

**REPRESENTATIONS ON BEHALF OF LAND AT BLACKBERRY LANE, FOUR MARKS  
PART OF LAA FM-041**

EAST HAMPSHIRE LOCAL PLAN 2021-2040; ISSUES AND PRIORITIES

REGULATION 18 PART 2 CONSULTATION



## 1. INTRODUCTION

### Site Promotion

1.1 On behalf of Land at Blackberry Lane, Four Marks (part of “FM-041”), Falcon Developments (SE) Ltd (“Falcon”) is pleased to have the opportunity to respond to the East Hampshire District Council (“EHDC”) Local Plan 2021-2040; Issues and Priorities Regulation 18 Part 2 (“Draft Plan”) consultation on those questions relevant to FM-041.

1.2 Falcon has promoted the landholding at FM-041 for a residential allocation since the EHDC Local Plan (Reg 18) consultation in 2018.

1.2.1 FM-041 forms part of the landholding previously reviewed under LAA/FM-041.

1.2.2 Throughout the process, EHDC Policy Officers (“Policy”) have been provided with various layout & design work, technical reports, and Call for Sites submissions to support the allocation and delivery of residential housing at the site.

1.2.3 FM-041 has also been promoted in conjunction with the Large Development Site consultation in 2019 as part of the ‘Four Marks South’ (“FMS”) consortium.

1.2.4 A pre-application for 195 dwellings and associated community facility was submitted on FM-041 in April 2023 with comments provided by the Case Officer.

1.2.5 The pre-application is ongoing, and a revised submission has subsequently been designed. This submission formed the basis of a pre-application meeting on 7<sup>th</sup> February 2024 for which a response from EHDC is imminently due. The information submitted at this pre-app included.

- Proposed Layout for 100 Dwellings Focusing the scheme on the northern section of FM-041 to accord with the settlement pattern/character of residential housing along Blackberry Lane
- Providing a single point of access from Blackberry Lane
- Reducing the housing number to 100 dwellings.
- Reducing the quantum of land being proposed.

1.3 The following plans can be found within the Appendices of the Representation

- |  |            |
|--|------------|
| • Site Promotion Plan                                | Appendix 1 |
| • FM-041 Layout for 100 Homes                        | Appendix 2 |
| • Proposed Residential Allocations Plan – Four Marks | Appendix 3 |

### Policy

1.4 The EHDC Local Development Scheme anticipates submission of the Draft Plan in December 2024. Consequently, the representations considers the Draft Plan having regards to the requirements of National Plan Policy Framework 2023 (NPPF) as this will form the basis of the examination to determine whether it is ‘sound’.

1.5 FM-041 response is made in accordance with the legal and procedural requirements of paragraph 35 of the NPPF to test whether Plans are considered ‘sound’ as outlined below.

- **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.

Structure of Representations

1.6 The representations respond to relevant sections to FM-041 as outlined below and should be read in conjunction with the site’s promotional work by Falcon.

- Section 2 – Vision and Objectives.
- Section 3 – Managing Future Development.
- Section 4 - Responding to the Climate Emergency
- Section 5 – Creating Desirable Places.
- Section 6 – Homes for All.
- Section 7 – Site Allocations.
- Section 8 – Summary and Conclusions.

1.7 In addition to the consultation documents of the Draft Plan the representations consider

- |  |      |
|--|------|
| • Interim Settlement Policy Boundary Review Background Paper   | 2024 |
| • Report 1 – East Hampshire Accessibility Study                | 2024 |
| • Land Availability Assessment (LAA)                           | 2023 |
| • Housing and Employment Development Needs Assessment (HEDNA)  | 2022 |
| • Medstead & Four Marks Neighbourhood Plan 2015 – 2028 (MFMNP) | 2016 |

Allocation of FM-041

1.8 The documents support EHDC evidence base as part of this consultation in determining that the revised proposal for FM-041 should be identified for allocation within the Local Plan.

1.9 The allocation of FM-041 should either be included as an additional allocation to those identified in Draft Plan, or in replacement of allocations FMS1 or FMS4 being proven a more sustainable location for growth within Four Marks.

1.10 The representations only respond to questions relevant to FM-041 as part of this consultation and should be read in conjunction with the site’s promotional work by Falcon.

Falcon welcomes the continued engagement with Policy regarding the suitability of FM-041 for allocation within the Local Plan.

- 1.11 Falcon welcomes the continued engagement with Policy regarding the suitability of FM-041 for allocation within the Local Plan.

## 2. VISION AND OBJECTIVES

- 2.1 Falcon supports EHDC overall Vision and Objectives of the Draft Plan, alongside the strategic objectives to create communities through sustainable development in suitable locations, delivering Homes for All.
- 2.2 The Vision states that it is ambitious however this does not go far enough to meet the full need of the district whereby housing delivery figures have been restricted when there are no significant constraints to development.
- 2.3 The site at FM-041 would provide an additional housing allocation to support the Vision and help address the shortfall in the District's needs. This is discussed in detail in section 7 of this Representation.

## 3. MANAGING FUTURE DEVELOPMENTS

- 3.1 Falcon support Policy S1 Spatial Strategy and the provisions for the delivery of at least 9,082 new homes over the plan period (equating to 478 homes per annum). However, with an increase in national housing population figures, further means testing is required to ensure the soundness of this figure as a minimum, especially when considering unmet need of surrounding areas and the South Downs National Park Authority (SDNPA)
- 3.2 To deliver a sufficient supply of homes the Spatial Strategy S1.1 should accord with NPPF paragraphs 60 and 61 using the standard method as an advisory starting-point and then comparing this to the local housing need figures in the most up to date evidence base. In this case the HEDNA concludes that 517 homes per annum, which is an additional 39 homes per annum above that proposed in the Draft Plan.
- 3.3 Policy S2 is supported including any revisions to the settlement hierarchy and we agree that S1.4 of the policy that development should be distributed in accordance with the spatial strategy. The recognition of Tier 3 settlement providing a focal point for the surrounding villages and rural areas in terms of service is also supported with Four Marks being capable of accommodating additional housing figures.
- 3.4 As Four Marks is considered a sustainable location for growth, Falcon proposes FM-041 as *the most sustainably located* site within this settlement and should be identified for allocation within the Draft Plan. This is discussed further in Section 6.

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

- 4.1 Falcon are supportive of the Draft Plans ambitions within Policy CLIM1 for future development to contribute to mitigating climate change and meeting EHDC Climate Emergency response to meet the requirements of CLIM1.2.
- 4.2 Falcon support a transitional period towards a net zero development in line with CLIM2, CLIM3, CLIM4 and CLIM5 and BEE-011 would be capable of delivering a highly sustainable, energy efficient scheme that accords with the requirements of this policy.
- 4.3 Overall, the Draft Plan should consider each proposal on a case-by-case basis, to ensure that the viability of any development scheme and particular allocation is not prevented due to undeliverable requirements. To achieve net zero housing, will take a period of time through the design and construction methods that also create additional build costs that could impact the viability and deliverability of sites.
- 4.4 The setting of FM-041 would support the creation of further work in the design to support east-west layout forms of development to accord with passive design principles and the installation of solar panels to help tackle the climate emergency.

#### **5. CREATING DESIRABLE PLACES**

- 5.1 Falcon supports Policy DES1 and the aspirations within Policy DES1.1 to achieve the sub policies (a – h) ensuring that all new development is cohesive with the surrounding character of the areas and creating communities where people aspire to live.
- 5.2 The location of FM-041 would also ensure an allocation would accord with sub-paragraph (g) and allowing residents to “live locally” and access services and facilities through walking/cycling with the entrance to the site being located approx. 307m from the village centre (see Appendix 3). This is despite Four Marks being a Tier 3 settlement and the policy focused on Tier 1 and Tier 2 settlement, providing further evidence as to why FM-041 should be considered for allocation.
- 5.3 Policy’s DES2 and DES3 are supported to ensure that any forthcoming allocation is integrated within the existing character and surrounding of the locality. FM-041 has undergone extensive Pre-Application advice with Case Officers to focus on the design of a scheme for 100 dwellings and how this addresses the surrounding character of Four Marks to integrate itself within the community. An allocation at this location would accord with Policy DES2 and DES3 ensuring the proposed scheme can accommodate additional housing and respect the existing local character of Four Marks.
- 5.4 Falcon also support Policy DES4 Design Codes. The Draft Plan should identify the conditions for each settlement size and housing allocation to ensure there is a consistent understanding of the requirements set out within each local area.

## 6. HOMES FOR ALL

6.1 Falcon supports EHDC proposal to deliver 3,500 new homes including a 10-15% buffer to allow for flexibility, on the basis that some housing allocations may not be delivered due to potential unforeseen issues within the plan period.

Policy H1 is also supported when identifying approximate numbers of homes to be distributed across the various Tiers of settlement.

6.2 In line with paragraph 3.2 of this Representation, it is encouraged that EHDC undertake further means testing to ensure that the overall housing figure within the Plan is robust and in accordance with NPPF paragraph 60.

6.3 Policy H2 is supported to ensure a range of house types, tenures and sizes are provided and meet local needs. Flexibility should be afforded within the policy to allow for the character of the surrounding areas in line with Creating Desirable Places section. Further consideration needs to be given over the deliverability of all private dwellings to meet M4 (2) standards, especially when considering the delivery of apartment blocks or maisonettes.

6.4 Policy H3 is supported, subject to further means testing and robustness of viability for a 40% threshold for all applications above 10 dwellings, rather than an increase in overall housing numbers to be delivered within the Draft Plan.

6.5 An allocation at FM-041 would support the Homes for All section having undertaken several design iterations through the Pre-Application process to confirm its deliverability and lack of onsite planning policy constraints.

- H1 – housing identified within a Tier 3 settlement.
- Policy H2 – the ability for the location and design of scheme to deliver a range of house types, tenures and sizes.
- Policy H3 – the delivery of 40% affordable housing due to being an unconstrained site and would not require any viability assessment.

## 7. SITE ALLOCATIONS

7.1 The Draft Plan proposes 42 sites for allocation that are set out in broad accordance with the Spatial Strategy Policy S1 and Settlement Hierarchy of S2.

### Four Marks

7.2 Four Marks as a Tier 3 settlement is proposed to take 210 homes and whilst this figure is supported as a *minimum figure*, the evidence base of the LAA and Accessibility Study indicate that further housing could be accommodated within Four Marks.

7.3 It is understood the Draft Plan will allocate the most suitable and sustainable housing site for development rather than MFMNP which was adopted in 2016 and has not since been updated.

7.4 As a Tier 3 settlement the locality surrounding the A31 as a key transport corridor and has a range of facilities and services, as well as surgeries, primary school, village hall, leisure pitches and a forthcoming community hall. Clearly as a Tier 3 settlement, the location can accommodate further housing growth when considered against the lack of strategic planning constraints.

7.5 When considering the strategic policy constraints, growth within Four Marks should be focused on the south of the settlement where no major constraints exist in comparison to the other areas, as per *Figure 12.20: Strategic Environmental Constraints for New Development in and around Four Marks*.

- North of the site is restricted by the Watercress railway line that only has two accesses under the bridges and capacity issues have been identified for any large-scale growth through the EHDC Large Development Site consultation process.
- West of the settlement is the River Itchen catchment that requires nutrient neutrality.
- East of the settlement is the South Downs National Park, where the SDNPA will be responsible for identifying their own housing allocations.

7.6 The Accessibility Study focuses on development within the *20-minute neighbourhood principles* and concludes that it should be applied to East Hampshire to ‘help maximise the potential for Living Locally as this meets EHDC’s Corporate Strategy and aspirations’.

In line with the Spatial Strategy of the Draft Plan, sustainable locations such as FM-041 in Tier 1-3 settlements should be the focus of development.

*Proposed New Sites in Four Marks & Land at Blackberry Lane, Four Marks – FM-041*

7.7 The Draft Plan identifies five new sites to accommodate growth in Four Marks, with three of those sites specifically identified for residential housing.

- |  |            |
|--|------------|
| • FMS1 – Land west of Lymington Barn               | 90 homes.  |
| • FMS2 – Land rear of 97-103 Blackberry Lane       | 20 homes.  |
| • FMS4 – Land south of Winchester Road, Four Marks | 100 homes. |

7.8 The land at FM-041 is identified as being suitable for 100 dwellings following extensive promotion within the Draft Plan and Pre-Application engagement with Case Officers. The promotion plan is in [Appendix 1](#) with the pre-application layout design at [Appendix 2](#).

7.9 The locality around FM-041 and relationship to the Four Marks settlement, is evidenced as the most appropriate location to accommodate growth, due to its closer proximity to services and amenities within the centre of Four Marks, as well as the strategic policy constraints identified within section 7.4.

- 7.10 FMS1 is proposed for 90 dwellings with the major strategic constraints of over 50% being included within the River Itchen catchment and requiring nutrient neutrality mitigation, as well as being located within the South Medstead side of the wider Four Marks settlement and requires highways access under the Watercress line railway bridge to access the A31/Village Centre.

In addition to strategic constraints, the site is a large square of land that has a poor relationship to the settlement boundary and surrounding character, with further ranging landscape views. The lack of enclosure, incongruousness with the settlement boundary and the fact the site is over 700m further walk from the village/Local Centre (as identified in [Appendix 3](#).) evidence the site to be a less sustainable location for housing and less suitably located for the provision of affordable homes, than an allocation at FM-041.

On the above basis an allocation at FM-041 should replace the proposed allocation at FSM1.

- 7.11 FMS2 is proposed for allocation of 20 dwellings along Blackberry Lane, which is the same highways as FM-041. As part of the technical evidence base for FM-041 a Transport Note was completed by Stuart Michael Associates that advised that there was sufficient *existing capacity* at both the A31/Lymington Bottom junction and the A31/Telegraph Lane junction to accommodate up to 200 homes.

An allocation at both FMS2 and FM-041 would therefore be technically deliverable and in line with the most suitable location of growth within Four Marks being toward the south of the settlement, Falcon support the proposed allocation at FMS2 in accordance with an allocation at FM-041.

- 7.12 FMS4 – Land south of Winchester Road, is proposed for an allocation of 100 dwellings. Whilst the site is situated along the A31, it is at the extremities of the village and would offer no discernible benefit to Four Marks or improvements in infrastructure apart from the delivery of residential housing.

As identified within [Appendix 3](#) the location is over 1.44km (0.9 miles) away from the village centre and amenities, which would require more private car journeys into the village centre to access amenities and be detrimental to the inhabitants of onsite affordable housing who may rely on public transport. The unfavourable impact on climate change between FMS4 and FM-041 should therefore be considered when selecting appropriate housing sites within the village.

On the above basis an allocation at FM-041 should replace the proposed allocation at FSM4 due to it being more sustainably located, climate impact reducing and better suited for the location of affordable housing near the village centre.

ALT8 – Land at Neatham Manor Farm, Alton

- 7.13 ALT8 is a new strategic allocation being proposed by EHDC in the Draft Plan. Previous versions of the Draft Plan have included alternative sites in Bentley and Chawton Park Farm, with both proposals being removed from consideration due to a lack of supportive evidence



base, technical issues and deliverability. The proposal would need to be fully tested to ensure that the ambition of approx. 1000 homes and associated infrastructure, amenities etc. is both achievable and deliverable.

Due to ALT8 only recently having been proposed by EHDC, it is unlikely that a robust enough design framework, technical reports and infrastructure requirements can guarantee the delivery of all the proposed homes. This leaves the Draft Plan open to further scrutiny and risk of being found ‘unsound’.

Where there are other opportunities within Tier 1 – 3 settlements, such as Four Marks that are unconstrained and can immediately deliver housing, such as FM-041, these sites should be considered for allocation especially when they are complete conformity with the *20 minute neighbourhood principles*.

Non-strategic allocations, such as FM-041 would also deliver housing at a quicker rate, maintaining EHDC land supply and meeting local housing needs, as larger strategic sites of this nature will take longer to come forward and deliver homes.

Falcon would therefore encourage EHDC as part of the Draft Plan to allocate further new sites within Four Marks as higher-ranking Tier 3 settlement, to safeguard against any delays in the delivery of ALT8, subject to the necessary technical due diligence.

FM-041 would represent an available, achievable and deliverable site.

### Accessibility Study

7.14 Within the Accessibility study FM-041 Site Reference is identified as LAA/FM-041.

LAA/FM-041 refers to the previous larger site that encompassed land from Blackberry Lane to Alton Lane and was reviewed based on a dual access at either highway, as well as being proposed to deliver 195 dwellings.

Through the scoring matrix of the Accessibility Study, it was identified that LAA/FM-041 was perceived as two different landholdings, as per *Table 5.2 – Living Locally Accessibility Score (DO Sites) – Lowest Scores*, which scored the site with an Average Score of 12 based on a Max Score of 19 (Blackberry Lane) and Min Score of 7 (Alton Lane).

Subsequently as part of this Representation and the ongoing promotion of the site, FM-041 has been reduced in size to 100 dwellings and focused on the Blackberry Lane half of the site that is higher performing and more sustainable, according to the Accessibility Study.

Moving forward the evidence base for LAA/FM-041 should be assessed based on an Average Score of 19. The site would also be within 400m walking distance of “Station Approach” bus stop in the village centre as evidenced in Appendix 3.

Consequently, the Accessibility Study requires updates to the following sections of the Evidence Base.

<b>TABLE</b>	<b>ACCESSIBILITY STUDY Current position</b>	<b>ACCESSIBILITY STUDY Revised position</b>
5.2	Average Score 11 and in Lowest Scores	Average Score 19 & joint 5th rated site
5.3	Minimum Hexagon Score 7	Remove
5.4	Not included	Included - Average Score 19 & 4th rated site
5.5	Average Score 11	Remove
5.6	Average Score 11	Average score 19 & 2nd rated site
6.1	Not included	Included - Average Score 19 & joint 5th rated site
6.2	Average Score 11	Remove
6.3	Not included	Included - Average Score 19 & joint 4th rated site
6.4	Average Score 11	Remove
APPENDIX D	Score Range 12 (range between 7 & 19)	Score Range 19 (no range) Average Score unknown
APPENDIX E	Average Hexagon Score 7	Remove

As an overall score LAA/FM-041 would be comparable with LAA/FM-008, which is the proposed allocation FMS2 and would score higher than both proposed allocation FMS1 (LAA/MED-022) with an average score of 8 (and in the lowest sector), as well as FMS4 (LAA/013) with an average score of 11, highlighting the greater sustainability credentials of FM-041.

