging topography, this would best be located along contour as shown on the drainage strategy plan, possibly in the form of an elongated basin/conveyance ditch as shown although tanks could also be considered. A flow control would be fitted at the outlet limiting flows to a proposed 5 l/s. A swale outlet could be constructed down to the existing watercourse that would still function in the more extreme storm events as depicted on the strategy drawing.

Conveyance of runoff from the proposed development down to the attenuation basin would be via surface features such as swales wherever possible to assist with the removal of pollutants. SuDS features will be used extensively across the site in accordance with Design and Construction Guidance (DCG) Guidelines.

### Foul Water Disposal

Whilst no foul water drainage drawings were available at the time of writing, inspection of local maps confirm there to be residential development immediately to the northwest of the site which will typically be served by formal foul water drainage infrastructure. Due to distance and topography, a pumped solution from the site is currently proposed, subject to approval from the Local Water Authority.

Capacity checks at the receiving sewer and treatment plant will need to be undertaken.

### Conclusions and Recommendations

It is evident from the Environment Agency data available that the site is subject to flooding, approximately half the site area falling into the medium to high flood risk, with the mode of failure most likely to be caused by potential blockage of a culvert. Development should therefore be restricted to Zone 1. QuadConsult Limited would recommend that the detailed model be obtained from the Environment Agency (if available) so that flood levels can be plotted accurately, although it should be acknowledged that they will never exceed that of the main highway, Selbourne Road, which effectively would act as a spillway.

The construction of an access into the site may displace a volume of flood water for the extreme events so this should be compensated for in the site itself.

Surface water from the proposed development will be attenuated within the Zone 1 area of the site and discharged at an agreed rate into the existing watercourse. A volume approximately to 1900m<sup>3</sup> will be required assuming a 70% coverage of the Zone 1 developable area for a suggested discharge rate of 5l/s.

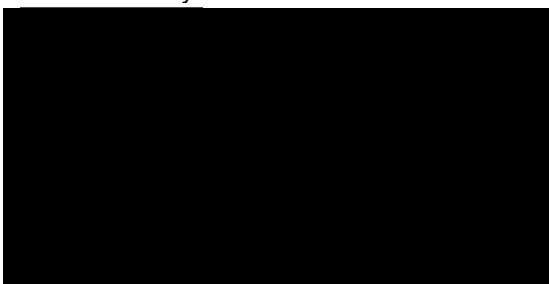
Infiltration testing should be undertaken on site to determine the potential for discharge to ground in the form of soakaways.

Surface water runoff will be conveyed overland for the proposed development wherever possible and be supported with the extensive use of SuDS features in accordance with the DCG.

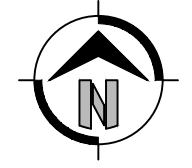
Early engagement with the Local Water Authority is recommended to determine a point of connection with sufficient capacity to receive predicted site flows. These can be calculated when a layout has been developed. A capacity check should also be undertaken at the receiving treatment plant.

Foul drainage records were not available at the time of writing although it is proposed to pump foul from the site, probably connecting into the system just north of the development serving a recently constructed residential area.

Yours faithfully



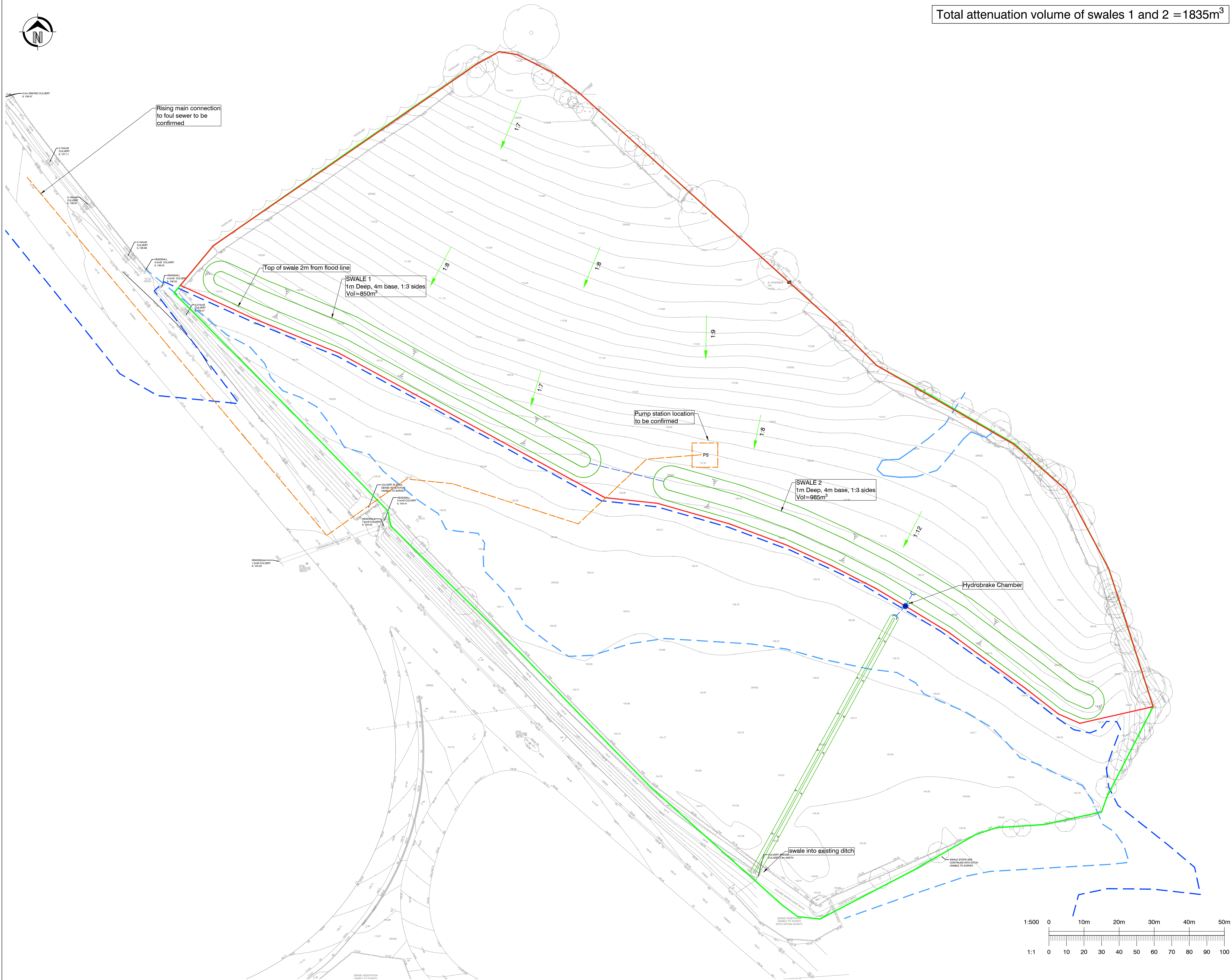




Total attenuation volume of swales 1 and 2 = 1835m<sup>3</sup>

- GENERAL NOTES**
1. This drawing is to be read in conjunction with and checked against all other drawings, engineering details, specifications and any structural, geotechnical or other specialist document provided.
  2. Any discrepancies within all relevant drawings are to be reported to QuadConsult Ltd immediately.
  3. All dimensions and levels are in metres, U.N.O..
  4. Do not scale from this drawing - use figured dimensions only.
  5. This drawing is schematic for clarity only, positions of pipe runs and manholes may vary on site due to site conditions.
  6. Surface water drainage subject to S104 / SAB approval where appropriate with the relevant authority.
  7. Foul Drainage subject to S104 approval with relevant water authority.
  8. All private drainage to be installed in accordance with Part H of building regulations and the developers warranty provider.
  9. The contractor is at risk if construction is progressed without relevant S104, S106, S278, S38, OWC etc agreement being in place with the relevant authorities.

- Legend**
- SW Pipe Network
  - Hydrobrake
  - Swale
  - PS FW Pumping Station
  - FW Rising Main
  - Flood line (Seas and Rivers)
  - Flood line (Surface Water)
  - Existing Topography Falls
  - Approximate Site Area (34,642m<sup>2</sup>)
  - Approximate Developable Area (19,461m<sup>2</sup>)



Rev	Date	Description	By

Dimensions to be verified on site.  
This drawing should not be scaled. Use figured dimensions only.  
Any discrepancies should be referred to the Engineer prior to work being put in hand.  
This drawing is copyright.

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**QuadConsult**  
ENGINEERS IN PARTNERSHIP  
Consulting Civil & Structural Engineers

Client: **OCTAVIA GROUP**

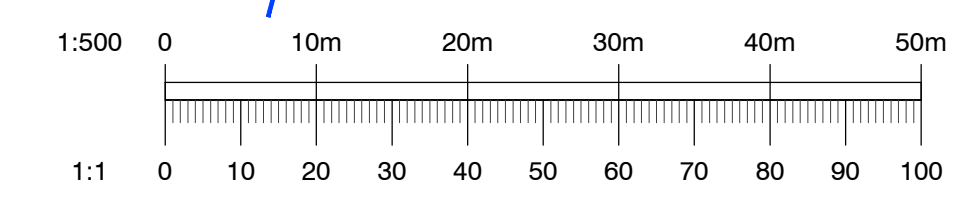
Project: **LAND NORTH OF A31, ALTON**

Title: **DRAINAGE STRATEGY PLAN**

Drawing Status: **PRELIMINARY**

Designed by	Drawn by	Checked by	Date	Scale @ A1 size
GS	GS	SPM	FEB 24	1:1000

Drawing No: **24060-C-001-0**



File name: 24060-C-001-Drainage Strategy Plan.dwg





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## **EAST HAMPSHIRE DISTRICT COUNCIL**

### **DRAFT LOCAL PLAN 2021-2040 (REGULATION 18)**

**Subject:** Residential Site LAA/LIP-011

**Client:** Templeview Developments Ltd Kitchen End Silsoe Bedfordshire  
MK45 4QT

**Site:** Land south of Haslemere Road Liphook

#### **Background Documents**

1. Land Availability Assessment (LAA) : November 2023
2. Housing Background Paper : January 2024
3. Housing Needs and Requirements – Reg 18(1) : November 2022
4. Settlement Hierarchy : January 2023
5. National Character Area Profile – 120 Wealden Greensand
6. National Planning Policy Framework : December 2023

#### **Representation**

1. Our Client objects to the omission of site LAA/LIP-011 comprising 1.53ha of land on the south side of Haslemere Road Liphook, which was identified in the LAA – November 2023 (Appendix A : Included Sites). The site is well contained by the existing road and railway together with the built environment fronting Devils Lane and well related to the settlement of Liphook and other proposed allocation sites. Despite the reduction in site capacity, the site is capable of early delivery and will make a worthy contribution to the range of small and medium sized sites recommended by the NPPF at paragraph 70.
2. We strongly support the identification of Liphook as a Tier 2 settlement at draft Policy S2 – Settlement Hierarchy. This is consistent with the current designation in the adopted JCS and supported by the Settlement Hierarchy Background Paper – January 2023.
3. The draft Local Plan 2021-2040 (Regulation 18) and the supporting background papers all appear to have been prepared without any realistic assessment of the practical effects of the Mandatory Biodiversity Net Gain requirements – Environment Act 2021 and Schedule 7A of the Town and Country Planning Act 1990. This is impacting widely on the viability of sites both in financial terms and regarding site capacity. This has particular impact in National Character Areas with an existing rich habitat value, such as NCA 120 – Wealden Greensand. This area has an outstanding



landscape, geological, historical and biodiversity interest. Biodiversity interests are represented by internationally and nationally designated sites alongside numerous local sites and other non-designated semi-natural habitats.