- 7.15 The Accessibility Study supports the Evidence Base of the Draft Plan and what is considered to support 'living locally'. The Example Hexagons – 10 and 15-minute Walking and Cycling Isochrones in Appendix D have incorrectly identified the centre of Four Marks, which skews the various isochrones in support of FMS1 and FMS4. The centre of the Hexagon focuses incorrectly on a residential area of Churchill Close (see *Fig 1*) located approx. 400 m to the southwest of Four Marks villages main shops, amenities, and transport facilities.

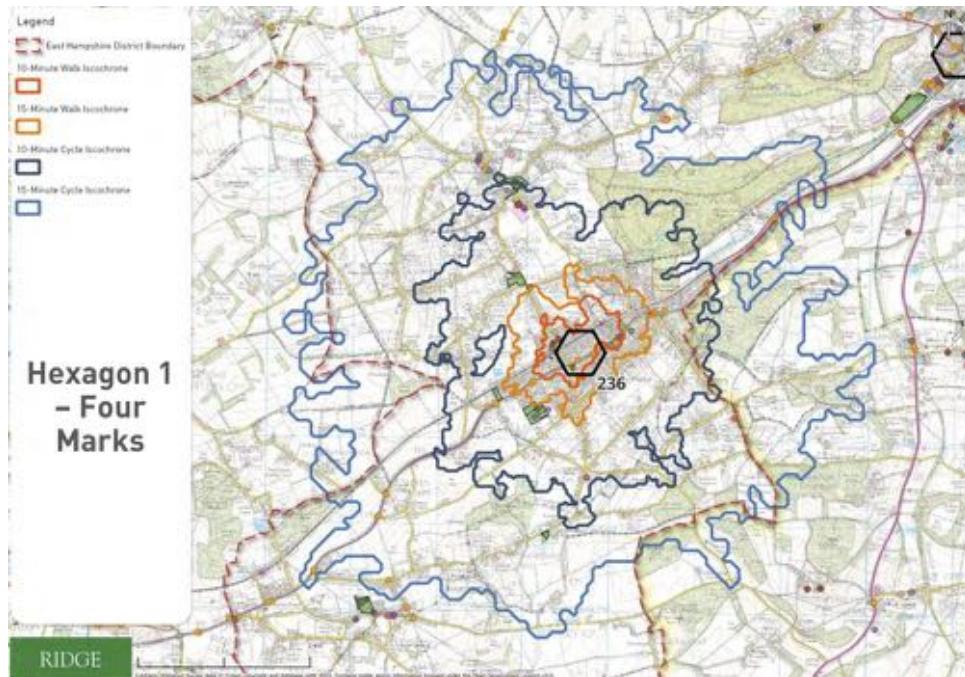


Fig 1 – Source Report 1: East Hampshire Accessibility Study

7.16 As a result of the incorrect starting point for the Hexagon, the walking and cycling isochrones are distorted and more favourable towards the proposed allocations of FMS1 and FMS4. If the Hexagon was correctly located around the centre of Four Marks village, with the amenities and services, FMS1, FMS2 and particularly FMS4 would be considered less sustainable within the Accessibility Study. FM-041 sustainability and relationship to the centre of Four Marks village would be greatly improved to within the 10-minute-walk-isochrone, especially as the existing Public Right of Way is used.

7.17 Falcon have considered the revised impact of the Example Hexagon for Four Marks, if this was correctly located around the village core and this can be found in the *Proposed Residential Allocations Plan – Four Marks* plan at [Appendix 3](#). The table at *Fig 2* compares and contrasts FM-041 (green) and each of the New Site allocations (purple) with the increased distance highlighted in red.

PROPOSED SITE	WALKING DISTANCE (m) to edge of Local Centre	LINEAR DISTANCE (m) to edge of Local Centre
FM-041	307	270
FMS1	1105 +788	919 +649
FMS2	789 +482	677 +407
FMS4	1433 +1,106	1528 +1,258

Fig 2 – FM-041 Comparison of Walking & Linear Distances against FSM1, FSM2 and FSM4.

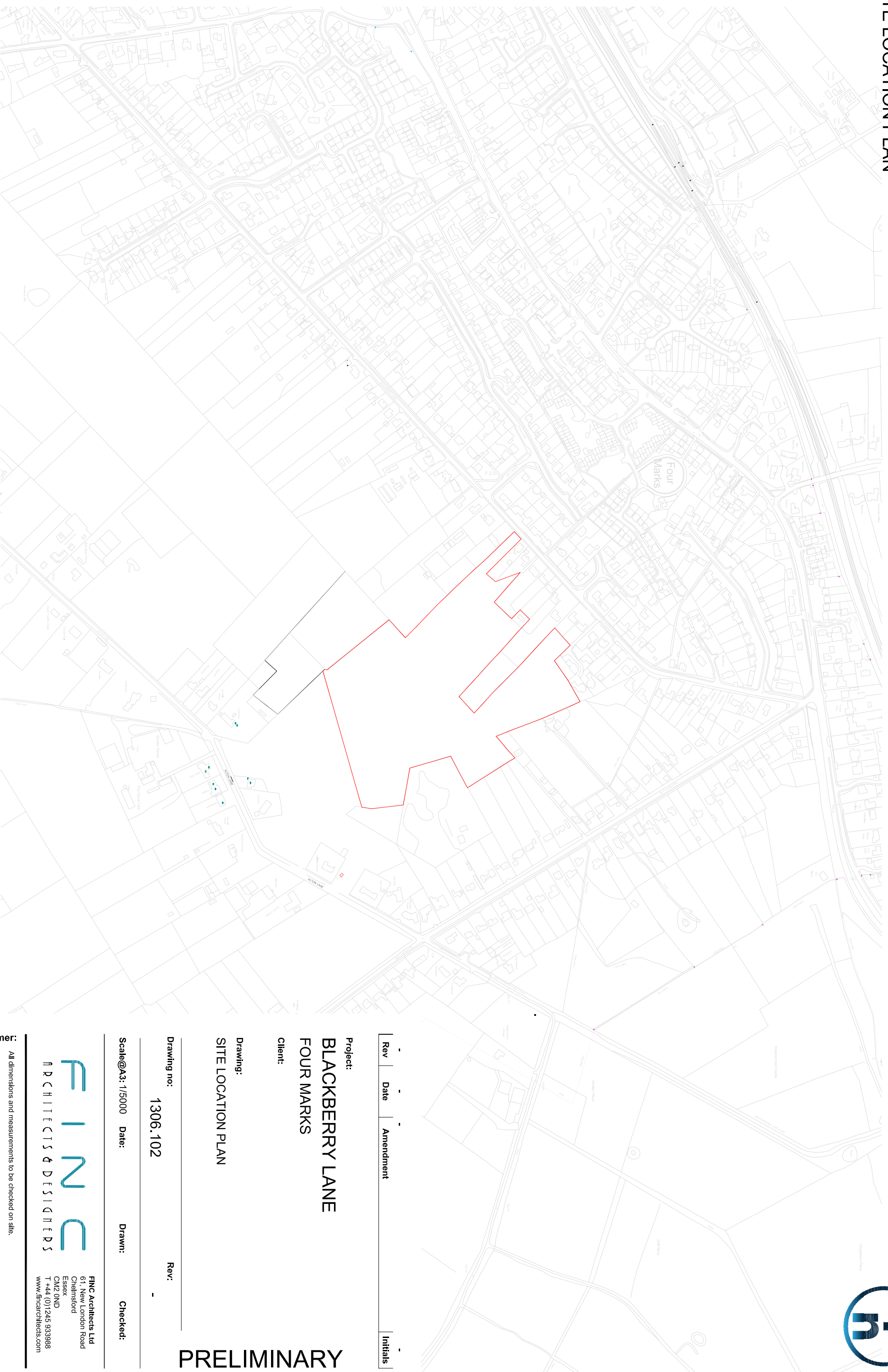
When comparing both walking and linear distances, FM-041 is substantially more sustainably located to the village core than all three of the New Sites allocations, and most notably FMS1 and FMS4. It can therefore be concluded that in terms of the Accessibility Study, FM-041 is a more sustainable site than any of the current Four Marks allocations in the Draft Plan.

- 7.18 As part of the Evidence Base the position of the Hexagon within Four Marks for the Accessibility Plan should be *corrected* and the sustainability credentials *updated* for FMS1, FMS3, FMS4 and FM-041, correctly updated in line with the evidence in Appendix 3.
- 7.19 In line with the supporting Evidence Base of the Accessibility Study and overall sustainability credentials, the site at FM-041 would become one of the top ten Development Options that *'have the most potential to achieve high 'living locally' accessibility'*.
- 7.20 FM-041 is justified for an allocation within the Draft Plan, as either an **additional** allocation, or as a **replacement** allocation for FMS1 or FMS4 within Four Marks.

## 8. CONCLUSION

- 8.1 The Representations have been prepared by Falcon in relation to FM-041 to respond to the policies of the Draft Plan, where appropriate and support an allocation of 100 dwellings within the next stage of the Draft Plan.
- 8.2 The Spatial Strategy aims to focus the core of development in line Tiers 1-3 of the Settlement Hierarchy with Four Marks being one of highest scoring Tier 3 settlements. Four Marks is suitable to take further growth, as well as any shortfalls from Tier 1 and Tier 3 settlements, especially considering the concerns raised with the overall delivery numbers at ALT8.
- 8.3 The Accessibility Study is required to be updated in accordance with Appendix 3 to provide a robust and supportive evidence base to deliver a *sound* Plan. When correctly locating the Hexagon for Four Marks, FM-041 as a location would score higher than the draft allocations of FMS1, FMS2 and FMS4 in according with the 'living locally' accessibility and the *20-minute neighbourhood principles*.
- 8.4 In accordance with overall ***Vision and Objectives of the Draft Plan*** and ***Policy S1 Spatial Strategy***, FM-041 should be corrected to become one of the top ten Development Options that have the most potential to achieve high 'living locally' accessibility within EHDC.
- 8.5 The proposed site at FM-041 has proven to be a more sustainable and suitable location for residential housing allocation than the new sites of FMS1 and FMS4. It is therefore proposed that FM-041 is selected as a **replacement allocation** in the next stage of the Local Plan, or at the very least an **additional allocation** in a Tier 3 settlement that can support further growth.
- 8.6 FM-041 would also be able to deliver an energy efficient development that would integrate renewable and low carbon energy to reduce carbon emissions & work towards a transitional net zero requirement. The scheme would be designed to support passive design principles and the installation of solar panels to help tackle the climate emergency.
- 8.7 Falcon are committed to working closely with EHDC and Officers to secure an allocation at FM-041 in the next stage of the Draft Plan.

# BLACKBERRY LANE, FOUR MARKS SITE LOCATION PLAN



Rev	Date	Amendment	Initials

**Project:**  
**BLACKBERRY LANE**  
**FOUR MARKS**

**Client:**

**Drawing:**  
**SITE LOCATION PLAN**

**Drawing no:**  
**1306.102**

**Rev:**

**Scale@A3: 1/5000 Date:** **Drawn:** **Checked:**



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All dimensions and measurements to be checked on site.

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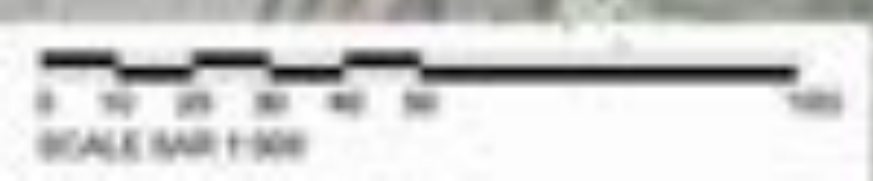
**PRELIMINARY**



-  **WPA - Local Centre**
-  **Full right of way**
-  **Proposed allocation for 200/201 of Blackberry Lane (200 dwellings)**
-  **Existing boundary to local centre for Proposed Allocation for 200/201 - 200m**
-  **Proposed boundary from field to north of 200/201 - 200m**
-  **WPA - Local Centre of Blackberry Lane (200 dwellings)**
-  **Existing boundary to local centre for Proposed Allocation for 200/201 - 200m**
-  **Proposed boundary from field to north of 200/201 - 200m**
-  **WPA - Local Centre of Lavender Hill (200 dwellings)**
-  **Existing boundary to local centre for 200/201 - 200m**
-  **Proposed boundary from field to north of 200/201 - 200m**
-  **WPA - Local Centre of 201 Blackberry Lane (200 dwellings)**
-  **Existing boundary to local centre for 200/201 - 200m**
-  **Proposed boundary from field to north of 200/201 - 200m**



PROW



DATE	10/20/2010
BY	CHRISTOPHER STANLEY
FOR	PROW
PROJECT	BLACKBERRY LAKE, FOUR QUARTS
SCALE	1:500
DATE	10/20/2010
BY	CHRISTOPHER STANLEY
FOR	PROW
PROJECT	BLACKBERRY LAKE, FOUR QUARTS
SCALE	1:500

**REPRESENTATIONS ON BEHALF OF LAND AT WYARDS FARM**

**LAA BEE-011**

EAST HAMPSHIRE LOCAL PLAN 2021-2040; ISSUES AND PRIORITIES

REGULATION 18 PART 2 CONSULTATION





## 1. INTRODUCTION

### Site Promotion

- 1.1 On behalf of Land at Wyards Farm (BEE-011”), Falcon Developments (SE) Ltd (“Falcon”) is pleased to have the opportunity to respond to the East Hampshire District Council (“EHDC”) Local Plan 2021-2040; Issues and Priorities Regulation 18 Part 2 (“Draft Plan”) consultation on those questions relevant to BEE-011.
- 1.2 Falcon is promoting the landholding at BEE-011 for a residential allocation in the Draft Plan, as an extension to allocation ALT4 to deliver a more comprehensive development and a definitive boundary to the Beech/Alton non-coalescence area.
- 1.3 In support of BEE-011 the following plans can be found within the Appendices of the Representation

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|---|------------|
| • Land Promotion Plan                                   | Appendix 1 |
| • Proposed Layout for 80 Dwellings                      | Appendix 2 |
| • ALT4 & BEE-011 - Proposed Allocation                  | Appendix 3 |
| • BEE-011 & Revised Allocations in Wider Context        | Appendix 4 |
| • Proposed Revision to Beech/Alton non-coalescence area | Appendix 5 |

### Policy

- 1.4 The EHDC Local Development Scheme anticipates submission of the Draft Plan in December 2024. Consequently, the representations considers the Draft Plan having regards to the requirements of National Plan Policy Framework 2023 (NPPF) as this will form the basis of the examination to determine whether it is ‘sound’.
- 1.5 BEE-011 response is made in accordance with the legal and procedural requirements of paragraph 35 of the NPPF to test whether Plans are considered ‘sound’ as outlined below.
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  - **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.

Structure of Representations

1.6 The representations respond to relevant sections to BEE-011 as outlined below and should be read in conjunction with the site’s promotional work by Falcon.

- Section 2 – Vision and Objectives.
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1.7 In addition to the consultation documents of the Draft Plan the representations consider

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| • Housing and Employment Development Needs Assessment (HEDNA) | 2022 |
| • Beech Neighbourhood Development Plan 2019–2028 (BNDP)       | 2021 |

Allocation of BEE-011

1.8 The documents support EHDC evidence base as part of this consultation in determining that the revised proposal for BEE-011 should be identified for allocation within the Draft Plan.

The site is 7.7 hectares in size with the northern 4 hectares provisioned for residential housing at a density of 20dph, and the remaining 3.7 hectares of land suitable for the creation of ecological and biodiversity to create a Biodiversity Net Gain in excess of 10% and the potential for wider public benefits with AP/LEAP or allotments.

Whilst the Site is situated within Beech Parish, the site has a closer relationship with the built-up area of Alton settlement boundary, similarly to the proposed allocation at ALT4.

1.9 BEE-011 should be considered in combination with ALT4 to provide a more definitive edge to the western section of Alton settlement and the creation of a strong defensible boundary for a revised Beech/Alton non-coalescence area. Allocation of both BEE-011 and ALT4 would deliver a more comprehensive development as evidenced in [Appendix 3](#).

1.10 The representations only respond to questions relevant to BEE-011 as part of this consultation and should be read in conjunction with the site’s promotional work by Falcon.

1.11 Falcon welcomes the continued engagement with Policy regarding the suitability of BEE-011 for allocation within the Draft Plan.

## 2. VISION AND OBJECTIVES

- 2.1 Falcon supports EHDC's overall Vision and Objectives of the Draft Plan, alongside the strategic objectives to create communities through sustainable development in suitable locations, delivering Homes for All.
- 2.2 The Vision states that it is ambitious however this does not go far enough to meet the full need of the district whereby housing delivery figures have been restricted when there are no significant constraints to development.
- 2.3 The site at BEE-011 would provide an additional housing allocation to support the Vision and help address the shortfall in the District's needs, as well as the unallocated housing within the Alton area.

## 3. MANAGING FUTURE DEVELOPMENTS

- 3.1 Falcon support Policy S1 Spatial Strategy and the provisions for the delivery of at least 9,082 new homes over the plan period (equating to 478 homes per annum). However, with an increase in national housing population figures, further means testing is required to ensure the soundness of this figure as a minimum, especially when considering unmet need of surrounding areas and the South Downs National Park Authority (SDNPA)
- 3.2 To deliver a sufficient supply of homes the Spatial Strategy S1.1 should accord with NPPF paragraphs 60 and 61 using the standard method as an advisory starting-point and then comparing this to the local housing need figures in the most up to date evidence base. In this case the HEDNA concludes that 517 homes per annum, which is an additional 39 homes per annum above that proposed in the Draft Plan.
- 3.3 Policy S2 is supported including any revisions to the settlement hierarchy and we agree that S1.4 of the policy that development should be distributed in accordance with the spatial strategy.
- 3.4 Whilst BEE-011 is situated within Beech Parish (being a Tier 5 settlement) the site has a closer relationship to the Alton (Tier 1 settlement), due to being.
  - Located adjacent to ALT4
  - Located on Basingstoke Road, which leads in to Alton and not Medstead Road that forms the settlement of Beech
  - Separated by a linear distance of over 300m from the Beech settlement boundary.

On the above basis, and in the same regard that the Draft Plan considers ALT4 to form part of the Alton settlement (despite being in Beech Parish) these representations consider the site to conform with an extension of development to the town of Alton and therefore support Alton as a Tier 1 settlement.

3.5 Alton is the most sustainable location for growth with 1,700 new homes proposed for the location. Falcon proposes BEE-011 to be identified for allocation within the Draft Plan alongside the existing new sites, to ensure that deliverability of the proposed number of new homes. This is discussed further in Section 7.

#### 4. RESPONDING TO THE CLIMATE EMERGENCY

- 4.1 Falcon are supportive of the Draft Plans ambitions within Policy CLIM1 for future development to contribute to mitigating climate change and meeting EHDC Climate Emergency response to meet the requirements of CLIM1.2.
- 4.2 Falcon support a transitional period towards a net zero development in line with CLIM2, CLIM3, CLIM4 and CLIM5 and BEE-011 would be capable of delivering a highly sustainable, energy efficient scheme that accords with the requirements of this policy.
- 4.3 Overall, the Draft Plan should consider each proposal on a case-by-case basis, to ensure that the viability of any development scheme and particular allocation is not prevented due to undeliverable requirements. To achieve net zero housing, will take a period of time through the design and construction methods that also create additional build costs that could impact the viability and deliverability of sites.
- 4.4 BEE-011 would support an east-west development layout, which would support passive design principles and the installation of solar panels to help tackle the climate emergency.

#### 5. CREATING DESIRABLE PLACES

- 5.1 Falcon supports Policy DES1 and the aspirations within Policy DES1.1 to achieve the sub policies (a – h) ensuring that all new development is cohesive with the surrounding character of the areas and creating communities where people aspire to live.
- 5.2 The location of BEE-011 would also ensure an allocation would accord with sub-paragraph (g) and allowing residents to “live locally” and access services and facilities through walking/cycling with the entrance to the site being situated on Basingstoke Road that has direct footpaths into both the centre and southwest areas of Alton Town, as identified in the Accessibility Study Appendix D.
- 5.3 Policy’s DES2 and DES3 are supported to ensure that any forthcoming allocation is integrated within the existing character and surrounding of the locality. BEE-011 would provide a more cohesive and comprehensive development with the allocation at ALT4 and this is clearly evidenced in [Appendix 3](#). An allocation at this location would accord with Policy DES2 and DES3 ensuring the proposed scheme can accommodate additional housing and respect the existing local character of the *Beech/Alton non coalescence area*, by providing a defensible boundary against further development towards Beech and rounding off the settlement boundary of Alton Town.

5.4 Falcon also support Policy DES4 Design Codes. The Draft Plan should identify the conditions for each settlement size and housing allocation to ensure there is a consistent understanding of the requirements set out within each local area.

## 6. HOMES FOR ALL

6.1 Falcon supports EHDC proposal to deliver 3,500 new homes including a 10-15% buffer to allow for flexibility, on the basis that some housing allocations may not be delivered due to potential unforeseen issues within the plan period. Policy H1 is also supported when identifying approximate numbers of homes to be distributed across the various Tiers of settlement.

6.2 In line with paragraph 3.2 of this Representation, it is encouraged that EHDC undertake further means testing to ensure that the overall housing figure within the Plan is robust and in accordance with NPPF paragraph 60.

6.3 Policy H2 is supported to ensure a range of house types, tenures and sizes are provided and meet local needs. Flexibility should be afforded within the policy to allow for the character of the surrounding areas in line with Creating Desirable Places section. Further consideration needs to be given over the deliverability of all private dwellings to meet M4 (2) standards, especially when considering the delivery of apartment blocks or maisonettes.

6.4 Policy H3 is supported, subject to further means testing and robustness of viability for a 40% threshold for all applications above 10 dwellings, rather than an increase in overall housing numbers to be delivered within the Draft Plan.

6.5 An allocation at BEE-011 would support the Homes for All section due to its deliverability and lack of onsite planning policy constraints.

- H1 – housing identified within the confines of Alton as aa Tier 1 settlement.
- Policy H2 – the ability for the location and design of scheme to deliver a range of house types, tenures and sizes.
- Policy H3 – the delivery of 40% affordable housing due to being an unconstrained site and would not require any viability assessment.

## 7. SITE ALLOCATIONS

7.1 The Draft Plan proposes 42 sites for allocation that are set out in broad accordance with the Spatial Strategy Policy S1 and Settlement Hierarchy of S2.

### Alton

7.2 Alton as the only Tier 1 settlement within EHDC and is proposed to take 1,700 homes within the Draft Plan

- Approx. 1,000 homes proposed in the strategic site at ALT8.
- 264 homes allocated at ALT1, ALTF and ALT5.
- Remaining homes to be identified through Alton Neighbourhood Plan

7.3 When considering the strategic policy constraints of Alton, with the exception of the strategic site at ALT8 growth is limited to the west of Alton as per *Figure 12.2: Strategic Environmental Constraints for all New Development in and around Alton* due to the following constraints.

- North – topography and landscape views.
- East – the settlement of Holybourne village.
- South – lack of highways and infrastructure to serve further development.

7.4 The Accessibility Study focuses on development within the *20-minute neighbourhood principles* and concludes that it should be applied to East Hampshire to ‘help maximise the potential for Living Locally as this meets EHDC’s Corporate Strategy and aspirations’.

7.5 The Accessibility Study considers BEE-011 as one of the sites under ref LAA/BEE011 and should be read in conjunction with LAA/BEE-010 (ALT4). The site boundary of BEE-011 sits just beyond the 15-minute walking isochrone, but well within the 10-minute isochrone and given Alton as a Tier 1 settlement would reflect its sustainable location on the edge of the settlement.

7.6 In line with the Spatial Strategy of the Draft Plan, sustainable locations such as BEE-011 in Tier 1-3 settlements should be the focus of development.

*Proposed New Sites in Alton & Land at Wyards Farm – BEE-011*

7.7 The Draft Plan identifies four new sites for residential housing allocations in *Fig 12.4 Location of Outstanding Housing Permissions and Proposed Sites in Alton and Holybourne*.

- |  |                             |
|--|-----------------------------|
| • ALT1 – Land at Brick Kiln Lane, Alton                | 150 homes.                  |
| • ALT4 – Land at Whitedown Lane, Alton                 | 90 homes.                   |
| • ALT5 – Land at Travis Perkins (Mounthers Lodge part) | 24 homes.                   |
| • ALT8 – Land at Neatham Manor Farm, Alton             | <i>at least</i> 1000 homes. |

7.8 The Alton Neighbourhood Plan is in the process of being revised and is expected to allocate the outstanding housing numbers (436 homes) to ensure that 1,700 homes are delivered within the Draft Plan around Alton. Alongside the uncertainty of the strategic site at ALT8 being unable to deliver at least 1,000 homes, the opportunity exists for the Draft Plan to deliver greater certainty for the Alton area to allocate a further housing scheme at BEE-011. This will be discussed further within the section.

7.9 The land at BEE-011 is identified as being suitable for 80 dwellings following a review of the site’s opportunities, constraints and relationship to ALT4 and the wider surroundings, including ALT1.

The Site totals 7.7 hectares in size with the northern section fronting A339/Basingstoke Road delivering a net developable area of approx. 4 hectares at a density of 20dph. The density would reflect the edge of settlement location and transition into the countryside.

A 15m landscape buffer is proposed on the western boundary to link the existing woodland copse on the western boundary along the A339/Basingstoke Road to the area of ancient woodland on the east within ALT4. This would provide an opportunity to create a biodiversity/ecological corridor, as well as a boundary edge to Alton settlement. The proposed landscaping and tree planting would provide a strong and defensible boundary edge to Alton settlement and prevent further sprawl into Beech Parish, protecting the Beech/Alton non coalescence gap.

The remaining 3.7 hectares of land to the south of the site would be suitable for the creation of areas of biodiversity net gain, through the creation of orchards and wildflower meadows to transition into the wider countryside setting, as well as a LAP or LEAP for the benefit for BEE-011 and ALT4. The area could also accommodate allotments for those within both Beech and Alton parishes.

The promotion plan is in [Appendix 1](#) and the proposed layout for 80 dwellings at [Appendix 2](#).

- 7.10 The Draft Plan has focused development within Alton to the strategic site at ALT8 on the east of the settlement and the new sites ALT1 and ALT4 to the west of Alton town.
- 7.11 The site at BEE-011 is sustainably located, with direct access onto the A339 Basingstoke Road that has footpaths/cycleways directly into the town and is lit by streetlamps, demonstrating that the area sits within an urban setting and built-up area of Alton. The location would therefore provide a logical and sustainable extension for residential development to accommodate the housing requirement within Alton. Allocation of BEE-011 in addition to ALT4 would have no further detrimental impact to Beech village, whilst providing additional CIL revenue to Beech Parish due to the adoption of BNDP.
- 7.12 BEE-011 has a close relationship to ALT4 and can be interlinked to the site, with a greater relationship to the Alton built-up area when considering ALT4 than Beech village. When the two sites are considered as a whole, as evidenced in [Appendix 3](#), the site's proposal delivers a more comprehensive and cohesive development that would provide a more natural '*edge of settlement*' to Alton than would be secured by the sole allocation of ALT4.
- 7.13 With the Draft Plan focusing development on the western edge of Alton, when taking a wider contextual view to include ALT1, ALT4 and the Crest Nicholson development to the south at Ackender Hill, the inclusion of BEE-011 as an allocation would deliver a more complete community for this area of Alton. In addition to sitting better within the wider landscape, additional housing at BEE-011 could also contribute to improving the surrounding infrastructure and highways alongside allocations at ALT1 and ALT4. This can be viewed at [Appendix 4](#).

7.14 BNDP has identified an *Alton/Beech non coalescence area* that includes the ALT4 and BEE-011. Falcon are supportive of maintaining a gap between the settlements with BEE-011 providing a more natural and defensible boundary due to the existing landscape and screening on the western boundary, whereas ALT4 remains very open and integral with the surrounding landscape of BEE-011. In accordance with Policy BPC03 of BNDP a proposed revision to the *Alton/Beech non coalescence area* can be found at [Appendix 5](#), which Falcon would support for inclusion in the Draft Plan.

7.15 ALT1 – Land at Brick Kiln Lane, Alton is proposed for 150 dwellings and when considered in line with [Appendix 5](#) it would assist in creating a defensible boundary edge to Alton settlement alongside the inclusion of BEE-011 for housing. Tree belts on the western edge of the site, alongside the natural wooded area to the west of BEE-011 would create a natural buffer to any further development to the west, aligning with NBE11 of the Draft Plan and Policy BPC03 on BNDP.

On the above basis Falcon support the allocation at ALT1 subject to an additional allocation at BEE-011 to deliver a more comprehensive development proposal to the west of Alton.

7.16 ALT4 – Land at Whitedown Lane, Alton is proposed for 90 dwellings and is considered to relate to the built-up area of Alton, rather than Beech village/Parish. Due to the separation of the site by the A339, woodland and topography, the site in isolation would appear to have a poor relationship with Alton settlement. However, when considering the site in conjunction with an additional allocation at BEE-011, as evidenced in [Appendix 3](#) the development proposal is a logical extension to Alton settlement in accordance with ALT1 and can be justified in [Appendix 4](#) when considering the wider context.

The Beech/Alton non-coalescence area is a consideration of ALT1 and when combined with BEE-011 and ALT1 it would clearly define the edge of Alton settlement and ensure that a defensible area of non-coalescence between settlements can be retained.

On the above basis, Falcon support the proposed allocation at ALT4, subject to the inclusion of an additional allocation at BEE-011 to deliver a more strategically planned development for the area south of A339/Basingstoke Road.

7.17 ALT5 – Land at Travis Perkins (Mounters Lodge part) is allocated for 24 dwellings and as a brownfield site on the centre of Alton this allocation is supported by Falcon.

7.18 ALT8 – Land at Neatham Manor Farm, Alton is a new strategic allocation being proposed by EHDC in the Draft Plan. Previous versions of the Draft Plan have included alternative sites in Bentley and Chawton Park Farm, with both proposals being removed from consideration due to a lack of supportive evidence base, technical issues and deliverability. The proposal would need to be fully tested to ensure that the ambition of approx. 1000 homes and associated infrastructure, amenities etc. is both achievable and deliverable. Due to ALT8 only recently having been proposed by EHDC, it is unlikely that a robust enough design framework, technical reports and infrastructure requirements can guarantee the delivery of all the proposed homes. This leaves the Draft Plan open to further scrutiny and risk of being found ‘unsound’.



Where there are other opportunities within the Alton vicinity, or surrounding Parishes (given ALT8 is located in Binsted Parish) that are unconstrained and can immediately deliver housing, such as BEE-011, these sites should be allocated in addition to ALT8. Smaller allocations, such as BEE-011 would also deliver housing at a quicker rate, maintaining EHDC land supply and meeting local housing needs, as larger strategic sites of this nature will take longer to come forward and deliver homes.

Falcon would therefore encourage EHDC as part of the Draft Plan to allocate further new sites within the Alton vicinity, to safeguard against any delays in the delivery of ALT8, subject to the necessary technical due diligence.

BEE-011 would represent an available, achievable and deliverable site.

## 8. CONCLUSION

- 8.1 The Representations have been prepared by Falcon in relation to BEE-011 to respond to the policies of the Draft Plan, where appropriate and support an allocation of 80 dwellings within Alton (and the surrounds) as a Tier 1 settlement for the next stage of the Draft Plan.
- 8.2 The Spatial Strategy aims to focus the core of development in line Tiers 1-3 of the Settlement Hierarchy that also accord with the *20-minute neighbourhood principles* within the Accessibility Study. The predominant focus for development is within Alton, as the only Tier 1 Settlement and BEE-011 located directly adjacent to ALT4.
- 8.3 Although located within Beech Parish, the site at BEE-011 would share the same characteristics as ALT4 as part of the setting of the built-up area of Alton, with additional plans in Appendix 3, Appendix 4 and Appendix 5 supplied to update the Evidence Base that supported the selection of housing allocations within Alton and the surrounding area.
- 8.4 The proposed site at BEE-011 is proven to be a sustainable and suitable location for residential housing allocation that would deliver a more comprehensive development proposal alongside ALT4. The site would provide a natural and defensible edge to the west of Alton, whilst maintaining a logical *Beech/Alton non-coalescence area* to align with the BNDP, as well as accommodating an east-west layout for development, which would support passive design principles to help tackle the climate emergency.
- 8.5 The addition of BEE-011 as an allocation alongside ALT1 & ALT4 would support the Draft Plan in strategically planning the provision of additional homes to the west of Alton, as a Tier 1 settlement. When considered in the wider context, this would deliver a highly sustainable extension to address local housing need.
- 8.6 BEE-011 would deliver additional funding to Beech Parish through the provision of CIL funding due to the adoption to BNDP, with a negligible impact to the village of Beech.
- 8.7 Falcon are committed to working closely with EHDC and Officers to secure an allocation at BEE-011 in the next stage of the Draft Plan.



NO.	DESCRIPTION	AREA	PERCENTAGE
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Wyndham Farm





Project:  
**LAND AT BASINGSTOKE ROAD  
ALTON**

Phase:  
PROPOSED SITE LAYOUTS  
COMBINED CONTEXT SITE LAYOUTS (COLOURED)

Reference:  
24.1887.001

Client: **finc**

Prepared by: **finc**

Scale: 1:500

Date: 24.10.2024

Author: **finc**

Check: **finc**

Drawn: **finc**

Reviewed: **finc**

Approved: **finc**

Project Manager: **finc**

Site Location: **finc**

Site Name: **finc**

Site Reference: **finc**

Site Area: **finc**

Site Status: **finc**

Site Notes: **finc**



Scale: 1:500

Project:  
**LAND AT BASINGSTOKE ROAD  
ALTON**

Client:  
[Redacted]

Date:  
24.10.2022

Drawn: [Redacted] / [Redacted]

Checked: [Redacted] / [Redacted]

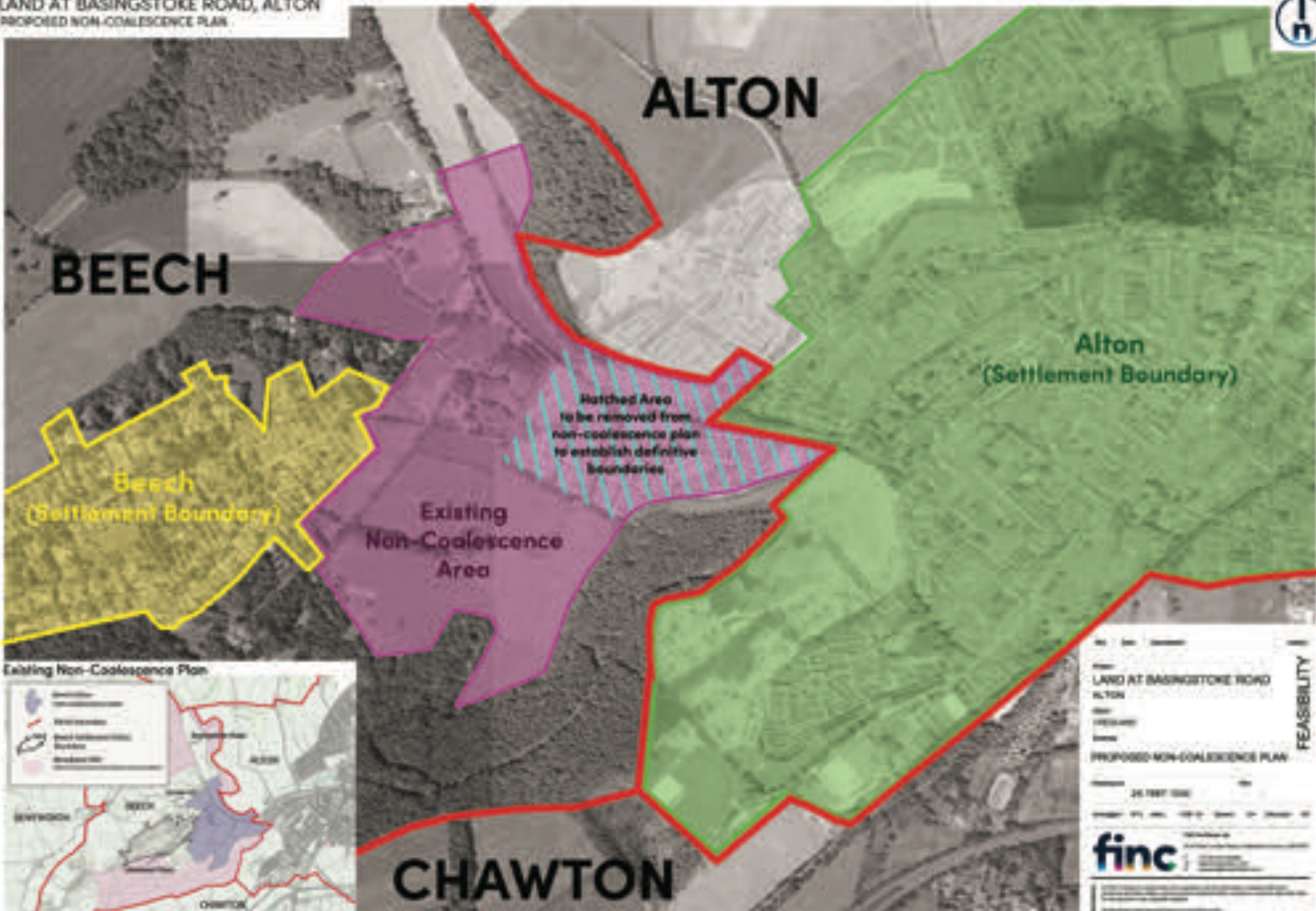
Approved: [Redacted]

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**ALTON**

**BEECH**

Alton  
(Settlement Boundary)

Beech  
(Settlement Boundary)

Existing  
Non-Coalescence  
Area

Hatched Area  
to be removed from  
non-coalescence plan  
to establish definitive  
boundaries

**CHAWTON**



Scale: 1:10,000

Project: LAND AT BASINGSTOKE ROAD, ALTON

Phase: FEASIBILITY

Proposed Non-Coalescence Plan

Date: 24.08.2015

Author: [Name]

Check: [Name]

Draw: [Name]

Scale: 1:10,000

North Arrow



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

March 2024

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2.0 Land at Borovere Farm

3.0 Draft Local Plan Policies

4.0 Conclusion

Appendix 1: Site Location Plan

Appendix 2: Minutes from Alton Neighbourhood Plan Steering Group Meeting



## **1.0 Introduction**

1.1 Foreman Homes welcome the opportunity to comment on East Hampshire District Council's Regulation 18 consultation on the Draft Local Plan 2021-2040. These representations are made in the context of our land interest at Borovere Farm, shown in Appendix 1. The land at Borovere Farm is available and suitable to meet the objectives of sustainable development.