4. Furthermore, the proximity of the settlement of Liphook, and others in the district, to the strategic environmental constraints of Special Protection Areas, together with their buffer zones, Conservation Areas, Ancient Woodland, and the South Downs National Park places further pressures on the realistic capacity of new allocation sites. This is further exacerbated by the need to either provide SANG facilities within an allocated site or on other less constrained land nearby.
5. For all these reasons, we submit that the site capacities assumed for proposed residential allocation sites in Liphook and other upper tier settlements should be reviewed and reduced to reflect the realities of BNG Assessments, together with additional proposed allocations in order to ensure effective delivery of the draft housing requirements and to maintain an adequate supply of deliverable sites in accordance with NPPF paragraphs 60, 69, 70 and 75, together with paragraphs 123 (effective use of land) and 180 (conserving and enhancing the natural environment).
6. The current planning application reference 23150/005 proposes that the site be developed for nine dwellings. It is noted that in accordance with the PPG<sup>1</sup>, sites submitted that are judged by the Council to accommodate less than five dwellings were not suitable for further consideration through the LAA. However, it is considered that the land south of Haslemere Road Liphook has a realistic capacity in excess of five dwellings and the overall reduction in capacity due to the environmental constraints outlined above should not preclude the site allocation within the draft Local Plan.
7. Accordingly, we respectfully request that the draft Local Plan be amended to:
  1. Add site LAA/LIP-011 to the Liphook housing allocations at Chapter 12.
  2. Amend the draft Policy Map to show the additional allocation.

  
22 February 2024

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<sup>1</sup> Planning Practice Guidance paragraph 009 Reference ID: 3-009-20190722

**From:** [REDACTED]  
**Sent:** 07 March 2024 11:44  
**To:** [EHDC - Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Bellway Strategic Ltd - Response to the Regulation 18 Draft Local Plan  
**Attachments:** [dha\\_17293 - EHDC Reg 18 Response - Land East of Devil's Lane, Liphook.pdf](#)

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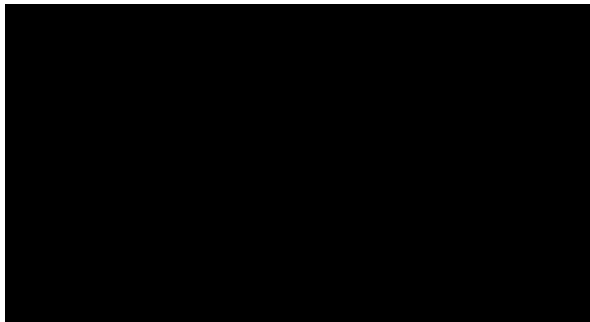
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## **EAST HAMPSHIRE DISTRICT COUNCIL**

### **Draft Local Plan (Regulation 18) Consultation Response** **Land east of Devil's Lane, Liphook**

CLIENT: Bellway Strategic Ltd

March 2024  
DHA/17293



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# CONTENTS

<b>1</b>	<b>INTRODUCTION</b> .....	<b>2</b>
<b>1.1</b>	<b>PURPOSE OF THIS REPRESENTATION</b> .....	<b>2</b>
<b>1.2</b>	<b>BACKGROUND</b> .....	<b>2</b>
<b>2</b>	<b>PROPOSED RESIDENTIAL ALLOCATION SITE</b> .....	<b>4</b>
<b>2.1</b>	<b>SITE DESCRIPTION</b> .....	<b>4</b>
	Spatial and Landscape Designations .....	5
	Ecology .....	6
	Flood Risk .....	6
	Heritage .....	6
<b>2.2</b>	<b>PLANNING HISTORY</b> .....	<b>6</b>
<b>2.3</b>	<b>LAND AVAILABILITY ASSESSMENT ('LAA') (2023)</b> .....	<b>8</b>
<b>2.4</b>	<b>DELIVERABILITY</b> .....	<b>8</b>
<b>3</b>	<b>RESPONSE TO THE DRAFT LOCAL PLAN</b> .....	<b>10</b>
<b>3.1</b>	<b>PLAN-MAKING POLICY FRAMEWORK</b> .....	<b>10</b>
<b>3.2</b>	<b>VISION AND AIMS</b> .....	<b>11</b>
	DRAFT POLICY S1 (SPATIAL STRATEGY) .....	12
	DRAFT POLICY S2 (SETTLEMENT HIERARCHY) .....	15
<b>3.4</b>	<b>CLIMATE EMERGENCY</b> .....	<b>18</b>
<b>3.5</b>	<b>NATURAL AND BUILT ENVIRONMENT</b> .....	<b>18</b>
<b>3.6</b>	<b>HERITAGE</b> .....	<b>20</b>
<b>3.7</b>	<b>RESIDENTIAL AMENITY</b> .....	<b>20</b>
<b>3.8</b>	<b>DARK NIGHT SKIES</b> .....	<b>20</b>
<b>4</b>	<b>CONCLUSION</b> .....	<b>21</b>
<b>4.1</b>	<b>REPRESENTATION SUMMARY</b> .....	<b>21</b>

**Appendix A** – Planning History

**Appendix B** – Map of local authorities where there is a requirement to demonstrate nutrient neutrality

# 1 INTRODUCTION

## 1.1 PURPOSE OF THIS REPRESENTATION

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- 1.1.1 This representation has been prepared on behalf of Bellway Strategic Ltd ('our client') in response to East Hampshire District Council's Draft Local Plan (Regulation 18) Consultation which runs until 4<sup>th</sup> March 2024.
- 1.1.2 Bellway Strategic Ltd have an interest in an area of land known as 'Land East of Devil's Lane, Liphook' (hereafter referred to as 'the Submission Site') and have been promoting the Site for allocation as part of the emerging local plan for some years.
- 1.1.3 East Hampshire District Council ('EHDC' or 'the Council') is preparing a new Local Plan with the aim of providing an updated spatial framework and development management policies for the plan area to 2040. The new Plan will replace the adopted Local Plan comprising the Part 1 – Joint Core Strategy and Part 2 – Housing and Employment Allocations documents, along with the saved policies of the East Hampshire District Local Plan: Second Review.
- 1.1.4 For the reasons discussed herein, our client continues to promote and support the inclusion of the land east of Devil's Lane in the local plan as a sustainable and deliverable housing site to meet local housing needs in combination with the promoted sites to the west. This representation considers the merits of the Site in the context of the Council's proposed development strategy, affirms our client's commitment to the Site, and justifies why the site is suitable for allocation within the emerging Local Plan.
- 1.1.5 For the avoidance of doubt, the site was previously referred to in EHDC's Land Availability Assessment as two separate parcels - Land west of Haslemere Road (LIP-022) and Land east of Devils Lane (LIP-023) – and was referred to as such in previous representations submitted by our client. In the latest Land Availability Assessment, the site in its entirety is now Land east of Devil's Lane (LIP-023).

## 1.2 BACKGROUND

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- 1.2.1 Initial evidence prepared for the emerging East Hampshire Local Plan commenced in 2017. The Council then undertook two Regulation 18 consultations during 2019, initially on the key issues and priorities for the district, and subsequently a consultation on large development sites in September 2019.
- 1.2.2 However in early 2022, the Council decided to re-evaluate its spatial options for growth and as a result further consultation on key issues and priorities was carried out under Regulation 18 in late 2022 and early 2023. As the next stage in the plan making process, the Council is now consulting on the preferred strategy for

meeting the development needs of the district and the Council intends to take the plan forward to Regulation 19 (pre-submission) consultation in Summer 2024, with a submission for Examination currently anticipated in December 2024.

- 1.2.3 Bramshott and Liphook Parish Council have also commenced preparation of a Neighbourhood Plan. Our client has been in close consultation with the Neighbourhood Plan Steering Group and our client's site has been positively received as a potentially suitable site for future housing development in the parish. At present, it is our understanding that the Neighbourhood Plan will set out strategic and development management policies, however, the plan will not include specific site allocations.

## 2 PROPOSED RESIDENTIAL ALLOCATION SITE

### 2.1 SITE DESCRIPTION

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- 2.1.1 The Submission Site relates to a circa 6.22 hectare area of land that lies to the south east of Liphook in East Hampshire (site reference LAA/LIP-023 (Land East of Devil's Lane, Liphook)).
- 2.1.2 The site comprises a mix of agricultural and residential land that is bounded by Devil's Lane to the west, Highfield Lane and a by-way (Reference O32/42/1) to the south, Haslemere Road to the east, and third-party land to the north, with the railway line running between Liphook and Haslemere beyond. There are no public rights of way within the Site.
- 2.1.3 The Site can currently be accessed via an existing gate and entrance from Highfield Lane, or via the entrance to the existing residential property within the Site – Lakehouse – on Haslemere Road, or via a gate on the junction of Devil's Lane and Chiltley Lane.
- 2.1.4 Immediately west of Devil's Lane are three parcels of land being promoted by Vistry Homes and Bloor Homes, referred to as 'Land at Old Shepherds Farm' (LAA/LIP-019); 'Land at Devils Lane, Liphook' (LAA/LIP-020); and 'Chiltley Farm, Liphook' (LAA/LIP-017). The land to the south of the site, 'Land North of Highfield Lane', is also being promoted (LAA/LIP-021). These sites, in combination with the Submission Site and the land to the north, form part of one large site allocation referred to as 'Land South East of Liphook' (LAA/LIP-041), extending to an area of 43.21 hectares in its entirety.
- 2.1.5 A live outline planning application for up to 100 dwellings is currently being considered by the Council under reference 22789/007 for Chiltley Farm, submitted by Bloor Homes.
- 2.1.6 The Site lies within walking distance of Liphook which is described in the adopted Local Plan as a 'Large Local Service Centre', containing a range of services and a location deemed to be suitable to accommodate new development. Local shops and services include the Liphook & Liss Surgery, a large Sainsbury's and petrol station, the Liphook Millenium (village) Hall, pubs and eateries, shops and employment opportunities.
- 2.1.7 Liphook Station is a 15 minute walk away from the Site which provides non-car access to nearby towns or to London, Portsmouth and Southampton further afield. The strategic road network (A23) is conveniently located to the north of the village and is one of the primary routes through the county, connecting London to the south coast.





FIGURE 2.1: AERIAL PHOTOGRAPH OF THE SITE (BASE AERIAL: GOOGLE EARTH)

## Spatial and Landscape Designations

- 2.1.8 The Site is not covered by any national spatial or landscape designations, other than a small corner on the eastern boundary that falls within the boundary of the South Downs National Park, as shown in Figure 2.1 above.
- 2.1.9 The Landscape Capacity Study (2018) shows the site within the Passfield to Liphook Farmland and Heath Mosaic Local Area, of which an integral feature is a complex landform of two north-south valleys cutting through higher land to the east and south. In particular, it notes that Liphook has a generally well-vegetated edge and little effect on the wider rural character. The report considers it possible that a very small amount of additional development could be accommodated, inter alia, adjacent to the settlement edge provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and local distinctiveness.
- 2.1.10 As noted previously, the Site is currently rural by virtue of the lack of built form. However, there are clear visual connections with the existing built development on Highfield Lane.

## Ecology

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- 2.1.11 The Site is not covered by any statutory environmental designations, with the nearest being the Lynchmere Commons Local Nature Reserve approximately 149m to the east and a cluster of designated sites to the west of Wheatsheaf Common comprising the Chapel Common Site of Special Scientific Interest (SSSI), the Forest Mere SSSI, the Wealden Heaths Phase II Special Protection Area (SPA), Woolmer Forest SSSI and Special Area of Conservation (SAC), all over 2.6km away from the site. The Bramshott and Ludshott Commons SSSI and a further section of the Wealden Heaths Phase II SPA lie approximately 1.1km north beyond the boundaries of the village.
- 2.1.12 The site falls within the 5km buffer of the Wealden Heaths Phase I & II SPAs. As such it will be necessary to mitigate the potential increase in recreational pressures in the SPA.
- 2.1.13 There are no priority habitats within the site and no ancient woodland.

## Flood Risk

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- 2.1.14 The Site lies entirely within Flood Zone 1 and is therefore at low risk of flooding from nearby rivers and the sea.
- 2.1.15 The ESDC Strategic Flood Risk Assessment identifies that the Site falls within an area that is 'highly compatible' for infiltration SUDS and there is limited potential for ground water flooding to occur.

## Heritage

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- 2.1.16 The Historic England listed building map search shows that there are no listed heritage assets within or in the near vicinity of the site.
- 2.1.17 The nearest listed building is the Grade II listed Goldenfield West Lychgate located approximately 280 to the west.

## 2.2 PLANNING HISTORY

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- 2.2.1 Online records held by EHDC show two applications of relevance to the site. These are listed at **Appendix A**.
- 2.2.2 For context, the aforementioned application for the land at Chiltley Farm is subject to a live outline planning application for up to 100 residential dwellings (Use Class C3), informal and formal open space, together with associated drainage, utilities, and all other associated works following the demolition of the existing buildings (reference 22789/007). The application remains subject to consideration and has been submitted speculatively by Bloor Homes.

2.2.3 A previous application had been submitted speculatively for the Bloor Homes site (reference 22789/006) which was refused and dismissed at appeal in 2016. The principal reason for the dismissal was the application's conflict with local planning policies as it was concluded that EHDC was able to demonstrate a five year supply of housing at that time. Nevertheless, the appeal decision provides some useful observations on the general suitability of the Bloor Homes site for housing which are considered to be comparable to the Submission Site. These observations are summarised below:

- The Council did not object to the appeal on the basis of landscape or visual impact although it referred to the harmful impact on the loss of a greenfield resource. Similar to the Submission Site, it is noted that land is well enclosed by boundary vegetation which screens it from the more rural landscape beyond.
- The inspector acknowledged that the appeal site was relatively well contained with mature boundary hedgerows and trees, with only limited glimpses into the appeal site, again similar to the Submission Site.
- The inspector acknowledged the proximity to the boundary of the South Downs National Park. However, they were satisfied that due to the intervening distances, landform and vegetative cover, there would be no adverse impacts on the natural beauty of that designated landscape or its setting.
- Although there were local objections to the loss of a greenfield site, the inspector did not consider it to fall within the scope of a valued landscape within the terms of Paragraph 109 of the NPPF. There were views into and across the appeal site, but generally public viewpoints are restricted similar to the Submission Site.
- The inspector acknowledged that not all residents in Liphook can access all village facilities on foot, however some facilities (the station, doctor's surgery and some local shops) would be accessible on foot from the appeal site. As part of the development it was proposed to improve the frequency of the bus services to improve access further, both for new residents and for existing residents nearby. It was acknowledged that many trips would also be taken by car, but this would be little different to many residential areas in Liphook including allocated sites. The inspector concluded that in the circumstances the site was deemed to be in an accessible location.
- It was noted that the centre of Liphook becomes congested, especially at peak times. However, the appeal proposal would make a site specific contribution to improvements at The Square which would increase the capacity of the mini-roundabouts. This would mean that existing congestion would not materially deteriorate as a result of the appeal scheme. In any event, the NPPF makes clear that development should only be prevented on transport grounds where the residual cumulative impacts would be severe. There is no evidence that this would be the case for the appeal site.

- 2.2.4 The Submission Site exhibits similar characteristics when read in combination with the wider allocation south-east of Liphook and the inspector's comments are considered to be relevant.

## **2.3 LAND AVAILABILITY ASSESSMENT ('LAA') (2023)**

---

- 2.3.1 The Land Availability Assessment 'LAA' was published in November 2023 and forms part of the evidence base to support the preparation of the emerging Local Plan. The Assessment identifies the potential supply of housing and economic land for development within the Plan area for the emerging Plan period and will serve to inform the spatial growth options taken forward as the Plan progresses.
- 2.3.2 The Submission Site is covered by LLA reference LAA/LIP-023 (Land East of Devil's Lane, Liphook) and was deemed to have capacity for 40 new homes in the 0-10 year plan period (following the development of the sites to the west).
- 2.3.3 As part of the wider 'Land South East of Liphook' parcel (Reference LAA/LIP-041) the site as a whole is deemed to have capacity for 485 dwellings within 0-10 years.

## **2.4 DELIVERABILITY**

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- 2.4.1 There are no known financial restrictions that would impact upon the viability of a future residential scheme or that would prohibit development coming forward within the Plan period.
- 2.4.2 Our client has control of the entire Submission Site, therefore it is available and achievable for the purposes of the tests of deliverability.

## **2.5 DEVELOPMENT POTENTIAL**

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- 2.5.1 The Submission Site has been promoted over a number of years by Bellway individually and previously, as part of the Large Development Sites consultation, it was submitted as part of a wider strategic site promoted by a consortium of landowners and developers. This wider site included the aforementioned land parcels forming 'Land South East of Liphook' under reference (LAA/LIP-041).
- 2.5.2 This collaborative approach enabled a cohesive, landscape-led masterplan to be produced which demonstrated how an extension to Liphook could be built comprehensively.
- 2.5.3 As part of the masterplanning process, careful consideration has been given to the opportunities and constraints identified within the vicinity of the Submission Site.
- 2.5.4 Of these includes the National Park boundary to the south, which had resulted in extensive landscaping and pockets of green space proposed to provide an



appropriate transition from the built up area, ensure that the visual screening from the National Park is retained and enhanced, and to offer tangible opportunities for biodiversity.

- 2.5.5 A number of access routes would be provided through the site to enable travel by car and to encourage travel on foot and bicycle through the adjacent neighbourhoods, providing access to local bus services and the wider pavement network.

## 3 RESPONSE TO THE DRAFT LOCAL PLAN

### 3.1 PLAN-MAKING POLICY FRAMEWORK

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3.1.1 Whilst the plan preparation is at an early stage, ultimately any decision making will have to have regard to whether the final plan is 'sound'. The National Planning Policy Framework (NPPF), most recently updated in December 2023, states that a local plan is 'sound' if it is:

**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;

**Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

**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

**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.

3.1.2 With the above in mind, it is important that evidence gathering is robust and sites and strategies are scrutinised to determine the best available options for accommodating development needs.

3.1.3 In addition, to the above, the NPPF states that: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
  - i. the application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
  - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

- 3.1.4 It is important to note that the NPPF requires for strategic policies to set out an overall strategy for the pattern, scale, and quality of development, and make sufficient provision for:
- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
  - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
  - c) community facilities (such as health, education and cultural infrastructure); and*
  - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*
- 3.1.5 It is clear from the above, that any local plan should set out a comprehensive and cohesive approach to future development both for the needs of East Hampshire and needs that cannot be met from neighbouring areas.

## **3.2 VISION AND AIMS**

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- 3.2.1 The East Hampshire Local Plan Vision seeks to deliver healthy, accessible and inclusive communities where quality affordable homes, local facilities and employment opportunities in sustainable locations will provide communities with green and welcoming places to live, work and play and respond positively to climate change.
- 3.2.2 We agree with the principles of this aim and we emphasise the role of suitably located strategic-scale development which in our experience is most effective in delivering the affordable housing and associated community, transport, health and education infrastructure which is necessary in order to create sustainable communities.
- 3.2.3 This is particularly relevant in East Hampshire, which as acknowledged in the draft Local Plan is largely rural in character, a significant portion of which falling within the South Downs National Park. It is therefore clear that the relative sustainability of new housing will be vastly different from a more urban district.
- 3.2.4 As such we would suggest that the Local Plan places stronger emphasis throughout on the need for new development to improve the sustainability of existing settlements through much needed Community Infrastructure Levy contributions and other appropriate developer contributions to improve, amongst other things, the quality and regularity of bus services and the provision or improvement of community facilities and accessible open space.