## **2.0 Land at Borovere Farm**

2.1 The site is located on the southern edge of Alton, to the east of the permitted Foreman Homes and Vivid development at Selbourne Road which is currently under construction (30021/056). The site comprises approximately 30.87 hectares, and is currently in arable use with boundaries largely defined by trees and hedgerows. The north western section of the site comprises previously developed land where Borovere Farm is currently situated. It is proposed that a highly sustainable development could be accommodated on the site.

2.2 As a strategic opportunity for growth, the land South of Alton could come forward as a logical sustainable urban extension to the existing settlement, primarily for housing development together with a primary school and local facilities. It is estimated that the land has the capacity to accommodate circa 750 dwellings of various types, sizes and tenures with a sensitively designed landscape led scheme that recognises the need to protect views to and from both Windmill Hill and the South Downs National Park (SDNP).

2.3 The site is sustainably located with access arrangements already in place. Access could be achieved through the permitted Foreman Homes and Vivid scheme at Selbourne Road that is under construction. The site is approximately a 12-minute walk to the nearest supermarkets, a 20-minute walk to the train station, a 15-minute walk to the nearest school and a 20-minute walk to the town centre.

2.4 This is also an opportunity to bring forward sustainable development earlier in the plan period than other strategic opportunities due to this site being developer led with no requirement to bring a delivery partner onboard at a later date.

2.5 Alternatively, the northern part of the site which includes the brownfield component could be brought forward to form a sustainable urban extension to Alton and link to the permitted schemes at Selbourne Road as shown in Figure 1 below.



**Figure 1: Proposed Smaller Scheme**

2.6 Policy S1 (Spatial Strategy) states that:

*“To achieve sustainable growth the Local Planning Authority will ensure development is distributed in accordance with the spatial strategy shown on the Key Diagram, in line with the settlement hierarchy (Policy S2), with a greater proportion of development in the larger and more sustainable settlements”*

2.7 In the revised settlement hierarchy of the Draft Local Plan, Alton (and Holybourne) is the only Tier 1 settlement within the Local Plan area. Policy H1: Housing Strategy identifies a broad distribution of new housing that follows the settlement hierarchy by distributing more new homes to the higher tiers of the hierarchy as these settlements have an extensive range of accessible facilities and services for meeting the everyday needs of local residents.

2.8 EHDC’s Land Availability Assessment (November 2023) was produced to consider sites that have been put forward for development and provide an assessment of the potential of those sites for development. Land at Borovere Farm was included as part of a larger a parcel of land assessed under site reference LAA/AL-056, and assessed as being developable. The assessment is shown in Figure 2 below.



Figure 2: EHDC LAA

### 3.0 Draft Local Plan Policies

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

- 3.1 Policy NBE1 states proposals for development in the countryside, which is defined as land outside settlement policy boundaries, will only be supported in a narrow set of circumstances. This does not allow for sufficient flexibility to respond to changes of circumstance such as a shortfall in housing supply. Foreman Homes consider that there should be a criteria-based policy which will provide a more appropriate mechanism for assessing the merits of individual developments proposed, based on their specific circumstances and ability to deliver sustainable development. A criteria-based approach would allow the LPA to protect itself against unsustainable development whilst providing flexibility to allow for sustainable developments to come forward on the edge of the higher tier settlements in accordance with the Settlement Hierarchy.

- 3.2 Harborough District Council’s Local Plan has such a policy and is shown below in Figure 3. Whilst this is not a local example, it still operates under the same regime and is relevant.



**Figure 3: Extract from Harborough Local Plan 2011-2031**

- 3.3 This is an example of a local authority taking a proactive approach to guiding development and ensuring that it can meet its housing requirement as well as allowing for flexibility should sites allocated in the plan not come forward as anticipated. A similar approach could be taken in East Hampshire with the policy worded to reflect local circumstances.
- 3.4 A flexible approach such as this, is even more important in light of the changes to the NPPF published in December 2023. Paragraph 76 states that local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing where their adopted plan is less than five years old and that plan identified a five-year supply at the time of examination. Consequently, upon adoption of the plan, if sites do not deliver as anticipated and delivery rates drop, there will be no trigger to engage Paragraph 11, the presumption in favour of sustainable development. Without this there needs to be an appropriate mechanism in place whereby additional sustainable sites can come forward to continue to meet housing needs in the area.

## Policy H1 Housing Strategy

- 3.5 As defined by the Spatial Strategy (Policy S1) there is a need to plan for a total of 9,082 dwellings over the Plan Period 2021 to 2040, or 478 dwellings per annum. However, a large proportion will be met through existing commitments. 940 homes have been completed between 2021 and 2023, 3,965 are expected to come forward through existing planning permissions, and an allowance for windfall sites has been included in the identified supply which leaves 2,857 additional homes to provide for through the Local Plan. Policy H1 makes provision for at least 3,500 net additional dwellings across the district during the plan period, 643 homes over the minimum requirement.
- 3.6 The identified housing supply relies on 3,965 dwellings coming from existing planning permissions which assumes a 100% delivery rate. However, there is no evidence that all these permissions will progress to completions at the point envisaged. There is likely to be a proportion of permissions that will lapse. Recently sharp increases in build costs and a drop in house prices nationally partially fuelled by increases in interest rates have placed viability pressures on some consented schemes. Therefore, further allocations should be considered to ensure that the planned quantum of development will be met over the plan period and provide flexibility in the supply.
- 3.7 Foreman Homes support the inclusion of an allowance for unmet need from the South Downs National Park but consider that more should be done to address wider unmet need. As detailed in the Partnership for South Hampshire (PfSH) Spatial Position Statement (December 2023) there is an unmet need across the sub-region of approximately 12,000 homes to 2036. Whilst Broad Areas of Search for Growth have been identified and will subsequently need to be considered in local plans, this is a long-term solution. There are suitable, available and achievable sites in East Hampshire and therefore EHDC should be contributing further to the growing housing shortfall and wider unmet need across the South Hampshire region.
- 3.8 Paragraph 9.13 of the Draft Local Plan makes reference to unmet need and states that “any dwellings surplus to the identified requirements in these Local Plan could go some way to potentially address those unmet needs”. However, having a contingency buffer within the supply is necessary to ensure that the Plan is sufficiently flexible to accommodate needs not

anticipated in the Plan and to provide a contingency should delivery on some sites not match expectations. Considering this a potential contribution to unmet need is not justified as it would be double counting. Furthermore, the 643 additional homes over and above the identified minimum requirement is equivalent to 7% of the overall plan requirement. It is clear that a much larger buffer between the identified housing need and actual supply is needed to make sure the Plan is flexible and robust enough to deliver the required amount of housing.

3.9 The plan makes provision for 700 homes to come forward in Alton through the Alton Neighbourhood Plan which is in the process of being updated. However, the minutes of the Alton Neighbourhood Plan Steering Group from the 21<sup>st</sup> February 2024 confirm that the Neighbourhood Plan will be progressed without allocations for housing development. Therefore, it is necessary for the Draft Local Plan to allocate further sites in Alton to ensure that this component of the housing requirement for East Hampshire is planned for appropriately.

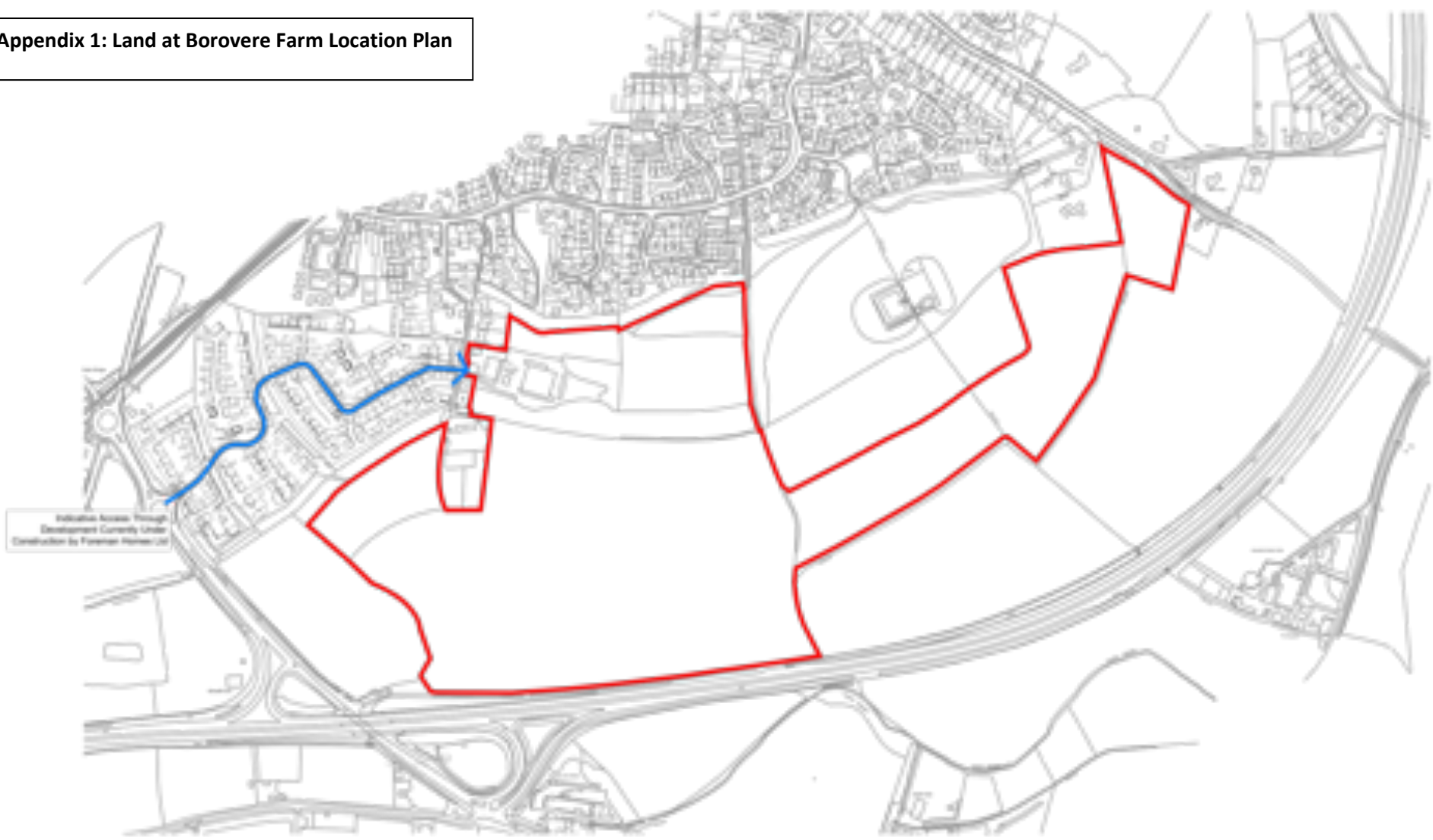
#### **4.0 Conclusion**

4.1 The housing strategy of the Draft Local Plan does not meet the tests of soundness set out in Paragraph 35 of the NPPF.

- It is not positively prepared as it fails to take account of unmet need from neighbouring areas even though there are suitable sites that would make it practical to do so and consistent with achieving sustainable development.
- It is not justified as the reliance on the Alton Neighbourhood Plan to bring forward 700 homes is not an appropriate strategy given that the Neighbourhood Forum have stated that they will not be including housing allocations in their plan. Further housing allocations in Alton are now necessary.
- It is not effective, particularly due to EHDC's reliance on large scale strategic sites to supply much of its housing requirement. A larger contingency buffer is necessary in order to ensure that the plan meets objectively assessed development requirements and is consistent with the NPPF.

- 4.2 The PPG makes clear that the standard method is a minimum and given that there are suitable, available and achievable sites in the district, including the land at Borovere Farm, EHDC should be allocating further sites to meet demand in the area.
- 4.3 Furthermore, Borovere Farm in particular is well located to bring forward sustainable development earlier in the plan period than other strategic opportunities due to this site being developer led with no requirement to bring a delivery partner onboard at a later date. Access is readily achievable through the approved Foreman Homes and Vivid scheme at Selborne Road and so development in this location is not reliant on lengthy additional offsite highways works. The site is deliverable in the short to medium term and should be allocated in the Local Plan, particularly in the absence of allocations coming forward in the Alton Neighbourhood Plan.

Appendix 1: Land at Borovere Farm Location Plan



Indication Access Through Development Currently Under Construction by Foreman Homes Ltd



**Notes**

The drawings shall only be used for planning purposes. Consents for the development shall not be issued until all relevant planning and other consents have been obtained.

Topographic information shown has been prepared by a qualified surveyor. HGP accepts no responsibility for accuracy or completeness of the same.

The drawings are for use in conjunction with all other project drawings, specifications and schedules. All dimensions shall be as shown unless otherwise stated.

Design subject to client development approval. Measurements and specifications are subject to change without notice. All dimensions shall be as shown unless otherwise stated.

**Location Plan**

PROJECT	JOB NO.
Borovere Farm, Ayles	24-001
SCALE	DATE
1:5000	Feb 24
DRAWN BY	CHECKED BY
SP	A
DATE	STATUS
24	Preliminary



Hatch Group Plc  
 Borovere Farm, Wickham Road  
 Haslemere, Hampshire GU27 2LJ

01256 331100  
 enquiries@hatchgroup.co.uk  
 hgp.co.uk



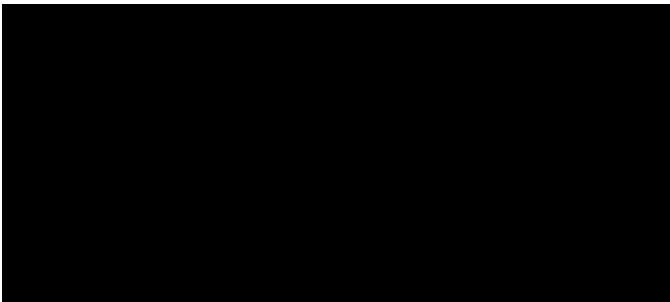


**ALTON NEIGHBOURHOOD PLAN STEERING GROUP  
MEETING NOTES  
WEDNESDAY 21st FEBRUARY 2024**

**In attendance:**

Mike Heelis – Chair (MH)

David Allan – Vice Chair (DA)



Councillor Suzie Burns – EHDC Representative (SB)

Councillor Graham Hill - ATC Representative (GH)

Pat Harris – Interim Town Clerk (PMH)

Adam Harvey – EHDC Officer (AH)

Jenny Wood – EHDC Officer (JW)

1. **Apologies** – No apologies as all members present

**Ex-officio** - Councillor Annette Eyre & Councillor John Chubb

**Not required:** 

2. **Updates since Last Meeting**

- 2.1 MH welcomed both Adam & Jenny to the meeting

- 2.2 RF advising that he was meeting with LC in the morning to go through the amenity land mapping and that this would be circulated once completed. RF apologized that this had not happened as yet.

- 2.3 Steering Group actions in taking photographs of buildings in the Local List – only 4 photographs received from the list that was circulated. Those who had indicated they would assist with the taking of photographs assured the group that these would be forthcoming as soon as there was a “break” in the weather in order to achieve good quality photographs for inclusion in the Plan. AH enquired whether the Conservation Officer had been consulted on the Local List and requested that once completed that details were provided to the Conservation Officer. PH advised that the Conservation Officer had been consulted and were aware of the Listing.

- 2.4 The Chair of the Holybourne Village Association had sent in a FOI request to the Town which had been satisfied with the publication of all of the meeting notes of the Steering Group, which had been redacted as appropriate. The Steering Groups Terms of Reference were already published on the Town Council's website, but this was also provided to avoid any confusion as to the terms under which the SG operates.
- 2.5 Ashdell Road Residents Association had approached MH for clarification on a number of matters relating to misinformation on some websites which had been satisfied
- 2.6 The Chair of the Holybourne Village Association had issued a letter to advise that it was joining the Windmill Hill pressure group – which was acknowledged
- 2.7 Original Scenario Planning document is the current document being applied pending an outcome decision today (see item 4 site allocations)
- 2.8 JB had worked on a Press Release but it had been agreed that nothing would be released until after the meeting taking place today.

### 3. Review of Housing Allocation Approach

- 3.1 MH acknowledged that there were 4 pressure groups namely Chawton Park Farm; Windmill Hill, Holybourne & Neatham Down and that as a result of his presentation to District Councillors in January that concerns mounted over the allocation approach being followed by the SG which the consultants had worked up namely the 4 scenarios:
  - Scenario 1 Brownfield sites
  - Scenario 2 Will Hall Two; Pertuis Avenue & Travis Perkins
  - Scenario 3 Holybourne
  - Scenario 4 Windmill Hill & fields (South Alton)

In November 2023, ANLSG were given by District a target allocation of 700 with the District Local Plan allocating a strategic site for 1,000 which made up the total of 1700 allocated to Alton.

### 4. Site Allocations

- 4.1 The Steering Group, following lengthy discussion and input from all attendees were requested to determine which of the 3 options as advised by District they wished to take forward.

**Option A:** As is evident by a number of ‘made’ Neighbourhood Plans in East Hampshire, the plan does not need to include site allocations. All relevant applications are still determined by the policies within the neighbourhood plan and the increased CIL contributions (if applicable) still apply. The main significant difference is paragraph 14 in the NPPF (December 2023) would not apply. As a result, in situations whereby the LPA cannot demonstrate a sufficient supply of housing, the tilted balance is engaged and the presumption in favour of sustainable development would apply. However, Alton is currently in a favourable position, as the updated NPPF has extended the protection afforded by paragraph 14 to five years (from the Neighbourhood Plan being ‘made’) from the previous two, meaning the paragraph 14 applies until November 2026. Similarly, changes to the NPPF now mean the LPA are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing for decision making purposes if the following criteria are met:

- their adopted plan is less than five years old; and
- that adopted plan identified at least a five-year supply of specific, deliverable sites at the time that its examination concluded.

Therefore, following adoption of the Local plan, for a five-year period the tilted balance would not be engaged.

**Option B:** As determined by the Draft Local Plan, a housing requirement of 700 dwellings as well as a strategic allocation of about 1,000 has been proposed in and around Alton. As detailed in previous correspondence, growth of a strategic nature, such as Neatham Manor Farm, should be addressed by the Local Plan process. However, the 700 dwelling figure could be met via the Neighbourhood Plan. Three sites have been included in the Draft Local Plan, where they fall outside (or partly outside) the designated Neighbourhood plan area. We welcome your comments on those sites as part of the current consultation.

**Option C:** The final option would be to allocate some sites in the Neighbourhood Plan. We would need to work together to determine how the 700 dwelling figures is addressed by both plans, but similar to the 2021 Modification, the Neighbourhood Plan could concentrate on those sites within the settlement policy boundary. The scenario planning in September identified up to 600 dwellings that could be delivered from existing sites in the SPB. Whilst EHDC raised concerns on the deliverability of some of those sites, it would be useful if more detailed work was done as part of the neighbourhood plan to fully realise those sites that could be developed in such locations, making the best use of existing brownfield opportunities in the SPB. This approach would result in paragraph 14 being engaged.

By a majority decision, the ANPSG voted for Option A: Do not allocate sites and therefore the ANP3 would go forward without site allocations.

## 5. Confirmation of Policies

- 5.1 This work on updating and refining of the Policies continues and (LC) will carry on with producing the Draft NP plan in readiness for the Reg 14 Consultation scheduled for 26th/27th April
- 5.2 AW & JW requested that once updated, a copy to be forwarded to them which was agreed

## 6. Update on Public Engagement/Communication

- 6.1 Approximately 200 residents attended the Local Plan engagement session at The Maltings
- 6.2 JB would work up a Press Release to be circulated to the group Monday, 26<sup>th</sup> but will await publication of the Agenda for the Extra-ordinary Meeting of the Alton Full Council due Thursday/Friday of this week.

## 7. Next steps in the Project Plan

- 7.1 An updated Project Plan will be drawn up given the decisions of the meeting today
- 7.2 The Alton Neighbourhood Plan Reg 14 consultation will take place on Friday, 26<sup>th</sup> & Saturday 27<sup>th</sup> April – the location to be confirmed but hopefully the Assembly Rooms.

## 8. Any Other Business

- 8.1 There was none

## 9. Next Meeting

The next meeting will be on **Wednesday, 13<sup>th</sup> March at 2.00 p.m.**

**From:** [REDACTED]  
**Sent:** 08 March 2024 16:02  
**To:** [EHDC - Local Plan](#)  
**Subject:** Gillings Planning obo Cavendish and Gloucester Limited - Local Plan Representation  
**Attachments:** [TheDellMedsteadLocalPlanRepsMarch2024.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 Sir / Madam

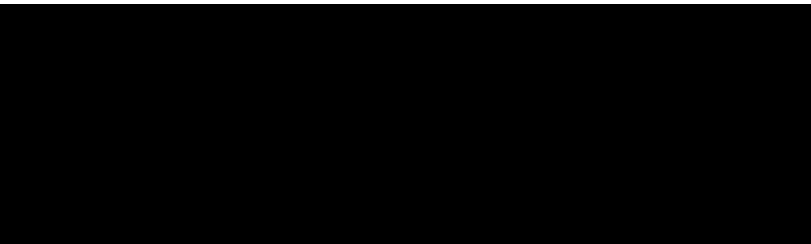
### Response to the East Hampshire District Council Local Plan 2021-2040 Regulation 18 Consultation

I act on behalf of our client, Cavendish and Gloucester Limited, who have an ongoing interest in land, the existing dwelling and its associated outbuildings at The Dell, Homestead Lane, Medstead as shown edged in red on the aerial photograph in the attached letter.

The attached letter provides our formal representations to the local plan consultation.

I look forward to discussing these representations with you in due course.

Yours faithfully



This e-mail is intended for the above named only, is strictly confidential and may also be legally privileged. If you are not the intended recipient please do not read, print, re-transmit, store or act in reliance on it or any attachments. Instead, please notify the sender and then immediately and permanently delete it. Gillings Planning Ltd, registered in England and Wales. Registered No 10778690. Registered Office Gillings Planning, 2 Wessex Business Park, Colden Common, Winchester, Hampshire, SO21 1WP.

8<sup>th</sup> March 2024

REF: CAVE1001

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

Sent by email: localplan@easthants.gov.uk

Dear Sir / Madam

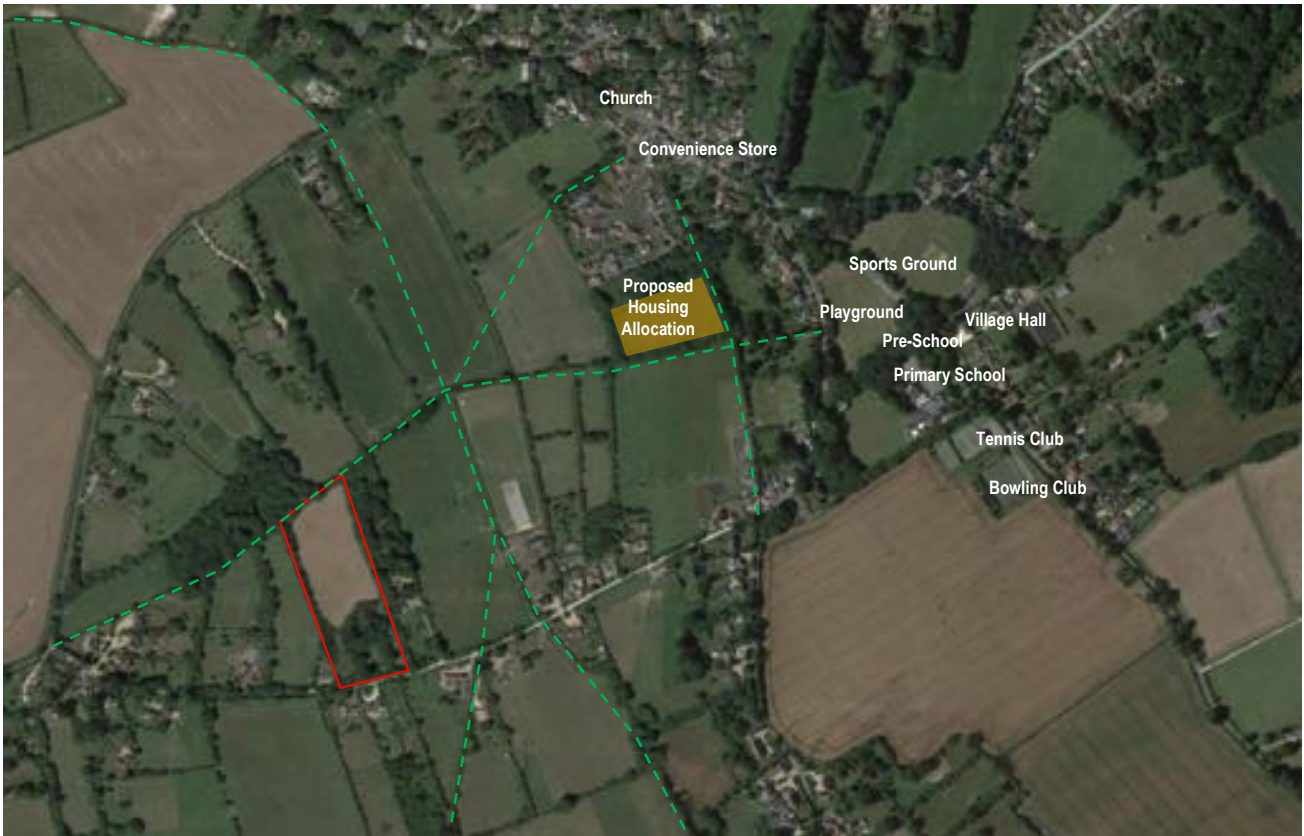
**Response to the East Hampshire District Council Local Plan 2021-2040 Regulation 18 Consultation**

I act on behalf of our client, Cavendish and Gloucester Limited, who have an ongoing interest in land, the existing dwelling and its associated outbuildings at The Dell, Homestead Lane, Medstead as shown edged in red on the aerial photograph extract below.



These comments are made in response to the East Hampshire District Council (EHDC) Local Plan 2021-2040 Regulation 18 (January 2024) consultation version made under Regulation 18 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012.

This letter provides formal comments and I trust that these representations duly made within the determined timescales, will be formally accepted and considered by EHDC as the local plan progresses to the next stage. I understand that this representation will be published in the public domain with the name of our client, and we give consent.



Aerial photo showing The Dell and it's relationship to key amenities 600 to 700 metres to the north-east and footpath network

### Background to the site and planning history

By way of background, our client owns The Dell and we consider that it is under utilised and can accommodate new homes, open space and a new public right of way connection that can encourage walking from other houses along the lane and enhance the overall sustainability of the village by bringing investment and future expenditure to the village.

The site was the subject of the grant of planning permission subject to conditions for a much larger replacement dwelling. It is important to note, at that time, the Local Planning Authority accepted that the existing dwelling on the site is past its optimum lifespan and is in need of replacement.

If the site were a blank canvass today; no one would agree that a single house on such a large plot is a good use of land. In our view, this site can, and should be put to a more effective use. Land is a scarce resource, and we all have a duty to ensure it is used wisely.

### Comments on Relevant Policies

#### Policy S1 – Spatial Strategy

Policy S1 sets out the need to deliver 9,802 new homes. Disappointingly, the Council only seeks to address this minimum identified need. There is no attempt to be proactive and deliver more; which would increase the supply, reduce demand and help to prevent the costs of new homes from spiralling ever more into the threshold of unaffordability.

As set out within the Housing Background Paper, the Partnership for South Hampshire (PfSH) Spatial Position Statement (December 2023) details that there is an unmet need across the sub-region of approximately 12,000 homes now (right now) in the period up to 2036 – this is above and beyond those already being built or already allocated. The Background Paper acknowledges that in the short to medium

term the LPA should be able to meet its own housing needs; but it misses the point, and does not seek to fully help the PFSH area meet this unmet need.

The background paper acknowledges that any dwellings surplus to the identified requirements could be attributed to any future identified unmet need, particularly in the South Hampshire region. This is not positive, nor sound; and does not show good cooperation, so is arguably not legally compliant.

Of the 9,802 which are to be provided, the background paper indicates that considering those homes which have already been built or are committed through planning permission granted since 2021, there is a residual requirement of 2,857 homes. Factoring in an allowance of flexibility for those sites which do not come forward, the Local Plan identifies a need for 3,500 homes.

#### Policy S2 – Settlement Hierarchy

Policy S2 places Medstead within Tier 4 of the identified hierarchy of settlements and indicates that development outside of settlements will be restricted to that which is appropriate in a rural area as set out in policy NBE1 (which is addressed separately below). The policy acknowledges that development will be delivered through existing commitments, site allocations and through windfall development in accordance with other plans.

As discussed in Chapter 12 of the local plan, the site is within the North Area: Remaining Settlements & Site Proposals. Policies in Chapter 12 set out allocations for this area and only include one small site in Medstead. Put simply, Medstead can and should do more to help the District deliver its housing needs and bolster its own sustainability.

In our view, the local plan is too reliant on larger sites, and is focussing too many homes around Alton on sites that are physically disconnected from local amenities and are no more sustainable than Medstead.

#### Policy NBE1 – Development in the Countryside

In our view Policy NBE1 is too restrictive in the types of development it allows for within the countryside and needs greater flexibility if it is to accord with the NPPF.

#### Policy H1 – Housing Strategy

Policy H1 specifically identifies a need for an additional 100 dwellings within those sites located within Tier 4 of the hierarchy strategy.

Re. Policy S1, the Partnership for South Hampshire (PFSH) Spatial Position Statement (December 2023) acknowledges that in the longer term, broad areas of search for growth will need to be considered in local plans, including the contribution they can make to ongoing unmet housing need in the sub region. Currently none of these areas are identified and it is considered that identification of these would make for a more robust local plan.

The Partnership for South Hampshire cannot keep ‘kicking the can down the road’ like this. PFSH have been searching for Strategic Development Opportunity Areas for many years now, and put simply, have failed to identify any large strategic sites that can accommodate this need. We have no confidence that PFSH will be able to identify or bring forward any SDOAs. The LPAs must all address this need within their local plans, and at present, they are all failing to do so.

Policy NBE1 does not provide sufficient flexibility or allow for opportunities to effectively re-use brownfield land such as this where they are outside of settlement boundaries and within the countryside. The Dell can provide a good opportunity to deliver housing, through the replacement of the dwelling and a suitable development across part of the site, with the remaining part of the site given over to community paddocks and/or community allotments.

Overall, it is considered that the emerging policies do not go far enough to allow for the development of appropriate sites that fall outside of settlement boundaries. As it stands, the local plan fails to acknowledge the contribution that sites such as this could make to the overall housing land supply. To ensure local housing need is met, consideration should be given to;

- The allowance for appropriate sites on land outside of defined settlement boundaries, such as large plots that contain just a single dwelling.
- Greater flexibility to encourage the development of windfall sites in all parts of the district.

### Allocations outside of Settlement Boundaries

The NPPF clearly sets out the Government's objective of '*significantly boosting the supply of new homes*' and the consideration of housing allocations in locations outside of defined settlement boundaries on appropriate sites would be entirely appropriate, would accord with the NPPF and would help to deliver additional homes in the district, ultimately significantly boosting the supply of houses in accordance with Government aspirations.

The principle of residential development on the site has already been accepted by the existing dwelling and the grant of planning permission for the replacement of that dwelling. As such, this is a logical site for an allocation in the emerging local plan which has the potential to respond to local housing need.

This site provides an opportunity to effectively re-use a partly developed site to deliver social, environmental and economic benefits for the local area including;

- Provision of housing and contribution to housing land supply;
- Potential for provision of self or custom build units to respond to an identified need;
- Potential for affordable housing;
- Provision of a new public right of way;
- Potential for the provision of community allotments;
- Effective use of land in a sensitive manner;
- Provision of a use which is compatible with neighbouring residential properties, and;
- Benefits to biodiversity, including a Biodiversity Net Gain.

### Greater Flexibility for Windfall Sites

It is considered that providing in additional flexibility within emerging policies to encourage windfall development in all parts of the district would help to deliver additional homes and ultimately, to significantly boost the supply of houses within the district.

There is a real opportunity to build in greater flexibility to further encourage housing development delivered on windfall sites in all parts of the district. The consultation document and the Windfall Allowance Updated Methodology Paper, September 2022 acknowledge the contribution that windfall sites can make to meeting housing need. We consider that this should apply to sites both within and outside defined settlement boundaries.

Providing additional support for windfall sites more generally across the district could potentially help to deliver additional homes to meet local needs, significantly boosting the supply of housing in line with Government aspirations.

### Pre-Application

We have engaged with the Local Planning Authority via a pre-application, and we are pleased that there is recognition of the ability for the landowner to replace the dwelling with a much larger dwelling, and that it could include substantial outbuildings such as gymnasium, swimming pool, annexes etc. in combination



with barns and stabling to enable the remaining land to be used for horse-keeping etc. but we feel this is a wasted opportunity for the site.

There are already many large houses of that type in Medstead, but what the village desperately needs are smaller, family homes that will allow the current children of the village an opportunity to be able to live in the area within which they grew up.

As shown below, we note that some private drive style developments have already helped Medstead to meet its housing needs, and furthermore, this has helped create a building line that can assist with the provision of more new homes along the lane.



Aerial phot showing a cul-de-sac development to the west of The Dell and the establishment of a new building line

### Conclusion

In our view, housing is the single most important issue facing the district, and without an adequate supply of new homes in the district population growth and job growth will be stifled resulting in low economic growth overall which in turn detrimentally impacts the local economy and the provision of services and facilities for existing residents.