- 3.2.5 It is also critical to successful planning for sustainable development that more emphasis is given on the continued support for existing upper tier settlements, for example *“the vitality and viability of our existing upper tier settlements will be supported by allowing them to grow and thrive”*. We consider this to be important given the rural nature of the district. Accordingly, it is vital that a significant and proportionate level of growth in the form of additional dwellings to encouraged to support the continued growth and improved sustainability for these important settlements. These representations will set out why we consider that this opportunity is not currently being taken in Liphook.

### 3.3 HOUSING STRATEGY

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#### DRAFT POLICY S1 (SPATIAL STRATEGY)

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- 3.3.1 We support the clear statements made in Section 3 on the need to significantly boost the supply of homes with this being a key Government objective.
- 3.3.2 The NPPF requires that to determine the minimum number of homes, Local Plans should be informed by a local housing needs assessment, conducted using the Standard Method in national planning guidance. EHDC has identified a need for a minimum of 10,982 new homes through the plan period, equivalent to an annualised housing need of 578 dwellings for the Plan Area. However, it goes on to note that the National Planning Practice Guidance acknowledges that authorities “that do not align with local authority boundaries, such as National Parks, can identify a housing need figure using a method determined locally.”
- 3.3.3 With this in mind, EHDC confirms that when looking at a disaggregated approach to the standard method between East Hampshire and the South Downs National Park, the Local Plan area will require 464 homes per annum, or 8,816 homes in total over the plan period. It is noted that the South Downs National Park Authority will need to work through its own process to calculate local housing needs within its boundary. Nevertheless, it is expected that there will be some unmet need in light of the landscape sensitivities of the National Park and this unmet need has been estimated by EHDC as being approximately 14 homes per annum or 266 homes over the plan period. This figure has been accounted for in the draft Local Plan, taking the minimum housing target to 478 homes per annum or 9,082 homes across the plan period.
- 3.3.4 However, we have significant concerns that no assumptions have been made on the unmet needs of other neighbouring authorities (with the exception of the South Downs National Park), despite the very high level of unmet need identified across the South Hampshire subregion set out in the Partnership for South Hampshire Spatial Position Statement (December 2023), as set out in Table 3.1 below.



<b>Local Authority</b>	<b>Annual Housing Need using Standard Method (dpa)</b>	<b>Total Housing Need 2023-2036</b>	<b>Identified Supply (Commitments, Allocations and Windfall Estimate)</b>	<b>Shortfall/Surplus</b>
East Hampshire (part)	113	1,469	1,275	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	+900
Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	899	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0 <sup>1</sup>
Test Valley (part)	182	2,366	3,109	+743
Winchester (part)	235	3,055	3,055	0
<b>TOTAL</b>	<b>6,037</b>	<b>78,481</b>	<b>64,909</b>	<b>-11,771</b>

3.3.5 These figures set an alarming position of under delivery in the South Hampshire area. In particular, it is notable that the authority immediately to the south of the district – Havant – has a significant level of unmet need and this need is unlikely to be met in the short term due to significant delays on the progression of the Havant Local Plan, following the withdrawal from examination in 2022 over concerns on deliverability. The Local Development Scheme published in November 2023 indicates that the submission of the new Havant Local Plan for examination is unlikely to take place until the end of 2025.

3.3.6 The NPPF states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a

<sup>1</sup> Set as 0 on the basis that the shortfall is a result of the Urban Uplift required by the NPPF and it would not be appropriate to apportion this shortfall to other authorities.

positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

- 3.3.7 It continues to note that in order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address such matters. These should be made publicly available throughout the plan-making process to provide transparency.
- 3.3.8 The National Planning Practice Guidance notes that if another authority will not cooperate, or agreements cannot be reached, this should not prevent the authority from submitting a plan for examination. However, the authority will need to submit comprehensive and robust evidence of the efforts it has made to cooperate and any outcomes achieved; this will be thoroughly tested at the plan examination.
- 3.3.9 Through the Duty to Cooperate process, as noted in the Statement of Common Ground with Chichester, it has been agreed that EHDC has the strongest functional relationship with the adjacent areas of Waverley Borough and Havant largely due to the extent of shared boundary along the north eastern and southern edges of the district, and the key transportation routes that pass between them. However, it is noted that there is no Statement of Common Ground with Havant as part of the evidence base for the Local Plan consultation and given the close relationship between the two authority areas, this document is vital in understanding local and wider housing needs.
- 3.3.10 The Duty to Cooperate Framework, published in July 2022, indicates that there has been continuous and ongoing engagement between the two authorities in respect of cross boundary and strategic matters, stating in section 10 that Havant Borough Council had identified that it may require assistance in meeting its housing requirements. No further information has been provided on more recent discussions and we would encourage EHDC to publish the latest information on these discussions as part of the Regulation 19 consultation. This is vital in understanding whether EHDC's proposed housing target is appropriate.
- 3.3.11 Furthermore, strategic, cross-boundary working with Havant is even more important as the other nearby districts to Havant are already experiencing significant shortfalls in housing supply, as noted previously in Table 3.1. They are also significantly or entirely affected by the requirement for new residential development to demonstrate nutrient neutrality and offset recreational impact on the Solent protected sites, further slowly down housing delivery in the South Hampshire area. This includes but is not limited to Havant, the southern end of East Hampshire, and the entirety of Portsmouth, Gosport, Fareham, Eastleigh and Southampton. A copy of the map showing the affected authorities is contacted **Appendix B.**

- 3.3.12 In light of the nutrient neutrality and recreational impact mitigation requirements referred to above, the southern part of the district, south of the National Park, is considerably more constrained than the land to the north of the National Park. Indeed, the main road (A3) and railway line running through Hampshire provides direct access to Havant and other coastal towns in the north eastern part of the district, meaning that it would entirely reasonable for those working in South Hampshire to look further inland for new housing. A direct train line is available to Havant from Liphook, for example, in less than 30 minutes.
- 3.3.13 Overall, we have significant concerns that the level of unmet needs of Havant have not been acknowledged in the Local Plan and would encourage this to be reconsidered in the Regulation 19 draft. We do not believe that the 642 surplus of homes proposed in the draft Local Plan, in context of our observations on the proposed site allocations below, can be delivered. As such, we say that it is critical that EHDC allocates additional sites in the district to cater for some of this unmet need, for the reasons discussed below.

#### **DRAFT POLICY S2 (SETTLEMENT HIERARCHY)**

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- 3.3.14 We are supportive of **draft Policy S2** and the proposed definition of Liphook as a higher tier settlement, given the range of shops, services and transport connections available for residents. These shops and services will be supported by additional spending from new residents on allocated sites, strengthening the health of local businesses and encouraging new businesses to establish through the plan period.
- 3.3.15 As noted previously, local transport routes and infrastructure will also be improved through Community Infrastructure Levy payments and appropriate developer contributions that can only be secured through new development. The sustainability and self-sufficiency of these settlements will only improve as a result.
- 3.3.16 We are unclear however why Liphook has been identified as a Tier 2 settlement compared to the singular Tier 1 settlement of Alton. The Local Plan does not distinguish between the two, noting that the "largest levels of growth are expected to be in higher order settlements (Tier 1 & 2) due to their greater access to public transport, services and amenities.
- 3.3.17 While it is acknowledged that Alton is larger in size than Liphook, Liphook is comparable in terms of the services and facilities, featuring a wide range of options capable of supporting day to day activities for residents, and excellent road and rail connections further afield. The Revised Settlement Hierarchy Background Paper notes in paragraph 3.9 that support was given in responses to the previous consultation for Liphook's position within Tier 1 due to the services in the centre of the settlement, its schools and railway station which were thought to be within an accessible distance of the main built-up area. It was also comparable to Alton in terms of accessibility in the Regulation 18 Issues and Priorities Consultation.

- 3.3.18 Notwithstanding the above, it is clear that the number of houses allocated to Liphook (111) falls well short of other Tier 2 settlements, namely Whitehill & Bordon (667 units) and Horndean (320 units). It is also noted that 3 of 5 of the Tier 3 settlements are allocated more than Liphook (Four Marks – 210, Clondean – 180 and Rowlands Castle – 145).
- 3.3.19 Furthermore, of the proposed allocations as a whole, there are a number that are significantly more constrained and vastly less desirable in planning terms than the Submission Site and we are unclear why they have been selected over the Submission Site which does not exhibit these constraints. These include:
- ALT4 (Land at Whitedown Lane, Alton) - this site is physically and visually separated from Alton by the A339 and boundary trees and does not adjoin existing built form. In our view this would be an incongruous extension to the settlement.
  - ALT6 (Land at Wilsom Road, Alton) - this site is largely covered by Flood Zone 2 and 3 which is a significant constraint to development.
  - ALT8 (Land at Neatham Manor Farm, Alton) - similar to ALT4 this site is physically and visually separated from the settlement by the A31 and would be an incongruous feature in the open rural landscape in this area. While a landscape-led scheme has been proposed, this site is significantly less accessible than the Submission Site and it has no relationship with existing built form.
  - W&B3 (BOSC Residential Expansion), W&B4 (Louisburg Residential Extension) and W&B5 (North of Louisburg Employment Proposal) - all of these sites are covered entirely by existing woodland. The development of these sites would result in a significant ecological impact and it is highly unlikely that the mandatory 10% biodiversity net gain could be achieved.
- 3.3.20 By comparison, the allocation of the Submission Site in combination with the other sites south-east of Liphook as a natural and in-keeping extension to an upper tier settlement would be wholly consistent with draft Policy S2 which sets out a presumption in favour of sustainable development within the Settlement Policy Boundary proposed to be extended to accommodate new housing allocations.
- 3.3.21 In accordance with section S2.3 of this policy, any future development could be designed to respect the setting, form and character of Liphook. It would sit comfortably within the existing suburban context and would not be seen as a discordant extension into the countryside in light of the well established boundary features which are proposed to be enhanced.
- 3.3.22 Similar to the inspector's conclusions on the Bloor Homes site, the Submission Site in combination with the adjacent sites would be sustainably located in proximity to existing transport and walking routes to local shops, services and facilities from the outset. These services would be further supported by Community Infrastructure Levy payments and other appropriate developer contributions which would benefit the new residents and the wider community. Indeed, the level of contributions that could be made would increase with a larger development area, which could be used to provide transport links within the site itself.