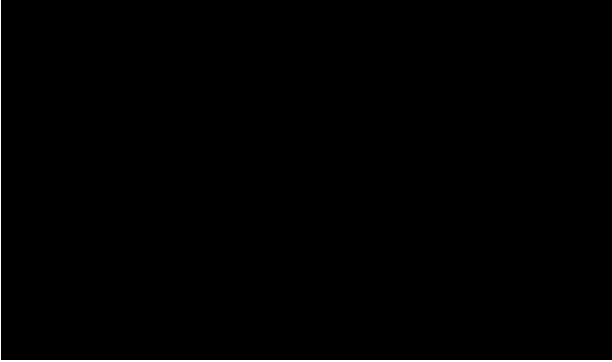
We consider that the provision of the district's full assessed housing needs in well-planned new developments is paramount and if this is not achieved, the local plan will be found unsound, and the consequences of an unsound local plan are too great in the current economic climate.

Whilst we agree that the settlement hierarchy is important, and it is in the interests of good planning to locate as much new development as possible towards the higher order settlements, it must also be recognised that lower order settlements and indeed some areas outside of settlements can be improved and enhanced in terms of their overall sustainability by accommodating new development there. It cannot therefore, be said that all development must adhere to pure arithmetic and arbitrary locations derived solely from measurements of distances from the settlement hierarchy. There must be allowances for exceptions.

I trust that this representation is helpful to the overall production of the local plan. Our aim is to ensure that the district benefits from a sound, positive local plan; which is a benefit to all. We respectfully request that this representation is considered as the local plan progresses.

We look forward to engaging further in the process and would be grateful if you could keep us updated. In the meantime, please do not hesitate to contact me to discuss further.

Yours faithfully



**From:** [REDACTED]  
**Sent:** 04 March 2024 12:35  
**To:** [EHDC - Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Gillings Planning - Draft Local Plan 2021-2040 Regulation 18 Consultation Representations  
**Attachments:** [Local Plan Reps March 2024 FINAL.pdf](#)

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**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Consultation Responses

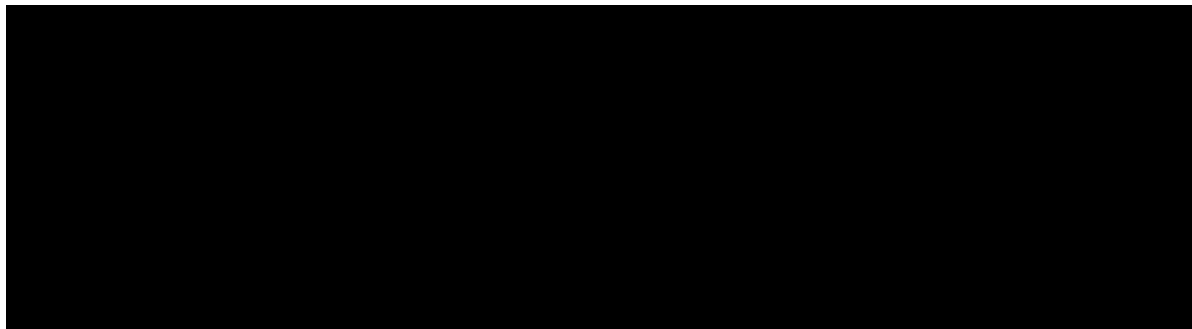
**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

Good afternoon

Please find attached representations, on behalf of our client, made in respect of the current Draft Local Plan 2021-2040 Regulation 18 Consultation.

I would be grateful for confirmation of their safe receipt and consideration within the Local Plan process.

Kind regards



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4<sup>th</sup> March 2024

REF: BUNC1001

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

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

Dear Sir / Madam,

**RE: Response to the East Hampshire District Council (EHDC) Local Plan 2021-2040 Regulation 18 – January 2024**

I act on behalf of our client, Silverdog Investments Limited, who have an ongoing interest in the following site which was submitted to and assessed by EHDC in the 2022 Land Availability Assessment (LAA):

*LAA/ROP-026: Land at Ropley Lime Quarry, Soame's Lane, Ropley, Alresford, SO24 0ER.*

Representations were also made on this site for the previous Regulation 18 consultation in January 2023.

For clarity, the location plan as submitted for the 2022 call for sites exercise and in the 2023 reps is shown below.



*Above: Site location plan showing the site outlined in red.*

These comments are made in response to the current EHDC Local Plan 2021-2040 Regulation 18 made under Regulation 18 (January 2024) of the Town and Country Planning Act (Local Planning) (England) Regulations 2012. This letter provides formal comments and I trust that these representations duly made within the determined timescales, will be formally accepted and considered by EHDC as the local plan progresses to the next stage.

I understand that my response will be published with my name and associated representation.

### Background to the site and planning history

By way of background, our client is a mortgagee in possession of this 4.079 ha site. This was submitted as a potential housing site for the 2022 LAA but has unfortunately been excluded by EHDC due to being 800m from the settlement policy boundary. As such, no detailed assessment of the site has been undertaken by EHDC.

The site has a lawful use as a quarry. It is subject to an Interim Development Order (IDO) permission (ref. F20209/6C) granted by HCC which allows for the working of the site for chalk from the 15th June 1994 to the 31st March 2042.

The site has remained vacant for a considerable number of years however quarrying is scheduled to recommence imminently.

Residential is considered to be an appropriate long-term solution for the site and the principle of this use has previously been accepted by EHDC under planning permission ref. 20209/007, a scheme for 6 dwellings which was approved by EHDC on the 19<sup>th</sup> September 2014. A more recent application made under ref. 20209/011 for 10 dwellings had officer support but was unfortunately refused by members of the Planning Committee on the 20<sup>th</sup> November 2018.

### Comments on relevant policies

#### Policy S1 – Spatial Strategy

Policy S1 sets out the need to deliver 9,802 new homes.

As set out within the Housing Background Paper, the Partnership for South Hampshire (PfSH) Spatial Position Statement (December 2023) details that there is an unmet need across the sub-region of approximately 12,000 homes to 2036. The Background Paper acknowledges that in the short to medium term the LPA should be able to meet housing needs.

The background paper also acknowledges that any dwellings surplus to the identified requirements could be attributed to any future identified unmet need, particularly in the South Hampshire region.

Of the 9,802 which are to be provided, the background paper indicates that considering those homes which have already been built or are committed through planning permission granted since 2021, there is a residual requirement of 2,857 homes. Factoring in an allowance of flexibility for those sites which do not come forward, the Local Plan identifies a need for 3,500 homes.

#### Policy S2 – Settlement Hierarchy

Policy S2 places Ropley within Tier 4 of the identified hierarchy of settlements and indicates that development outside of settlements will be restricted to that which is appropriate in a rural area as set out in policy NBE1 (which is addressed separately below). The policy acknowledges that development will be delivered through existing commitments, site allocations and through windfall development in accordance with other plans.

As discussed in Chapter 12, the site is within the North Area: Remining Settlements & Site Proposals. Policies BEN1, BWH1, BWH2 and MSD1 in Chapter 12 set out allocations for this area and do not include any sites within Ropley. The supporting Land Availability Assessment (LAA) November 2023 notes that this site is excluded purely because it is beyond the 800m settlement framework boundary.

#### Policy NBE1 – Development in the Countryside

Policy NBE1 is restrictive in the types of development it allows for within the countryside.

#### Policy H1 – Housing Strategy

Policy H1 specifically identifies a need for an additional 100 dwellings within those sites located within Tier 4 of the hierarchy strategy.

#### Comments re. site LAA/ROP-026

Re. Policy S1, the Partnership for South Hampshire (PFSH) Spatial Position Statement (December 2023) acknowledges that in the longer term, broad areas of search for growth will need to be considered in local plans, including the contribution they can make to ongoing unmet housing need in the sub region. Currently none of these areas are identified and it is considered that identification of these would make for a more robust local plan.

Policy NBE1 does not provide sufficient flexibility or allow for opportunities to effectively re-use brownfield land such as this where they are outside of settlement boundaries and within the countryside. Site LAA/ROP-026 could provide a good opportunity to deliver housing on an existing brownfield site, through the removal of a quarry use, in an area where there is existing housing established.

Site LAA/ROP-026 is available and would assist in contributing to meeting overall housing need throughout the plan period.

Overall, it is considered that the emerging policies do not go far enough to allow for the development of appropriate sites that fall outside of settlement boundaries. As it stands, the local plan fails to acknowledge the contribution that sites such as this could make to overall housing land supply. To ensure local housing need is met, consideration should be given to;

- The allowance for appropriate sites on land outside of defined settlement boundaries, such as previously developed land.
- Greater flexibility to encourage development on windfall sites in all parts of the district.

#### *Allocations outside of Settlement Boundaries*

The NPPF sets out the Government's objective of '*significantly boosting the supply of houses*' and the consideration of housing allocations in locations outside of defined settlement boundaries on appropriate sites would be entirely appropriate and would help to deliver additional homes in the district, ultimately significantly boosting the supply of houses in accordance with Government aspirations.

This could include site LAA/ROP-026 and it is disappointing that this site has been excluded in the recent LAA and in the consultation documents purely for being beyond 800m of the settlement boundary for Ropley. The principle of residential development has already been accepted through the granting of planning permission for 6 dwellings under ref. 20209/007. As such, this is a logical site for an allocation in the emerging local plan which has the potential to respond to local housing need.

This site provides an opportunity to effectively re-use brownfield land and to deliver extensive social, environmental and economic benefits for the local area including;

- Provision of housing and contribution to housing land supply.
- Potential for provision of self or custom build units to respond to an identified need.
- Restoration of a working quarry which has permission to operate until 2042.
- Effective use of land in a sensitive manner.
- Provision of a use which is compatible with neighbouring residential properties.
- Extensive benefits to biodiversity, including Biodiversity Net Gain.

### *Greater Flexibility for Windfall Sites*

It is considered that building in additional flexibility within emerging policies to encourage windfall development in all parts of the district would help to deliver additional homes and ultimately, to significantly boost the supply of houses within the district.

There is a real opportunity to build in greater flexibility to further encourage housing development delivered on windfall sites in all parts of the district. The consultation document and the Windfall Allowance Updated Methodology Paper, September 2022 acknowledge the contribution that windfall sites can make to meeting housing need. We consider that this should apply to sites both within and outside defined settlement boundaries.

Providing additional support for windfall sites more generally across the district could potentially help to deliver additional homes to meet local needs, significantly boosting the supply of housing in line with Government aspirations.

### **Conclusion**

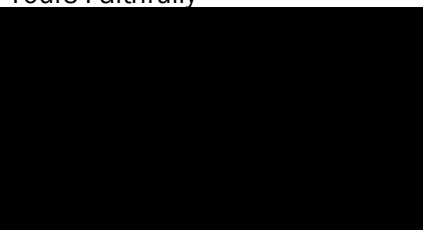
In our view, housing is the single most important issue facing the district, and without an adequate supply of new homes, job growth will be stifled resulting in low economic growth overall which in turn, will impact the local economy and the provision of services and facilities for existing residents.

We consider that the provision of the district's full assessed housing needs in well-planned new developments is paramount and if this is not achieved, the local plan will be found unsound, and the consequences of an unsound local plan are too great in the current economic climate.

Whilst we agree that the settlement hierarchy is important, and it is in the interests of good planning to locate as much new development as possible towards the higher order settlements, it must also be recognised that lower order settlements and indeed some areas outside of settlements can be improved and enhanced in terms of their overall sustainability by accommodating new development there. It cannot therefore, be said that all development must adhere to pure arithmetic and arbitrary locations derived solely from measurements of distances from the settlement hierarchy. There must be allowances for exceptions.

I trust that this submission is useful in confirming my client's comments on the Regulation 18 – January 2024 consultation. We respectfully request that the points noted above are considered and reflected as the plan progresses. We look forward to engaging further in the process and would be grateful if you could keep us updated. In the meantime, please do not hesitate to contact me to discuss further.

Yours Faithfully









# **East Hampshire District Council Local Plan 2021-2040**

**Regulation 18 Part 2 Consultation**

March 2024



[gladman.co.uk](https://www.gladman.co.uk)



01260 288888

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# 1 INTRODUCTION

## 1.1 Context

- 1.1.1 Gladman Developments Ltd (Gladman) welcomes the opportunity to comment on the East Hampshire District Council (EHDC) Regulation 18 Part 2 Local Plan consultation and requests to be updated on future consultations and the progress of the Local Plan.
- 1.1.2 Gladman has become the country's largest, longest established and most successful promoter, having been formed 35 years ago. To date, we have successfully promoted over 230 sites, totalling over 35,000 dwellings, all without cost to our landowner partners.
- 1.1.3 Gladman specialises in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman has been involved throughout the plan preparation process of the emerging East Hampshire Local Plan, having previously submitted representations on the Regulation 18 Part 1 consultation in January 2023.
- 1.1.4 Gladman has one land interest in East Hampshire which is being promoted through the emerging Local Plan. This is land at Lymington Bottom, Four Marks for up to 60 dwellings. The site is available, suitable, and deliverable for housing as summarised in Section 5 of this representation. Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

## 2 LEGAL COMPLIANCE

### 2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, the councils must be able to demonstrate that they have engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs.
- 2.1.2 The Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process<sup>1</sup>. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 2.1.3 The Housing Background Paper (January 2024) recognises that the unmet needs of neighbouring authorities are currently unknown but it is likely that due to landscape sensitivities there will be unmet needs arising from within the South Downs National Park area. The Partnership for South Hampshire (PFSH) Spatial Position Statement (December 2023) states there is an unmet need across the sub-region of approximately 12,000 homes to 2036. It is vital that these needs are addressed in full by the PFSH authorities and Gladman welcomes the position that Fareham District Council has taken in identifying a contribution in its adopted Local Plan to the unmet housing needs of PFSH.

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<sup>1</sup> PPG Reference ID: 61-001-20180913

- 2.1.4 East Hampshire District Council should look to set out its contribution to the unmet housing needs of the PFSH within the Local Plan and DtC/SOCG documents.

## 2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 It is noted that the Council has produced an Integrated Impact Assessment (IIA) Scoping Report (January 2024) which will integrate four different assessments: SA, Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). An IIA for the draft Local Plan has been prepared.
- 2.2.3 East Hampshire District Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified and transparent.

## 3 NATIONAL PLANNING GUIDANCE

### 3.1 National Planning Policy Framework

3.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied for both plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seeks to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

3.1.2 The NPPF sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

3.1.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

3.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the East Hampshire Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

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- 3.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.6 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in its area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. Annex 2 of the Framework (2023) defines the terms “deliverable” and “developable”.
- 3.1.7 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b) part i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met (see Paragraph 35 of the NPPF 2023).



## **4 EAST HAMPSHIRE LOCAL PLAN CONSULTATION**

### **4.1 Background**

4.1.1 East Hampshire District Council began preparing a new local plan in late 2017 with two Regulation 18 consultations conducted in 2019. In May 2022, work on the local plan was suspended and the Leader confirmed at Full Council that the plan would be returning to Regulation 18 stage. A Part 1 Regulation 18 consultation took place in November 2022 until January 2023. This current Part 2 consultation sets out the preferred strategy for meeting the development needs of the district.

4.1.2 Gladman support the Council's timescales relating to the new Local Plan as set out at page 21 of the document.

4.1.3 The sections that follow below include specific comments from Gladman on the Council's proposed policies covering the range of the topics included within the draft plan.

### **4.2 Policy 1 Spatial Strategy**

4.2.1 The policy states that over the plan period (2021-2040) the plan will make provision for 9,082 new homes, equivalent to 478 homes per annum. Whilst Gladman recognises that EHDC has taken into consideration the need to assist the South Downs National Park Authority (SDNPA) in meeting its housing needs, it does question whether the addition of 14 dpa is a sufficient quantum. This is especially important given the constrained nature of the SDNPA and also the recognition that there is an additional level of unmet need across the PFSH sub-region of 12,000 homes.

4.2.2 Gladman's view is that the Council's current approach does not go far enough to address the unmet needs arising from surrounding areas. The Council should reconsider its strategy to support neighbouring areas and make an allowance for this within the housing requirement.

4.2.3 The Council proposes to make provision for 3,500 new homes against a residual requirement of 2,857 homes and suggests that any homes delivered in excess of its housing requirement could be attributed towards meeting those unmet needs. However, Gladman contends that this approach is unsound. The Council should make a commitment to delivering homes to meet unmet needs as part of its housing requirement, any surplus identified is necessary in ensuring their own needs are delivered and offers an

element of flexibility. In addition, it is considered that the supply buffer is not sufficient to provide both a flexibility against the Council's own requirements and an appropriate scale of contribution to help address housing needs from PfSH.

### **4.3 Policy S2 Settlement Hierarchy**

4.3.1 Gladman supports the identification of Four Marks as a Tier 3 Settlement within the Settlement Hierarchy which demonstrates its sustainability to accommodate an appropriate level of further housing growth to support its existing services.

4.3.2 It is also noted that the Tier 3 settlements provide a focal point for the surrounding villages and rural areas due to their level of services and they are recognised as sustainable locations.

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

4.4.1 Whilst Gladman agrees with the need to reduce carbon emissions, our view is that it would be more appropriate for this to be achieved outside of the local plan process through Building Regulations. There is already a national approach, the Future Homes Standard, which aims to achieve this goal therefore it is not necessary to include this policy within the draft Local Plan.

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

4.5.1 The supporting text for Policy H1 states that there is a residual requirement for 2,857 new homes to be identified in the plan however to allow for flexibility the suggestion is to allocate land for 3,500 homes.

4.5.2 The Housing Trajectory at Appendix C shows a total of 9,677 homes over the plan period against the total requirement of 9,082 which results in a buffer of around 6%. Gladman considers that this buffer is insufficient to ensure that needs are met in full over the plan period and that further flexibility should be built into the plan. The HBF recommends adopting a buffer of between 10 and 15% to allow for sufficient flexibility. It is therefore Gladman's view that further site allocations should be identified to ensure the Council's own needs are met and a sufficient contribution towards the PfSH unmet housing needs can be made.

## 5 SITE SUBMISSION

### 5.1 Lymington Bottom, Four Marks

5.1.1 Land to the west of Lymington Bottom is proposed for development of up to 60 dwellings including affordable housing, public open space, landscaping, sustainable drainage system (SuDS) and vehicular access. The site was subject to an outline planning application submitted in March 2023 and an appeal was heard by way of public inquiry in February 2024. At the time of writing, the appeal decision has not been issued.