- 3.3.23 Comparatively, it is highly unlikely that the proposed allocations listed above would meet the requirements of section S2.3.

### **Accessibility**

- 3.3.24 It is also noted that the Council's approach to the 20 minute neighbourhood is proposed to change to reflect a 20-minute round trip i.e. the ability to reach a destination in 10 minutes. Whilst we support the intention to focus new development in the most accessible locations in the district, we urge the Council to not over rely on methodology for assessing accessibility based on existing shops and services as it has the potential to disregard sustainable sites that would in all other aspects be considered appropriate for new development. Indeed this was acknowledged by EHDC within the previous consultation. It also does not factor in new shops, services and facilities that can be delivered in tandem, which would improve the accessibility of these sites as a result (in addition to adjacent existing residential development).
- 3.3.25 The draft Local Plan is supported by a Living Locally Accessibility Study and Decide & Provide Methodology prepared by Ridge & Partners. However, the evidence within this study, particularly the WSP study referred to on page 16, actually points to a 30 minute neighbourhood as being the most appropriate for East Hampshire.
- 3.3.26 In summary, Bellway supports the Council's aspirations to promote accessible developments and settlements, and the Submission Site is able to achieve this. However the methodology adopted is not realistic or appropriate to the existing character of the East Hampshire district and should be revised accordingly so as to not exclude sustainable sites such as those to the south-east of Liphook.

### **Sustainability**

- 3.3.27 Development on this site would contribute to the achievement of sustainable development as required by draft Policy S2.
- 3.3.28 An economic role includes contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. In this respect, the site is suitable, sustainable, available and deliverable for development, and would help contribute to EHDC's housing need for the Plan period with the provision of a strategic-scale contribution of high-quality new homes of a mix of dwelling sizes, types and tenures. Household expenditure generated by future residents would support economic activity locally and development would also enable the Council and local community to benefit from revenue linked to requested Section 106 contributions.
- 3.3.29 From a social perspective, residential development would cater for the provision of housing in a sustainable location immediately adjacent to housing and supporting infrastructure. The development of well-contained, relatively unconstrained greenfield sites, already strongly characterised by their location within the proximity of existing upper tier settlements, would help avoid the need

for more significant large-scale greenfield site releases in more sensitive landscapes that would have a greater level of impact and harm.

- 3.3.30 Likewise, the site has the potential to provide for a range of dwellings that would meet the District need, could provide for a mix of both market and much-needed affordable housing as well as smaller and larger family units which will help maintain a balanced community within the north of the Plan Area.
- 3.3.31 From an environmental perspective, it is acknowledged that the allocation would result in development of a greenfield site. However, it is clear that the housing need in East Hampshire cannot be met by limited urban sites and greenfield development is inevitably required in such a rural area. The development of a relatively unconstrained greenfield site sustainably located close to services, facilities and public transport connections and at an appropriate and effective density is considered a preferable location in the context of sustainability objectives and simultaneously will make a modest contribution to reducing the need to develop into wider, more ecologically valuable and visually sensitive sites in the countryside.
- 3.3.32 From a wider sustainability perspective, the proposal would not involve the loss of land that is of high ecological value and would not comprise development in an area of high flood risk.

### 3.4 CLIMATE EMERGENCY

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- 3.4.1 We support and encourage the inclusion of policies dedicated to the climate emergency which aligns with our client's business objectives and overarching commitment to developing sustainable homes.
- 3.4.2 In respect of **draft Policy DGC2** (Sustainable Transport), at this early stage no absolute constraints with regards to access are anticipated and early access feasibility work demonstrates that suitable and safe access to serve the expected capacity can be achieved.
- 3.4.3 The indicative layout of the site previously produced for the land south east of Liphook has sought to provide genuine opportunities for non-car transport modes by maximising permeability and ensuring that these routes are safe and pleasant to use through passive surveillance and soft landscaping.

### 3.5 NATURAL AND BUILT ENVIRONMENT

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- 3.5.1 We are supportive of **draft Policy NBE1** and **Policy NBE3** which reflects the Government's mandatory 10% biodiversity net gain. From early experience, the delivery of biodiversity net gain on development sites can be challenging, therefore a higher target than 10% is actively discouraged to avoid delays to the delivery of new housing.

- 3.5.2 These policies are supplemented by draft development management policies **DM1** and **DM2**.
- 3.5.3 From an ecological perspective, the site is not subject to any specific designations and it is anticipated that development of the site can be delivered without incurring any adverse ecological harm. Any development on the site will incorporate substantial landscaping and open space opportunities for the ecological enhancement of the site and delivery of at least 10% biodiversity net gain. This will ensure that any development becomes embedded into the landscape and continues to benefit from and retain the naturally vegetated boundaries which are characteristic of the local area.
- 3.5.4 We also accept the inclusion of **draft Policy NBE4** which states that development within the 400m to 5km buffer of the Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC boundaries must be supported by a Habitat Regulations Assessment setting out the likely significant effect on the integrity of these protected sites.
- 3.5.5 As noted in the draft policy, the type of mitigation will be dependent on the type and size of the proposed development. It is proposed that Suitable Alternative Natural Greenspace (SANG) is provided within or on land near to the Submission Site (within our client's control) to provide the necessary mitigation. Our client is confident that this can be delivered to mitigate the recreational pressures that may be generated by the proposed development.
- 3.5.6 **Draft Policy NEB10** (Landscape) states that development proposals must conserve and wherever possible enhance the special characteristics, value, features and visual amenity of the Local Plan Area's landscapes.
- 3.5.7 As previously noted, Landscape Capacity Study (2018) observes that Liphook has a generally well-vegetated edge and little effect on the wider rural character. The report considers it possible that a very small amount of additional development could be accommodated, inter alia, adjacent to the settlement edge provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and local distinctiveness.
- 3.5.8 In line with these observations, the development of the Submission Site in tandem with the adjacent sites could easily be achieved whilst also retaining enhancing the well vegetated edge to the site which remains characteristic of the local area. This will have the added benefit of retaining the natural screening from the National Park beyond, thereby protecting its immediate setting.
- 3.5.9 With respect to landscaping, the early design masterplan carefully considers the natural features of the site to minimise the visual impact of the proposals which incorporate a landscape-led design approach to green infrastructure, creating meaningful open, green spaces, recreation and children's play space, and high-quality biodiversity and landscape boundary improvements.

- 3.5.10 The small area of the site located within the boundaries of the National Park will be carefully designed into the scheme as vegetated green space.
- 3.5.11 The above design principles delivered alongside a robust scheme of allocation criteria will ensure that the development can be delivered on the site without significant adverse landscape impact.
- 3.5.12 Any future development of the Submission Site would be prepared in consultation with both the local community and EHDC.

### 3.6 HERITAGE

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- 3.6.1 **Draft Policy NBE14** (Heritage Assets and the Historic Environment) seeks to protect, conserve, and where possible enhance the significance of designated and non-designated heritage assets in accordance with the requirements of the NPPF.
- 3.6.2 As noted previously, there are no listed assets or Conservation Areas in proximity to the site that would be affected by the proposed allocation.

### 3.7 RESIDENTIAL AMENITY

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- 3.7.1 **Draft Policy DM11** (Amenity) seeks to prevent development that would have a significant adverse impact on the amenity of nearby buildings or spaces and existing or future occupiers.
- 3.7.2 By virtue of the site layout, separation distances and landscaping that would be incorporated between proposed and existing properties, it is unlikely that the scheme would result in any adverse impacts on the amenity of nearby properties.

### 3.8 DARK NIGHT SKIES

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- 3.8.1 In accordance with **draft Policy DM12**, the development of the Submission Site would be supported by a sensitive lighting scheme in recognition of its position adjacent to the National Park.
- 3.8.2 It is noted that South Downs National Park Dark Night Skies Zone map shows the site just outside the Transition Zone which falls beyond the 2km buffer zone around the Dark Sky Core. As such, the sensitivity of the site in relation to land within the National Park will be lower, particular given its position next to an existing settlement. Further it should be noted that the Highfield & Brookham School campus lies between the site and the rural landscape of the National Park, meaning that artificial light will already be present in this area.



## 4 CONCLUSION

### 4.1 REPRESENTATION SUMMARY

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- 4.1.1 This representation has been prepared on behalf of Bellway Strategic Ltd in response to East Hampshire District Council's Draft Local Plan (Regulation 18) Consultation which runs until 4<sup>th</sup> March 2024.
- 4.1.2 Bellway Strategic Ltd have an interest in an area of land known as 'Land East of Devil's Lane, Liphook' and have been promoting the Site for allocation as part of the emerging local plan for some years.
- 4.1.3 In light of the constrained nature of much of the District and the limited development capacity of the existing towns, it will be necessary to support the sensitive expansion of settlements through landscape-led development to deliver the housing and economic development needs of the Plan area. The draft Local Plan seeks to identify appropriate locations for these settlement expansions; however we raise significant concerns regarding the deliverability and appropriateness of these sites in planning terms.
- 4.1.4 Concerns have also been raised within this representation regarding the provision made for the significant shortfall in housing land in the adjacent authority of Havant and the lack of information concerning more recent discussions on cross-boundary collaboration. These concerns are heightened in light of the observations made on the proposed housing allocations.
- 4.1.5 We do not believe that the development capacity of Liphook has been maximised and we are unclear why the land south-east of the settlement has been excluded as it is much less constrained than some of the proposed allocations and its development would represent a logical and sustainable development extension to the existing settlement area. Such locations are where the associated benefits of new development, including associated affordable housing, infrastructure and community facilities may be best delivered and are most effectively achieved through the Plan-making system.
- 4.1.6 This representation considers the merits of the site allocation in the context of the District's future development needs and affirms our client's commitment to both delivery of the site, and continued engagement with the Local Planning Authority and the developers promoting the adjacent sites. Given the clear consistency of the land south east of Liphook with the preferred growth strategy, and the concerns raised above, we respectfully request that the land is reconsidered for allocation in the emerging Local Plan.
- 4.1.7 In addition to being sustainable, the site is under single control, with no known viability or legal issues, and there are no impediments to the site being delivered for housing in the early plan period.