**Figure 1: Lymington Bottom, Four Marks Development Framework Plan**

5.1.2 Four Marks is identified as a Tier 3 Settlement within the hierarchy included at Policy S2 and as recognised at paragraph 3.38, 'Tier 3 settlements across the Local Plan Area often provide a focal point for the surrounding villages and rural areas in terms of the provision of local services and facilities. Although they do not have as wide a range of services as the higher order settlements (Tiers 1 & 2), they are still sustainable locations.'

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5.1.3 The site represents a logical extension to the settlement and as demonstrated by the technical reports submitted with the application and the evidence prepared for the appeal, there are no technical constraints that would preclude the development of the site.

## 6 CONCLUSIONS

### 6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the draft East Hampshire Local Plan Regulation 18 Part 2 consultation that is currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2023) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman has provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 6.1.3 Gladman recommends that EHDC reconsiders its overarching strategy towards the delivery of housing in the district to ensure that the unmet needs arising from surrounding areas, especially the SDNPA can be met.
- 6.1.4 We hope you have found these representations informative and useful towards the preparation of the East Hampshire District Local Plan.
- 6.1.5 Gladman welcomes any future engagement with the Council and if you would like to discuss this representation or other matters, please contact us at [policy@gladman.co.uk](mailto:policy@gladman.co.uk).





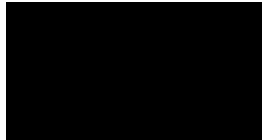
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Enquiries to

Direct Line

Date



07/03/24

My reference Y00509 landowner letter

Your reference EHDC Local Plan 2021-2040

E-mail



Dear Sir/ Madam,

**Re: East Hampshire District Council (EHDC) Local Plan 2021-2040 consultation from Monday 22 January until 08 March 2024.**

I write in response to the current Local Plan consultation on behalf of Hampshire County Council (HCC) as landowner in relation to the draft site allocations below:

1 Policy W&B7 Land at Hollywater Road and Mill Chase Road

1.1 The County Council as landowner welcomes the draft allocation of Land at Hollywater Road and Mill Chase Road for the development of new homes and Suitable Alternative Natural Greenspace (SANG). The red line allocation boundary includes both the potential development to the north of the Whitehill Cemetery access road and the SANG to the south. This approach is supported by the County Council as it recognises the connection between the residential development and the SANG that will be used to mitigate the proposed allocation.

1.2 The County Council agrees with the 'Summary of Reason for Inclusion' and the overall principle of development, which identifies that the northern part of the site is suitable for residential development given its location and proximity to the existing urban settlement.

1.3 As an update, the SANG to the south has been granted planning permission (planning application ref. [59833](#)) and will be named 'Hollywater Meadows'. The SANG is expected to be open for use in the summer of 2024, and should therefore be operational before the Regulation 19 consultation. The SANG is within the County Council's landownership and will be managed on an ongoing basis. The total SANG area is 9.71ha, of which 2.82ha is needed to mitigate the development at the Former Mill Chase Academy site for 147 dwellings (planning ref. [22024/012](#)). The remaining

6.89ha capacity within the SANG will be sufficient to mitigate residential development within the Policy W&B7 allocation (requiring approximately 2.40ha of the SANG capacity), with any surplus SANG capacity available to potentially mitigate future windfall developments on commercial terms to be agreed.

1.4 The County Council as landowner has the following points to raise specifically on the policy wording, which are set out in the table below. The County Council as landowner welcomes further discussion with the District Council in shaping the emerging concept masterplan for the site and preparing the next iteration of the draft Policy W&B7 in the Regulation 19 Local Plan.

Draft Policy W&B7	HCC comments
<p>Page 385, Information Box:</p> <p><i>Site Size (ha): 4.5ha</i></p>	<p>The total area within the red line boundary is 15.53ha. The northern parcel for residential development is 5.82ha, and the consented SANG is 9.71ha. We suggest that the site size is amended to reflect the total area of 15.53ha, and acknowledge the land area of the SANG such as follows: “<u>Site Size (ha): 15.53ha (including an area of SANG of 9.71ha with planning permission)</u>”</p>
<p>Page 385, Information Box:</p> <p><i>Existing Use: Agriculture</i></p>	<p>The northern part of the site comprises a former school playing field land and an agricultural field. The southern part is the permitted SANG, and should be operational ahead of the Regulation 19 consultation in July 2024. We therefore suggest ‘Existing use’ to be amended with “<u>Former playing field, agriculture and SANG</u>”.</p>
<p>Page 385, Information Box:</p> <p><i>Proposed number of Homes: 126</i></p>	<p>Only high-level site capacity testing has been undertaken at this stage. The County Council, as landowner, welcomes further discussions with EHDC to progress and shape the emerging proposals for the site to assist the District Council in preparing the draft allocation policy for the Reg.19 local plan. As such, we recommend at this point, the quantum of new homes could be stated as “<u>approximately 125 units</u>” to provide flexibility for the concept masterplan to evolve and refine as the local plan progresses towards Regulation 19 stage.</p>
<p>Page 385, Site description, para. 2:</p> <p><i>It comprises agricultural land associated with Stanford Grange Farm.</i></p>	<p>As mentioned earlier, the site comprises <u>former playing field</u> land, agricultural land and Hollywater Meadows SANG. This site description should be updated as above.</p>
<p>Page 385, Site description, para. 2:</p> <p><i>The southern part of the site has planning permission for the creation on</i></p>	<p>We recommend the following amendment to clarify the position of SANG and its mitigation capacity.</p> <p>“<u>The southern part of the site comprises Hollywater Meadow SANG, which was granted planning</u>”</p>



<p><i>an area of suitable alternative natural greenspace (SANG), to mitigate recreational disturbance of the Wealden Heaths Phase II SPA in relation to the redevelopment of the former Mill Chase secondary school and leisure centre.</i></p>	<p><u>permission (planning ref. 59833) to offset any recreational disturbance from new development within the catchment of the Wealden Heaths Phase II SPA . Hollywater Meadows SANG is to mitigate the development at the Former Mill Chase Academy School site; however, there is sufficient capacity to mitigate the impact of residential development within the W&amp;B7 allocation and surplus SANG capacity available for future windfall development in the locality.</u></p>
<p>Page 385, Site description, para. 2:</p> <p><i>The site and its boundaries contain mature trees and hedgerows, with a strong line of mature trees bisecting the northern part of the site.</i></p>	<p>We suggest the following amendment to the description which reflects the landscape features:</p> <p><u>“The site and its boundaries contain mature trees and hedgerows. There is an existing field boundary that defines the former playing field land and farm field, which comprises some mature trees and overgrown hedges.”</u></p>
<p>Page 386, List of constraints and opportunities:</p> <p><i>Agricultural land quality: although much of the site is lower quality agricultural land (Grade 4), some areas could be Grade 3 agricultural land, which is a finite resource.</i></p>	<p>As the site comprises a former playing field and SANG (which would be completed and operational by the time this Local Plan is adopted), we suggest that the wording was amended to make it clear that ‘agricultural land quality’ is referring to the southeastern corner of the northern part of the site. We suggest the following amendment:</p> <p><u>“Agricultural land quality: The site mainly comprises SANG and former playing field land. The agricultural field is Grade 3 agricultural land, with a provisional classification of Grade 4”</u></p>
<p>Page 387, Summary of Reasons for Inclusion:</p> <p><i>The development of the southern area for SANG provides a wide range of opportunities for increasing natural habitats and <u>achieving a net gain to biodiversity.</u></i></p>	<p>As mentioned above, the SANG would have been completed and in use by the time this Local Plan is adopted. For consistency, we suggest the following amendment:</p> <p><u>“Hollywater Meadows SANG could provide a wider range of opportunities for increasing natural habitats and achieving a net gain in biodiversity.”</u></p>
<p>Page 387, Summary of Reasons for Inclusion:</p> <p><i>Potential impacts on the Wealden Heaths Phase II SPA could be mitigated within this area, or <u>through further expansion of the permitted SANG (if required).</u></i></p>	<p>The County Council would retain the existing farm holding to the south of the SANG as an operational farm. We therefore request to remove <i>“through further expansion of the permitted SANG (if required).”</i> and suggest the following amendment:</p> <p><u>“Potential impacts on the Wealden Heaths Phase II SPA arising from the development of the allocated site</u></p>

	<p><u>and other future windfall development could be mitigated by Hollywater Meadows SANG.”</u></p>
<p>Page 387, Infrastructure Requirements:</p> <p>Suitable Alternative Natural Greenspace: a sufficient area of SANG would need to be provided in order to mitigate the potential for recreational disturbance at the nearby Wealden Heaths Phase II SPA. <u>A legal agreement is already in place to secure the provision, implementation and long-term maintenance of SANG</u> in the southern part of the site, in connection with the delivery of new housing at the former Mill Chase School Academy School site.</p>	<p>Hollywater Meadows SANG already has planning consent and will be operational by the time of this Local Plan is adopted. It is our view that the SANG requirements should be kept focused on the draft allocation and the proposed development, and remove reference to the development at former Mill Chase Academy site, which has already received planning consent and is under construction. As landowner of the SANG, it is the County Council’s intention to use the SANG for mitigation of the development at the draft allocation site, and with any remaining surplus SANG made available for future windfall / third-party development sites.</p> <p>We therefore suggest the following amendment:  <u>“A sufficient area of SANG would need to be provided to mitigate the potential recreational disturbance on Wealden Health Phase II SPA arising from the development. Available SANG capacity at Hollywater Meadows SANG would be used for mitigation of the development, secured through a Section 106 agreement.”</u></p>
<p>Page 387, Infrastructure Requirements:</p> <p><i>Access: Connections to pedestrian and cycle infrastructure along Mill Chase Road and connection to the adjacent public right of way would be required.</i></p> <p><i><u>Improvements to the Whitehill Cemetery access road and/or a new road connection to Hollywater Lane would also be necessary to support development. It should be noted that the highways authority has speed-related concerns for connections to Hollywater Road which may require mitigation.</u></i></p> <p><i>Opportunities to improve connections to the new town centre also need to be considered.</i></p>	<p>As mentioned, only high-level of site design testing has been undertaken at this point, it is yet to be certain whether any improvements to the Whitehill Cemetery access road would be required. We suggest amending the text as below:</p> <p><u>“A new primary access road connecting to Hollywater Road would be required to support development. If required, subject to further transport and highway feasibility, a secondary or emergency access could be provided connecting to Whitehill Cemetery access road.”</u></p>
<p>Page 387, Infrastructure Requirements:</p> <p>On-site drainage: the site has been identified <u>as probably compatible with infiltration sustainable drainage systems</u>. Appropriate infrastructure will be required to mitigate flood risks.</p>	<p>The mentioning of ‘infiltration’ sustainable drainage systems (SuDS) is specific and may not be applicable to the whole site, and will be subject to ground conditions, topography and surface water flow. We suggest removing the term ‘infiltration’ and keeping the generic reference to SuDS as this could include different flood mitigation approaches such as attenuation and discharge and/or infiltration where</p>

	<p>appropriate. We suggest amending the policy text as follow:</p> <p>“Appropriate infrastructure will be required to mitigate flood risks, <u>including the use of sustainable drainage systems (SuDS) where feasible.</u>”</p>
--	--

**2 Policy CFD1 Land at Clanfield County Farm**

- 2.1 Hampshire County Council as landowner has prepared this supporting statement, to provide further information on the availability and site capacity of Policy CFD1 Land at Clanfield County Farm, with a draft allocation for 100 dwellings.
- 2.2 Hampshire County Council as landowner supports the inclusion of this draft allocation and confirms this site is available, suitable and achievable to deliver a minimum of 100 dwellings.
- 2.3 Hampshire County Council has undertaken a series of technical assessments and ongoing engagement with the District Council and key stakeholders to bring the site forward for development in a timely manner. To date, these studies all demonstrate the site is suitable for residential development, and that any issues or sensitivities can be accommodated through an appropriate design response and mitigation measures.
- 2.4 These studies comprised of initial advice on flooding, drainage and landscape impact, which helped shape the emerging proposals for the site in earlier iterations of East Hampshire’s Local Plan consultations.
- 2.5 The delivery of minimum 100 dwellings would require circa 0.78 hectares of public open space in accordance with open space standards set out in Policy DGC5. This would result in a net site area of 3.75 hectares, and a net density of 27 dph. Based on the average net density of infill sites in recent years, this could increase a net site capacity to approximately 110 dwellings, taking into account a small increase in the public open space policy requirement. The land budget calculation is presented below:

<b>Figure 1: Land budget calculation</b>	
Open space calculation	<p>110 dwellings x 2.4 average person per household = 264 people</p> <p>(3.24 ha ÷ 1000) open space standard x 264 people = 0.87 ha</p> <p>Gross site area 4.53 ha – 0.87 ha open space = 3.66 ha</p>
Net density and yield	<p>3.66 ha x 30 dph = 110 dwellings</p>

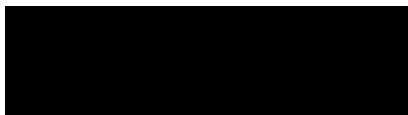
- 2.6 Based on these calculations, the site is considered to have potential to deliver minimum 100 dwellings.
- 2.7 As landowner, Hampshire County Council recommend that the following amendments are made to Policy CFD1 Land at Clanfield County Farm: 'The site is likely to accommodate a minimum of 100 dwellings.'
- 2.8 This would ensure a more effective contribution to the supply of housing required over the Plan period for the borough and be in line with draft Policy DES3 'allocated sites must optimise the density of new residential uses through making an efficient use of land, whilst delivering a contextually appropriate and coherent built form.'
- 2.9 Hampshire County Council, as landowner, is keen to continue working with East Hampshire District Council as part of its responsive approach to strategic land promotion. The County Council looks forward to receiving feedback on the draft allocation Policy W&B7 and Policy CFD1 and to support the delivery of the District Council's housing and community infrastructure needs as effectively as possible, in the next stages of the emerging East Hampshire District Council Local Plan.

### 3 Policy HDN1 Land at Woodcroft Farm

- 3.1 Hampshire County Council as a frontage landowner has an agreement in place with the landowner of the Policy HDN1 draft allocation regarding access rights, to support any future development, and acknowledges its inclusion as a draft site allocation.

If you require any further information at this time please get in touch.

Yours sincerely,



Hampshire 2050

Our Ref: STE-018-P

Date: 29<sup>th</sup> February 2024

**East Hampshire District Council**

Planning Policy

Penns Place

Petersfield

Hampshire

GU31 4EX

Sent by email only to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

Dear Sir/Madam,

**East Hampshire Local Plan 2021-2040 Regulation 18 Draft Plan Consultation –  
Representations on Behalf of Star Energy Group PLC**

Introduction

These comments are submitted on behalf of our client, Star Energy Group PLC ('Star Energy') who have land and mineral interests within East Hampshire District. Star Energy is a British onshore energy company listed on the Alternative Investment Market of the London Stock Exchange who deliver a mix of natural gas and crude oil to the UK's energy market and are actively developing a geothermal business, utilising the skill sets learned from oil and gas, as we transition to a renewable future.

Star Energy has more than thirty years' experience of successfully and safely extracting and producing hydrocarbons onshore in the UK, working closely with local communities, regulators, and Mineral Planning Authorities (MPAs). The UK is recognised globally as a leading example for oil and gas industry regulation. With considerable experience in onshore drilling and field development, Star Energy develops hydrocarbon reserves which contribute to Britain's energy security.

**Heatons**

The Arc, 6 Mallard Way, Pride Park, Derby, DE24 8GX

tel: 01332 949 656 email: [consultants@heatonplanning.co.uk](mailto:consultants@heatonplanning.co.uk) web: [www.heatonplanning.co.uk](http://www.heatonplanning.co.uk)

Oil and gas are both naturally occurring sources of energy which met 75% of energy demand within the UK in 2022 (UK Energy In Brief, 2022: Department for Business, Energy & Industrial Strategy).

The purpose of this letter is to represent the interests of the oil and gas industry within Hampshire and East Hampshire and highlight that, despite important commitments to decarbonise the economy, there is a need for and continued reliance on fossil fuels for the foreseeable future. Indeed, every scenario produced by the Climate Change Committee demonstrates a continuing role for oil and gas throughout the transition to and at the outcome of achieving net zero. Therefore, consideration of this ongoing need for and reliance on fossil fuels particularly from an energy security point of view, should be given consideration when drafting policies and allocating land within the emerging Local Plan.

#### Star Energy Interests in East Hampshire

Star Energy has two operational interests within the planning area of East Hampshire. Horndean B oil wellsite comprises one of three wellsites which extract from the Hordean Oilfield. The wellsite was drilled in the 1980s and has planning permission to operate until 2035 (Hampshire County Council ref: 52417/001). The site's location is shown in Figure 1.



Figure 1. Horndean B Site Location Map. *Google Maps 2024.*

Holybourne is an export terminal and railhead which is currently being consolidated and part of the site developed into an aggregate handling and storage depot. The site may continue to receive and export oil. The site's location is shown in Figure 2.



Figure 2. Holybourne Terminal Site Location Map. *Google Maps 2024.*

#### Hampshire Minerals and Waste Plan (2013)

The Adopted Minerals and Waste Plan includes the vision, spatial strategy and core policies which set out the key principles to guide the future winning and working of minerals in Hampshire over the plan period to the end of 2030.

Throughout the Plan, there is a positive approach to mineral development, as minerals and energy minerals are governed by geology and have to be developed on site, which leads to a proactive response to need of extraction and working.

Adopted Policy 15: 'Safeguarding Mineral Resources' and the Policies Map identifies Mineral Safeguarding Areas (MSA) and Minerals Consultation Area (MCA). Horndean B wellsite and Holybourne terminal are identified as safeguarded sites within a MSA and MCA.

Adopted Policy 16 'Safeguarding – minerals infrastructure' seeks to protect existing mineral sites from new development which would unnecessarily sterilise the infrastructure or prejudice or jeopardise its use by creating incompatible land uses nearby.

Adopted Policy 24 'Oil and gas development' supports the exploration, appraisal and commercial production of oil and gas in Hampshire subject to environmental and amenity considerations.