APPENDIX

A



## Planning History

Reference	Description	Decision
59317	Application to determine if prior approval is required on behalf of an electronic communications code operator for the installation of a 22.5 metre lattice tower supporting 3 no. antennas on support poles, 2 no. 0.6 metre dishes, 3 no. associated cabinets.	Withdrawn 17/01/2022
49634	Two storey extension to south elevation and replacement single storey extension after demolition of lean-to and conservatory (as amended by plans received 18 August 2006 and 01 September 2006).	Approved 04/09/2006

APPENDIX

B







European protected sites requiring nutrient neutrality strategic solutions

Scale: 1:340,000

**Component SSSIs of Solent: Includes Chichester and Langstone Harbours SPA/Ramsar, Solent and Southampton Water SPA/Ramsar, Solent Maritime SAC, Portsmouth Harbour SPA/Ramsar**

- Local Authorities
- SSSI subject to nutrient neutrality strategy
- Nutrient neutrality SSSI catchment
- National Parks





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infrastructure  
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## **EAST HAMPSHIRE DISTRICT COUNCIL**

### **Draft Local Plan (Regulation 18) Consultation Response** **Land at Old Shepherd's Farm and Devil's Lane, Liphook**

CLIENT: Vistry Group

March 2024  
DHA/33069



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# CONTENTS

<b>1</b>	<b>INTRODUCTION</b> .....	<b>2</b>
<b>1.1</b>	<b>PURPOSE OF THIS REPRESENTATION</b> .....	<b>2</b>
<b>1.2</b>	<b>BACKGROUND</b> .....	<b>2</b>
<b>1.3</b>	<b>ABOUT VISTRY GROUP</b> .....	<b>3</b>
<b>2</b>	<b>PROPOSED RESIDENTIAL ALLOCATION SITE</b> .....	<b>4</b>
<b>2.1</b>	<b>SITE DESCRIPTION</b> .....	<b>4</b>
<b>3</b>	<b>RESPONSE TO THE DRAFT LOCAL PLAN</b> .....	<b>6</b>
<b>3.1</b>	<b>VISION AND AIMS</b> .....	<b>6</b>
	DRAFT POLICY S1 (SPATIAL STRATEGY) .....	6
	DRAFT POLICY S2 (SETTLEMENT HIERARCHY) .....	10
<b>3.3</b>	<b>NATURAL AND BUILT ENVIRONMENT</b> .....	<b>13</b>
<b>3.4</b>	<b>HERITAGE</b> .....	<b>14</b>
<b>4</b>	<b>CONCLUSION</b> .....	<b>16</b>
<b>4.1</b>	<b>REPRESENTATION SUMMARY</b> .....	<b>16</b>

**Appendix 1** – Map of local authorities where there is a requirement to demonstrate nutrient neutrality

# 1 INTRODUCTION

## 1.1 PURPOSE OF THIS REPRESENTATION

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- 1.1.1 This representation has been prepared on behalf of Vistry Group ('our client') in response to East Hampshire District Council's Draft Local Plan (Regulation 18) Consultation which runs until 4<sup>th</sup> March 2024.
- 1.1.2 Vistry Group have an interest in two adjoining parcels of land known as 'Land at Old Shepherds Farm, Liphook' and 'Land at Devil's Lane, Liphook' (hereafter referred to as 'the Submission Site') and have been promoting the Site for allocation as part of the emerging local plan for some years. For the avoidance of doubt, Vistry Group have merged with Countryside Properties through a combination, and therefore any previous representations submitted by Countryside relates to the same option agreement entered into with the landowner.
- 1.1.3 East Hampshire District Council ('EHDC' or 'the Council') is preparing a new Local Plan with the aim of providing an updated spatial framework and development management policies for the plan area to 2040. The new Plan will replace the adopted Local Plan comprising the Part 1 – Joint Core Strategy and Part 2 – Housing and Employment Allocations documents, along with the saved policies of the East Hampshire District Local Plan: Second Review.
- 1.1.4 For the reasons discussed herein, our client continues to promote the land at Old Shepherd's Farm and Devil's Lane for allocation in the local plan as a sustainable and deliverable housing site to meet local housing needs. This representation considers the merits of the Site in the context of the Council's proposed development strategy, affirms our client's commitment to the Site, and justifies why the site is suitable for allocation within the emerging Local Plan.

## 1.2 BACKGROUND

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- 1.2.1 Initial evidence prepared for the emerging East Hampshire Local Plan commenced in 2017. The Council then undertook two Regulation 18 consultations during 2019, initially on the key issues and priorities for the district, and subsequently a consultation on large development sites in September 2019.
- 1.2.2 However in early 2022, the Council decided to re-evaluate its spatial options for growth and as a result further consultation on key issues and priorities was carried out under Regulation 18 in late 2022 and early 2023. As the next stage in the plan making process, the Council is now consulting on the preferred strategy for meeting the development needs of the district and the Council intends to take the plan forward to Regulation 19 (pre-submission) consultation in Summer 2024, with a submission for Examination currently anticipated in December 2024.



- 1.2.3 Bramshott and Liphook Parish Council have also commenced preparation of a Neighbourhood Plan. Our client, through Countryside Properties, have been in close consultation with the Neighbourhood Plan Steering Group and our client's site has been positively received as a potentially suitable site for future housing development in the parish. At present, it is our understanding that the Neighbourhood Plan will set out strategic and development management policies, however, the plan will not include specific site allocations.

### **1.3 ABOUT VISTRY GROUP**

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- 1.3.1 Vistry Group is one of the leading housebuilders in the country and delivers thousands of homes every year for both the private and affordable market places. Vistry are a young and dynamic business, with successful Housebuilding and Partnerships divisions, and an exciting manufacturing operation called Vistry Works. The Group was formed in 2020 and the integration of Countryside Partnerships into the Vistry family in November 2022, has made Vistry the biggest provider of affordable homes in the UK.
- 1.3.2 The Vistry Group has an unmatched portfolio of brands, each with a rich history and a strong reputation, which includes Linden Homes, Bovis Homes and Countryside Homes. Vistry Group are a Member of the Home Builders Federation (HBF), the principal representative body of the home building industry in England and Wales. The Group has been awarded the 5 Star Rating by the HBF following the latest home building industry's Customer Satisfaction Survey.

## 2 PROPOSED RESIDENTIAL ALLOCATION SITE

### 2.1 SITE DESCRIPTION

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- 2.1.1 The Site relates to a circa 7.2ha area of land that lies immediately adjacent to the eastern boundary of Liphook in East Hampshire.
- 2.1.2 The Site comprises two separate but closely related parcels. The southern parcel (LAA/LIP-019 - Land at Old Shepherds Farm, Liphook) is formed of two rectangular agricultural fields which are physically enclosed by Chiltley Lane to the north-west, Devil's Lane to the north east, Highfield Lane to the south east, and the Churcher's College Junior School & Nursery to the south west.
- 2.1.3 This parcel is currently rural in character but there are clear visual connections with Liphook as a result of existing neighbouring dwellings on Chiltley Lane. Additional built form exists to the north-east where there is a singular dwelling on Devil's Lane; to the south-west in the grounds of Churcher's College; and beyond Highfield Lane where there is a significant area of land and accompanying buildings occupied by Highfield & Brookham Schools.
- 2.1.4 The Site is gently undulating and benefits from naturally enclosed boundaries lined with mature trees and vegetation on all sides, particularly to the south-east, visually separating it from the boundary of the South Downs National Park which lies beyond Highfield Lane.
- 2.1.5 The northern parcel (LAA/LIP-020 - Land at Devils Lane, Liphook) lies immediately north of the junction of Chiltley Lane and Devil's Lane. It is broadly triangular in shape and slopes gently downwards towards the railway line and the residential development of Liphook can be seen beyond to the north. Immediately to the west of the site is a rectangular parcel of land, currently in use as a poultry farm, which is being promoted for residential development by Bloor Homes. A live outline planning application for up to 100 dwellings is currently being considered by the Council under reference 22789/007.
- 2.1.6 Both parcels of the Site can be accessed from opposite sides of Chiltley Lane, near to the junction of Devil's Lane (both adopted roads maintained by Hampshire County Council). Chiltley Lane continues west towards Midhurst Road which provides direct access to the centre of Liphook. Access is also available from Highfield Lane to the south east (an adopted road maintained by West Sussex County Council).
- 2.1.7 The Site lies within walking distance of Liphook which is described in the adopted Local Plan as a 'Large Local Service Centre', containing a range of services and a location deemed to be suitable to accommodate new development. Local shops and services include the Liphook & Liss Surgery, a large Sainsbury's and petrol station, the Liphook Millenium (village) Hall, pubs and eateries, shops and employment opportunities.

2.1.8 Liphook Station is a 10 minute walk away from the Site and provides non-car access to nearby towns or to London, Portsmouth and Southampton further afield. The strategic road network (A23) is conveniently located to the north of the village and is one of the primary routes through the county, connecting London to the south coast.

2.1.9 No Public Rights of Ways exist within the site.



FIGURE 2.1: AERIAL PHOTOGRAPH OF THE SITE (BASE AERIAL: GOOGLE EARTH)

## 3 RESPONSE TO THE DRAFT LOCAL PLAN

### 3.1 VISION AND AIMS

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- 3.1.1 The East Hampshire Local Plan Vision seeks to deliver healthy, accessible and inclusive communities where quality affordable homes, local facilities and employment opportunities in sustainable locations will provide communities with green and welcoming places to live, work and play and respond positively to climate change.
- 3.1.2 We agree with the principles of this aim, and we emphasise the role of suitably located strategic-scale development which in our experience is most effective in delivering the affordable housing and associated community, transport, health and education infrastructure which is necessary in order to create sustainable communities.
- 3.1.3 This is particularly relevant in East Hampshire, which as acknowledged in the draft Local Plan is largely rural in character, a significant portion of which falling within the South Downs National Park. It is therefore clear that the relative sustainability of new housing will be vastly different from a more urban district.
- 3.1.4 As such we would suggest that the Local Plan places stronger emphasis throughout on the need for new development to improve the sustainability of existing settlements through much needed Community Infrastructure Levy contributions and other appropriate developer contributions to improve, amongst other things, the quality and regularity of bus services and the provision or improvement of community facilities and accessible open space.
- 3.1.5 It is also critical to successful planning for sustainable development that more emphasis is given on the continued support for existing upper tier settlements, for example *"the vitality and viability of our existing upper tier settlements will be supported by allowing them to grow and thrive"*. We consider this to be important given the rural nature of the district. Accordingly, it is vital that a significant and proportionate level of growth in the form of additional dwellings to encouraged to support the continued growth and improved sustainability for these important settlements. These representations will set out why we consider that this opportunity is not currently being taken in Liphook.

### 3.2 HOUSING STRATEGY

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#### DRAFT POLICY S1 (SPATIAL STRATEGY)

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- 3.2.1 We support the clear statements made in Section 3 on the need to significantly boost the supply of homes with this being a key Government objective.



- 3.2.2 The NPPF requires that to determine the minimum number of homes, Local Plans should be informed by a local housing needs assessment, conducted using the Standard Method in national planning guidance. EHDC has identified a need for a minimum of 10,982 new homes through the plan period, equivalent to an annualised housing need of 578 dwellings for the Plan Area. However, it goes on to note that the National Planning Practice Guidance acknowledges that authorities “that do not align with local authority boundaries, such as National Parks, can identify a housing need figure using a method determined locally.”
- 3.2.3 With this in mind, EHDC confirms that when looking at a disaggregated approach to the standard method between East Hampshire and the South Downs National Park, the Local Plan area will require 464 homes per annum, or 8,816 homes in total over the plan period. It is noted that the South Downs National Park Authority will need to work through its own process to calculate local housing needs within its boundary. Nevertheless, it is expected that there will be some unmet need in light of the landscape sensitivities of the National Park and this unmet need has been estimated by EHDC as being approximately 14 homes per annum or 266 homes over the plan period. This figure has been accounted for in the draft Local Plan, taking the minimum housing target to 478 homes per annum or 9,082 homes across the plan period.
- 3.2.4 However, we have significant concerns that no assumptions have been made on the unmet needs of other neighbouring authorities (with the exception of the South Downs National Park), despite the very high level of unmet need identified across the South Hampshire subregion set out in the Partnership for South Hampshire Spatial Position Statement (December 2023), as set out in the table below.

<b>Local Authority</b>	<b>Annual Housing Need using Standard Method (dpa)</b>	<b>Total Housing Need 2023-2036</b>	<b>Identified Supply (Commitments, Allocations and Windfall Estimate)</b>	<b>Shortfall/Surplus</b>
East Hampshire (part)	113	1,469	1,275	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	+900
Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603

<b>Local Authority</b>	<b>Annual Housing Need using Standard Method (dpa)</b>	<b>Total Housing Need 2023-2036</b>	<b>Identified Supply (Commitments, Allocations and Windfall Estimate)</b>	<b>Shortfall/Surplus</b>
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	899	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0 <sup>1</sup>
Test Valley (part)	182	2,366	3,109	+743
Winchester (part)	235	3,055	3,055	0
<b>TOTAL</b>	<b>6,037</b>	<b>78,481</b>	<b>64,909</b>	<b>-11,771</b>

- 3.2.5 These figures set an alarming position of under delivery in the South Hampshire area. In particular, it is notable that the authority immediately to the south of the district – Havant – has a significant level of unmet need and this need is unlikely to be met in the short term due to significant delays on the progression of the Havant Local Plan, following the withdrawal from examination in 2022 over concerns on deliverability. The Local Development Scheme published in November 2023 indicates that the submission of the new Havant Local Plan for examination is unlikely to take place until the end of 2025.
- 3.2.6 The NPPF states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 3.2.7 It continues to note that in order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address such matters. These should be made publicly available throughout the plan-making process to provide transparency.

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<sup>1</sup> Set as 0 on the basis that the shortfall is a result of the Urban Uplift required by the NPPF and it would not be appropriate to apportion this shortfall to other authorities.

- 3.2.8 The National Planning Practice Guidance notes that if another authority will not cooperate, or agreements cannot be reached, this should not prevent the authority from submitting a plan for examination. However, the authority will need to submit comprehensive and robust evidence of the efforts it has made to cooperate, and any outcomes achieved; this will be thoroughly tested at the plan examination.
- 3.2.9 Through the Duty to Cooperate process, as noted in the Statement of Common Ground with Chichester, it has been agreed that EHDC has the strongest functional relationship with the adjacent areas of Waverley Borough and Havant largely due to the extent of shared boundary along the north-eastern and southern edges of the district, and the key transportation routes that pass between them. However, it is noted that there is no Statement of Common Ground with Havant as part of the evidence base for the Local Plan consultation and given the close relationship between the two authority areas, this document is vital in understanding local and wider housing needs.
- 3.2.10 The Duty to Cooperate Framework, published in July 2022, indicates that there has been continuous and ongoing engagement between the two authorities in respect of cross boundary and strategic matters, stating in section 10 that Havant Borough Council had identified that it may require assistance in meeting its housing requirements. No further information has been provided on more recent discussions and we would encourage EHDC to publish the latest information on these discussions as part of the Regulation 19 consultation. This is vital in understanding whether EHDC's proposed housing target is appropriate.
- 3.2.11 Furthermore, strategic, cross-boundary working with Havant is even more important as the other nearby districts to Havant are already experiencing significant shortfalls in housing supply, as noted previously in the table above. They are also significantly or entirely affected by the requirement for new residential development to demonstrate nutrient neutrality and offset recreational impact on the Solent protected sites, further slowing down housing delivery in the South Hampshire area. This includes but is not limited to Havant, the southern end of East Hampshire, and the entirety of Portsmouth, Gosport, Fareham, Eastleigh and Southampton. A copy of the map showing the affected authorities is contained at **Appendix 1**.
- 3.2.12 In light of the nutrient neutrality and recreational impact mitigation requirements referred to above, the southern part of the district, south of the national park, is considerably more constrained than the land to the north of the National Park. Indeed, the main road (A3) and railway line running through Hampshire provides direct access to Havant and other coastal towns from the north eastern part of the district, meaning that it would entirely reasonable for those working in South Hampshire to look further inland for new housing. A direct train line is available to Havant from Liphook, for example, in less than 30 minutes.
- 3.2.13 Overall, we have significant concerns that the level of unmet needs of Havant have not been acknowledged in the Local Plan and would encourage this to be reconsidered in the Regulation 19 draft. We do not believe that the 642 surplus

homes proposed in the draft Local Plan, in the context of our observations on the proposed site allocations below, can be delivered. As such, we say that it is critical that EHDC allocates additional sites in the district to cater for some of this unmet need, for the reasons discussed below.

### **DRAFT POLICY S2 (SETTLEMENT HIERARCHY)**

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- 3.2.14 We are supportive of **draft Policy S2** and the proposed definition of Liphook as a higher tier settlement, given the range of shops, services and transport connections available for residents. These shops and services will be supported by additional spending from new residents on allocated sites, strengthening the health of local businesses and encouraging new businesses to establish through the plan period.
- 3.2.15 As noted previously, local transport routes and infrastructure will also be improved through Community Infrastructure Levy payments and appropriate developer contributions that can only be secured through new development. The sustainability and self-sufficiency of these settlements will only improve as a result.
- 3.2.16 We are unclear however why Liphook has been identified as a Tier 2 settlement compared to the singular Tier 1 settlement of Alton. The Local Plan does not distinguish between the two, noting that the “largest levels of growth are expected to be in higher order settlements (Tier 1 & 2) due to their greater access to public transport, services and amenities”.
- 3.2.17 While it is acknowledged that Alton is larger in size than Liphook, Liphook is comparable in terms of the services and facilities available, featuring a wide range of options capable of supporting day to day activities for residents, and excellent road and rail connections further afield. The Revised Settlement Hierarchy Background Paper notes in paragraph 3.9 that support was given in responses to the previous consultation for Liphook’s position within Tier 1 due to the services in the centre of the settlement, its schools and railway station which were thought to be within an accessible distance of the main built-up area. It was also comparable to Alton in terms of accessibility in the Regulation 18 Issues and Priorities Consultation.
- 3.2.18 Notwithstanding the above, it is clear that the number of houses allocated to Liphook (111) falls well short of other Tier 2 settlements, namely Whitehill & Bordon (667 units) and Horndean (320 units). It is also noted that 3 of 5 of the Tier 3 settlements are allocated more than Liphook (Four Marks – 210, Clandean – 180, and Rowlands Castle – 145).
- 3.2.19 Furthermore, of the proposed allocations as a whole, there are a number that are significantly more constrained and vastly less desirable in planning terms than the Submission Site and we are unclear why they have been selected over the Submission Site which does not exhibit these constraints. These include:



- ALT4 (Land at Whitedown Lane, Alton) - this site is physically and visually separated from Alton by the A339 and boundary trees and does not adjoin existing built form. In our view this would be an incongruous extension to the settlement.
- ALT6 (Land at Wilsom Road, Alton) - this site is largely covered by Flood Zone 2 and 3 which is a significant constraint to development.
- ALT8 (Land at Neatham Manor Farm, Alton) - similar to ALT4 this site is physically and visually separated from the settlement by the A31 and would be an incongruous feature in the open rural landscape in this area. While a landscape-led scheme has been proposed, this site is significantly less accessible than the Submission Site and it has no relationship with existing built form.
- W&B3 (BOSC Residential Expansion), W&B4 (Louisburg Residential Extension) and W&B5 (North of Louisburg Employment Proposal) - all of these sites are covered entirely by existing woodland. The development of these sites would result in a significant ecological impact and it is highly unlikely that the mandatory 10% biodiversity net gain could be achieved.

3.2.20 By comparison, the allocation of the Submission Site as a natural and in-keeping extension to an upper tier settlement would be wholly consistent with draft Policy S2 which sets out a presumption in favour of sustainable development within the Settlement Policy Boundary proposed to be extended to accommodate new housing allocations.

3.2.21 In accordance with section S2.3 of this policy, any future development could be designed to respect the setting, form and character of Liphook. It would sit comfortably within the existing suburban context and would not be seen as a discordant extension into the countryside in light of the well established boundary features which are proposed to be enhanced.

3.2.22 Similar to the inspector's conclusions on the Bloor Homes site, the Submission Site would be sustainably located in proximity to existing transport and walking routes to local shops, services and facilities from the outset. These services would be further supported by Community Infrastructure Levy payments and other appropriate developer contributions which would benefit the new residents and the wider community.

3.2.23 Comparatively, it is highly unlikely that the proposed allocations listed above would meet the requirements of section S2.3.

### **Accessibility**

3.2.24 It is also noted that the Council's approach to the 20 minute neighbourhood is proposed to change to reflect a 20-minute round trip i.e. the ability to reach a destination in 10 minutes. Whilst we support the intention to focus new development in the most accessible locations in the district, we urge the Council to not over rely on methodology for assessing accessibility based on existing shops and services as it has the potential to disregard sustainable sites that would in all other aspects be considered appropriate for new development. Indeed this was

acknowledged by EHDC within the previous consultation. It also does not factor in new shops, services and facilities that can be delivered in tandem, which would improve the accessibility of these sites as a result (in addition to adjacent existing residential development).

- 3.2.25 The draft Local Plan is supported by a Living Locally Accessibility Study and Decide & Provide Methodology prepared by Ridge & Partners. However, the evidence within this study, particularly the WSP study referred to on page 16, actually points to a 30 minute neighbourhood as being most appropriate for East Hampshire.
- 3.2.26 In summary, Vistry support the Council's aspirations to promote accessible developments and settlements, and the Submission Site is able to achieve this. However, the methodology adopted is not realistic or appropriate to the existing character of the East Hampshire district and should be revised accordingly so as to not exclude sustainable sites such as the Submission Site to the south east of Liphook.

### **Sustainability**

- 3.2.27 Development on this site would contribute to the achievement of sustainable development as required by draft Policy S2.
- 3.2.28 An economic role includes contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. In this respect, the site is suitable, sustainable, available and deliverable for development, and would help contribute to EHDC's housing need for the Plan period with the provision of a strategic-scale contribution of high-quality new homes of a mix of dwelling sizes, types and tenures. Household expenditure generated by future residents would support economic activity locally and development would also enable the Council and local community to benefit from revenue linked to requested Section 106 contributions.
- 3.2.29 From a social perspective, residential development would cater for the provision of housing in a sustainable location immediately adjacent to housing and supporting infrastructure. The development of well-contained, relatively unconstrained greenfield sites, already strongly characterised by their location within the proximity of existing upper tier settlements, would help avoid the need for more significant large-scale greenfield site releases in more sensitive landscapes that would have a greater level of impact and harm.
- 3.2.30 Likewise, the site has the potential to provide for a range of dwellings that would meet the District need, could provide for a mix of both market and much-needed affordable housing as well as smaller and larger family units which will help maintain a balanced community within the north of the Plan Area.
- 3.2.31 From an environmental perspective, it is acknowledged that the allocation would result in development of a greenfield site. However, it is clear that the housing need in East Hampshire cannot be met by limited urban sites and greenfield

development is inevitably required in such a rural area. The development of a relatively unconstrained greenfield site sustainably located close to services, facilities and public transport connections and at an appropriate and effective density is considered a preferable location in the context of sustainability objectives and simultaneously will make a modest contribution to reducing the need to develop into wider, more ecologically valuable and visually sensitive sites in the countryside.

- 3.2.32 From a wider sustainability perspective, the proposal would not involve the loss of land that is of high ecological value and would not comprise development in an area of high flood risk.

### 3.3 NATURAL AND BUILT ENVIRONMENT

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- 3.3.1 We are supportive of **draft Policy NBE1** and **Policy NBE3** which reflects the Government's mandatory 10% biodiversity net gain. From early experience, the delivery of biodiversity net gain on development sites can be challenging, therefore a higher target than 10% is actively discouraged to avoid delays to the delivery of new housing.
- 3.3.2 These policies are supplemented by draft development management policies **DM1** and **DM2**.
- 3.3.3 From an ecological perspective, the site is not subject to any specific designations and it is anticipated that development of the site can be delivered without incurring any adverse ecological harm. Any development on the site will incorporate substantial landscaping and open space opportunities for the ecological enhancement of the site and delivery of at least 10% biodiversity net gain. This will ensure that any development becomes embedded into the landscape and continues to benefit from and retain the naturally vegetated boundaries which are characteristic of the local area.
- 3.3.4 We also accept the inclusion of **draft Policy NBE4** which states that development within the 400m to 5km buffer of the Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC boundaries must be supported by a Habitat Regulations Assessment setting out the likely significant effect on the integrity of these protected sites.
- 3.3.5 As noted in the draft policy, the type of mitigation will be dependent on the type and size of the proposed development. If required, Suitable Alternative Natural Greenspace (SANG) can be provided within or on land near to the Submission Site (within our client's control) to provide the necessary mitigation. Our client is confident that this can be delivered to mitigate the recreational pressures that may be generated by the proposed development.

- 3.3.6 **Draft Policy NEB10** (Landscape) states that development proposals must conserve and wherever possible enhance the special characteristics, value, features and visual amenity of the Local Plan Area's landscapes.
- 3.3.7 The Landscape Capacity Study (2018) observes that Liphook has a generally well-vegetated edge and little effect on the wider rural character. The report considers it possible that a very small amount of additional development could be accommodated, inter alia, adjacent to the settlement edge provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and local distinctiveness.
- 3.3.8 In line with these observations, the development of the Submission Site could easily be achieved whilst also retaining and enhancing the well vegetated edge to the site which remains characteristic of the local area. This will have the added benefit of retaining the natural screening from the National Park beyond, thereby protecting its immediate setting.
- 3.3.9 With respect to landscaping, an early design masterplan carefully considers the natural features of the site to minimise the visual impact of the proposals which incorporates a landscape-led design approach to green infrastructure, creating meaningful open, green spaces, recreation and children's play space, and high-quality biodiversity and landscape boundary improvements.
- 3.3.10 The above design principles delivered alongside a robust scheme of allocation criteria will ensure that the development can be delivered on the site without significant adverse landscape impact.
- 3.3.11 Any future development of the Submission Site would be prepared in consultation with both the local community and EHDC.

## 3.4 HERITAGE

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- 3.4.1 **Draft Policy NBE14** (Heritage Assets and the Historic Environment) seeks to protect, conserve, and where possible enhance the significance of designated and non-designated heritage assets in accordance with the requirements of the NPPF.
- 3.4.2 As noted previously, the Grade II listed Goldenfield West Lychgate (Listing Entry Number 1094513) lies on the north side of Chitley Lane and is largely screened from the site from existing boundary trees and vegetation.
- 3.4.3 The description of the asset as defined by Historic England is as follows:

*BRAMSHOTT & LIPHOOK CHITLEY LANE SU 83 SW Liphook 6/32 Nos 51 and 53 23/01/86 (Lychgate and Goldenfield Jest) II Two houses, arranged as an irregular group of linked structures. 1891, by Philip Webb and 1905, by Owen Little. Walls of polygonal sandstone rubble with brick quoins, also roughcast and a small area of mock timber frame with plaster infill, some upper walls tile-hung. Tile roof,*



*hipped, half-hipped and gabled, with prominent brick stacks. An unusual combination of varied buildings, of general vernacular form: mostly two storeys, with an attic to a taller rear block, irregular fenestration. Leaded casements. Porch with hipped tile roof, a plainer entrance approached via a roadside lychgate. A timber-framed (clock) tower has a boarded lower stage, a part-pyramid roof overhanging brackets, and surmounted by an open turret, with coupled corner columns and a concave pyramid roof.*

- 3.4.4 The NPPF defines the setting of a heritage asset as “*the surroundings in which the heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve”.* In recent years the original rural setting of this building has changed significantly through the expansion of Liphook and the development of several new homes in the vicinity over the last 50 years.
- 3.4.5 Nevertheless, in order to preserve the rural setting as far as possible, our client would intend to take forward a scheme that includes an area of open green space opposite the property to ensure that built form does not impact on the asset’s immediate setting and to provide natural screening from the built form beyond.
- 3.4.6 The site does not fall within or in proximity to a Conservation Area.
- 3.4.7 A future application would be supported by a detailed Heritage Impact Assessment to ensure that the impacts are appropriately assessed.

## 4 CONCLUSION

### 4.1 REPRESENTATION SUMMARY

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- 4.1.1 This representation has been prepared on behalf of Vistry Group in response to East Hampshire District Council's Draft Local Plan (Regulation 18) Consultation which runs until 4<sup>th</sup> March 2024.
- 4.1.2 Vistry Group have an interest in two adjoining parcels of land known as 'Land at Old Shepherds Farm, Liphook' and 'Land at Devil's Lane, Liphook' (hereafter referred to as 'the Submission Site') and have been promoting the Site for allocation as part of the emerging local plan for some years.
- 4.1.3 In light of the constrained nature of much of the District and the limited development capacity of the existing towns, it will be necessary to support the sensitive expansion of settlements through landscape-led development to deliver the housing and economic development needs of the Plan area. The draft Local Plan seeks to identify appropriate locations for these settlement expansions; however we raise significant concerns regarding the deliverability and appropriateness of these sites in planning terms.
- 4.1.4 Concerns have also been raised within this representation regarding the provision made for the significant shortfall in housing land in the adjacent authority of Havant and the lack of information concerning more recent discussions on cross-boundary collaboration. These concerns are heightened in light of the observations made on the proposed housing allocations.
- 4.1.5 We do not believe that the development capacity of Liphook has been maximised and we are unclear why the land south-east of the settlement has been excluded as it is much less constrained than some of the proposed allocations and its development would represent a logical and sustainable development extension to the existing settlement area. Such locations are where the associated benefits of new development, including associated affordable housing, infrastructure and community facilities may be best delivered and are most effectively achieved through the Plan-making system.
- 4.1.6 This representation considers the merits of the site allocation in the context of the District's future development needs and affirms our client's commitment to both delivery of the site and continued engagement with the Local Planning Authority. Given the clear consistency of our client's site with the preferred growth strategy, and the concerns raised above, we respectfully request that the land is reconsidered for allocation in the emerging Local Plan.
- 4.1.7 In addition to being sustainable, the site is under single control, with no known viability or legal issues, and there are no impediments to the site being delivered for housing in the early plan period.

# APPENDIX

1







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European protected sites requiring nutrient neutrality strategic solutions

Scale: 1:340,000

**Component SSSIs of Solent: Includes Chichester and Langstone Harbours SPA/Ramsar, Solent and Southampton Water SPA/Ramsar, Solent Maritime SAC, Portsmouth Harbour SPA/Ramsar**

- Local Authorities
- SSSI subject to nutrient neutrality strategy
- Nutrient neutrality SSSI catchment
- National Parks