### National Planning Policy Framework and Guidance

#### *National Planning Policy Framework 2023*

There is a degree of established responsibility for planning policies at local, regional and national levels to safeguard mineral resources and mineral operations from sterilisation by non-mineral developments and policy making. The National Planning Policy Framework (NPPF) proposes a positive approach towards mineral development across the UK.

Paragraph 7 of the NPPF defines the objective of sustainable development, which can be summarised as meeting the needs of the present without comprising the ability of future generations to meet their own needs.

Paragraph 8 of the NPPF states that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. These are:

- *'An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- *An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.*

Paragraph 35 states that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:



- a) **Positively prepared**
- b) **Justified**
- c) **Effective; and**
- d) **Consistent with national policy**

Section 17 of the NPPF relates specifically to '*facilitating the sustainable use of minerals*'. Paragraph 215 states it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Paragraph 217 confirms that great weight should be given to the benefits of mineral extraction, including to the economy.

Paragraph 221a states that Minerals Planning Authorities should 'when planning for on-shore oil and gas development, clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for.

#### *Planning Practice Guidance 2014*

The responsibility for safeguarding mineral resource is not limited to Mineral Planning Authorities. Paragraph: 005 (Reference ID: 27-005-20140306) of the Planning Practice Guidance (Minerals) identifies that, '*whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in three ways:*

- *having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps;*
- *in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and*
- *when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.'*

#### East Hampshire Draft Plan 2021-2040 (Regulation 18) Consultation

The Draft Local Plan provides respondents with the opportunity to comment on proposed planning policies, site allocations, and the strategy and vision which will then be developed into a Proposed Submission document.

The Draft Local Plan emphasises the importance of responding to the climate emergency and includes a number of policies to mitigate it and adapt to its impacts.

**Draft Policy CLIM1** states among other things that development must contribute to mitigating future climate change to meet local, national and international climate-related objectives. **Draft Policy CLIM2** states new development will demonstrate how it addresses the climate emergency through implementing a number of draft principles.

**Comments** – The draft policies seek to take a proactive response to climate change through mitigating emissions and minimising the consumption of natural resources. Whilst this is not objected to in principle, the Local Plan must also take consideration of the aims and policies of the Hampshire Minerals and Waste Plan and the NPPF, which support the ongoing supply of minerals as well as the exploration and production of new indigenous oil and gas resources. The NPPF is clear that an emerging Local Plan must be consistent with national policy in order to be considered ‘sound’.

**Draft Policy NBE1** ‘Development in the Countryside’ supports certain forms of development in rural locations but does not refer to minerals development.

**Comments** – The PPG confirms that District plans have a role to play in minerals planning and development. In order to be consistent with the Minerals and Waste Plan and remove any potential ambiguity, it is considered a criteria supporting minerals development in the countryside (with reference made to the Minerals and Waste Plan) should be added to Policy NBE1.

**Draft Policy NBE13 ‘Protection of Natural Resources’** states, among other things, development will be expected to demonstrate that it does not sterilise mineral resources identified as of particular importance unless it can be demonstrated that it would not be practicable and environmentally feasible to extract the identified mineral resource prior to development taking place. The consultation also publishes a draft Policies Map, however, at present this does not include the Mineral Safeguarding and Mineral Consultation Areas designated by the adopted Hampshire Minerals and Waste Plan.

**Comments** – Star Energy support the policy provision for safeguarding mineral resources in Policy NBE13 and it is important this is retained as the Local Plan is developed. However, the PPG clearly states that District Policy Maps should also show adopted Mineral Safeguarding and Mineral Consultation Areas. Horndean B wellsite and Holybourne terminal are both safeguarded mineral infrastructure sites, such that MPA must be consulted on all applications within their MCA. Identifying Mineral Safeguarding and Mineral Consultation Areas on the District Policies Maps contributes to safeguarding mineral infrastructure by helping to ensure the MPA is

consulted and development is not granted which could prejudice a mineral site or its infrastructure. This inclusion also helps applicants identify when their site is within a safeguarded area and overall raises awareness of the importance of minerals and waste planning.

#### Final Remarks and Conclusion

Star Energy is keen to engage with the preparation of the East Hampshire Local Plan and ensure that it is prepared in a manner consistent with national policy and the Hampshire Minerals and Waste Local Plan. The National Planning Policy Framework (NPPF) is unambiguous in placing great weight on the importance of extracting mineral resources from within the UK and this is reflected in the Minerals and Waste Local Plan.

Star Energy support the wording of Policy NBE13 in relation to minerals development, however, a similar criteria should also be included in Policy NBE1. Moreover, the emerging Policies Maps should show Mineral Safeguarding and Mineral Consultation Areas as stated in the PPG.

It is considered that the above amendments will contribute to fulfilling the role of East Hampshire in minerals planning and help to ensure it is consistent with the NPPF and the Minerals and Waste Local Plan.

We would welcome opportunity to discuss the contents of this letter with you. Should you have any queries please do not hesitate to contact us.

Yours faithfully

**Heatons**

Our Ref: TAR-221-P

Date: 1<sup>st</sup> March 2024

**East Hampshire District Council**

Planning Policy

Penns Place

Petersfield

Hampshire

GU31 4EX

Sent by email only to: [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

Dear Sir/Madam,

**East Hampshire Local Plan 2021-2040 Regulation 18 Draft Plan Consultation –  
Representations on Behalf Tarmac Trading Ltd**

Introduction

These comments are submitted on behalf of our client, Tarmac Trading Ltd (Tarmac) which has land and mineral interests within East Hampshire District. Tarmac is one of the UK's leading sustainable building material companies with innovative products, solutions and services not only delivering infrastructure needed to grow the UK economy, but also enabling a more sustainable built environment for the country's long term future.

Tarmac has contributed to some of the UK's biggest construction projects, including Wembley Stadium, Heathrow Terminal 5, The Shard, and the London 2012 Olympic and Paralympic Games. They have strong partnerships that have been forged with wildlife trusts and other leading conservation bodies in the UK and work closely with local communities, steering groups, local councils, and Mineral Planning Authorities (MPA).

Minerals are naturally occurring materials that are used for everyday purposes. As minerals are naturally occurring and are a finite resource, they are required to be worked and extracted from their locality, due to this, mineral planning is a key consideration within all planning decisions

**Heatons**

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and MPAs must be consulted on applications which could impact important mineral resources and infrastructure.

The purpose of this letter is to represent the interests of the mineral industry within Hampshire and East Hampshire. This letter highlights the importance of mineral safeguarding policies and the role District Councils can play in minerals and waste planning. Minerals safeguarding, as set out in the National Planning Policy Framework and Hampshire Mineral and Waste Local Plan, is vital to sustain the production and transportation of materials for the UK. Mineral sites also make important contributions to the local and national economy.

### Tarmac Interests in East Hampshire

Tarmac has one interest within the planning area of East Hampshire; Kingsley Quarry. Kingsley Quarry was first granted planning consent in 1966 and an eastern extension to the quarry was approved in May 2018 (Hampshire County Council planning ref: 51188/003). The quarry supplies sand for both construction and non-construction uses and is one of only two quarries in Hampshire producing silica sand. The site location is shown in Figure 1.



Figure 1. Kingsley Quarry Site Location. *Google Earth, 2024.*

## Hampshire Minerals and Waste Plan (2013)

The Adopted Minerals and Waste Plan includes the vision, spatial strategy and core policies which set out the key principles to guide the future winning and working of minerals in Hampshire over the plan period to the end of 2030.

Policy 1: 'Sustainable Minerals and Waste Development' states that the MPA will take a positive approach to mineral development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Policy 15: 'Safeguarding Mineral Resources' seeks to safeguard Hampshire's sand and gravel, silica sand and brick-making clay resources against needless sterilisation by non-minerals development. The Policy and Adopted Policies Map identifies Minerals Safeguarding Areas (MSA) and Minerals Consultation Areas (MCA). Kingsley Quarry is a safeguarded site.

Policy 16: 'Safeguarding Minerals Infrastructure' seeks to protect existing mineral sites from new development which would unnecessarily sterilise the infrastructure or prejudice or jeopardise its use by creating incompatible land uses nearby.

Kingsley Quarry is also identified in Policy 20 'Local land-won aggregates' and Policy 21 'Silica sand development' as a site which is part of providing a steady supply of locally extracted sand and gravel and silica sand. This includes extensions to the identified sites.

## National Planning Policy Framework and Guidance

### *National Planning Policy Framework 2023*

There is a degree of established responsibility for planning policies at local and national levels to safeguard mineral resources and mineral operations from sterilisation. The National Planning Policy Framework (NPPF) proposes a positive approach towards mineral development across the UK.

Section 17 of the NPPF relates specifically to '*facilitating the sustainable use of minerals*'. Paragraph 215 states it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.

Paragraph 216 states that planning policies should safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas and adopt appropriate policies so that known locations of specific mineral resources of local and national importance are not sterilised by non-mineral development.

The responsibility for safeguarding mineral resource is not limited to Mineral Planning Authorities. Paragraph: 005 (Reference ID: 27-005-20140306) of the Planning Practice Guidance (Minerals) identifies that, *‘whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in three ways:*

- *having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps;*
- *in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and*
- *when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.’*

#### East Hampshire Draft Plan 2021-2040 (Regulation 18) Consultation

The Draft Local Plan provides respondents with the opportunity to comment on proposed planning policies, site allocations, and the overall draft strategy and vision. The Draft Local Plan emphasises the importance of planning for the future of East Hampshire through responding to key issues such as the climate emergency, housing needs, supporting the local economy and protecting the environment. The published document also makes reference to minerals and waste planning.

**Draft Policy NBE13 ‘Protection of Natural Resources’** states that development proposals will be permitted if they ensure that the Local Plan Area’s natural resources remain safe, protected, and prudently used. Draft Policy NBE13(f) states that development proposals will be expected to demonstrate that they:

*“Do not sterilise mineral resources identified as of particular importance unless it can be demonstrated that it would not be practicable and environmentally feasible to extract the identified mineral resource prior to development taking place.”*

The consultation also publishes a draft Policies Map, however, at present this does not include the Mineral Safeguarding and Mineral Consultation Areas as designated in the adopted Hampshire Minerals and Waste Plan.

**Comments** – Tarmac support the policy provision for safeguarding mineral resources in Draft Policy NBE13(f) and it is important this is retained as the Local Plan is developed. However, the PPG clearly states that District Policy Maps should show adopted Mineral Safeguarding and Mineral Consultation Areas too (if adopted by the MPA). Identifying MSA and MCA on District Policies Maps provides clarity to developers and local communities on the presence of known resources and ancillary mineral infrastructure/facilities and ensures the MPA is consulted and that development is not granted which could prejudice a safeguarded mineral resource, site or associated mineral product related infrastructure.

**Draft Policy NBE1 ‘Development in the Countryside’** lists certain forms of development which could be acceptable in the countryside (the area outside of settlement boundaries). However, minerals development is not included in the criteria.

**Comments** – The NPPF confirms that minerals are a finite resource and can only be worked where they are found. Mineral sites are often located in rural areas outside defined settlement boundaries. To ensure Draft Policy NBE1 is consistent with Draft Policy NBE13 (and the Minerals and Waste Local Plan), it is considered a criteria should be added to NBE1 supporting minerals and waste development in the countryside, or make reference to the Hampshire Minerals and Waste Local Plan. This will remove any potential ambiguity over the interpretation of Draft Policy NBE1 with regard to minerals and waste.

#### Final Remarks and Conclusion

Tarmac is keen to engage with the preparation of the East Hampshire Local Plan and ensure that it is prepared in a manner consistent with national policy and the Hampshire Minerals and Waste Local Plan. The NPPF is unambiguous in placing great weight on the importance of extracting mineral resources and this is reflected in the adopted Minerals and Waste Local Plan.

Tarmac support the wording of Draft Policy NBE13 in relation to minerals, however, a similar criteria should also be included in Policy NBE1 to recognise that minerals development is appropriate in the countryside. Moreover, the emerging Policies Maps should show Mineral Safeguarding and Mineral Consultation Areas.

It is considered that the above amendments will ensure the new local plan is consistent with the NPPF and the adopted Minerals and Waste Local Plan. We would welcome opportunity to discuss the contents of this letter with you. Should you have any queries please do not hesitate to contact us.

Yours faithfully,

**Heatons**



**From:** [REDACTED]  
**Sent:** 04 March 2024 17:32  
**To:** [EHDC - Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Henry Adams LLP obo Trustees of Rowlands Castle Brickworks Trust  
- Regulation 18 LP Consultation - response obo Trustees of  
Rowlands Castle Brickworks Trust  
**Attachments:** [EHDC Local Plan Reg 18 - Feb 24.pdf](#)

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**Categories:** Consultation Responses

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

Good afternoon

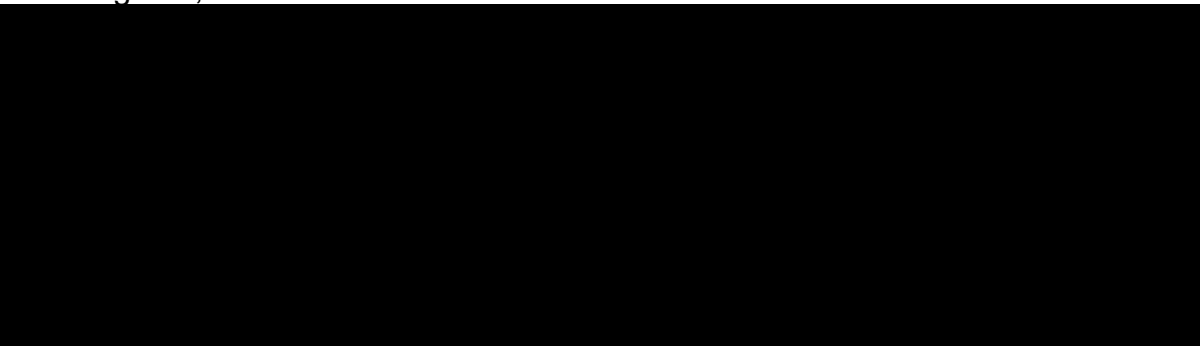
Please find attached representations on behalf of Trustees of Rowlands Castle Brickworks Trust.

The submissions relate to the following draft policies:

- Policy S1 – Spatial Strategy
- Policy S2 – Settlement Hierarchy
- Policy H1 – Housing Strategy
- Allocations:
  - RLC1
  - RLC2

I would be grateful if you could confirm safe receipt.

Kind regards,



Rowan House, Baffins Lane, Chichester, West Sussex PO19 1UA



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# East Hampshire District Council

## Regulation 18 Local Plan Consultation

Representation on behalf of  
Trustees of Rowlands Castle Brickworks Trust

Site: Land south-east of The Drift, Rowlands Castle

**February 2024**



Henry Adams LLP Rowan House, Baffins Lane, Chichester, West Sussex PO19 1UA  
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## **1 Introduction**

- 1.1 This representation provides a response to the Regulation 18 Consultation (January 2024) on behalf of the Trustees of Rowlands Castle Brickworks, who are in control of the land identified on the attached plan (**HA Appendix 1: Site Location Plan**, hereon referred to as the site).
- 1.2 This representation will provide written responses in relation to the spatial strategy and housing policies within the Regulation 18 Draft Local Plan (January 2024). The representation will then examine our clients site alongside some of the more site specific, allocation policies relating to Rowlands Castle.

## **2 Spatial Strategy & Housing Strategy**

### Policy S1 – Spatial Strategy

- 2.1 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.
- 2.2 The Technical Note published by Icenii 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.
- 2.3 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 S2 – Settlement Hierarchy

- 2.4 To achieve sustainable development the plan states that development will be distributed in accordance with the spatial strategy and settlement hierarchy as set out in policy S2, with a greater proportion of development in the more sustainable and accessible settlements. The East Hants District is disjointed in terms of its geography due to the position of the South Downs National Park Local Authority area which separates the District. The plan therefore categorises these into three distinct areas, the north, the north-east and the south.
- 2.5 Policy 2 states that the distribution of development will be shaped by the role and function of places, based on the hierarchy. This revised hierarchy is supported by the Background Paper on Revised Settlement Hierarchy (January 2024) which considered the hierarchy of sites in relation to their accessibility by the most sustainable modes of transport of walking and cycling, in order to tackle greenhouse gas emissions. Alton in the north of the district is designated as a Tier 1 settlement. Liphook and Whitehill & Bordon are both in the north-east of the district and are Tier 2 settlements, along with Horndean in the south of the district. Rowlands Castle is a Tier 3 settlement, along with Bentley, Clanfield, Four Marks, Grayshott, Headley, Holt Pound.
- 2.6 In the Settlement Hierarchy Background Paper, it was acknowledged that Rowlands Castle has a large resident population relative to its accessibility score, which reflects the promotion from a Tier 4 settlement to a Tier 3 settlement in policy S2. We consider this to be fully justified and supported as Rowlands Castle has good accessibility in terms of being within a 10 minute cycle or walk to daily facilities and services that serves key social functions as identified in the Background Paper. Rowlands Castle is also served by other sustainable modes of transport including a train station and multiple bus routes. Rowlands Castle is an attractive place to live with a central village green and good access to local facilities and within walking distance to the South Downs National Park, it is therefore likely to attract new residents to want to move into the area in the future.

### Policy H1 – Housing Strategy

- 2.7 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.
- 2.8 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 Icenii Background Paper.

- 2.9 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.
- 2.10 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).
- 2.11 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.

### **3 The Site**

- 3.1 The site is located to the south-east of Rowlands Castle, and comprises agricultural land and equestrian stabling. The site is currently accessed from The Drift and there is potential for pedestrian access from Bailey Road, the recently approved Bargate development to the north. It is approximately 20.01 acres (8.1hectares) and broadly rectangular in size.
- 3.2 Rowlands Castle has a number of pubs and shops, whilst there is also a mainline train station which provides direct links to Portsmouth and London Waterloo. The train station

is in suitable walking distance from the site via the Drift and the Bargate development. The A3 is approximately 3 miles to the North-West, which provides further links to Portsmouth and London.

- 3.3 The site benefits from good pedestrian and cycle connectivity to the facilities within Rowlands Castle and Rowlands Castle train station via the public bridleway located to the west of the site which travels through The Drift to the north of the site. The technical highways works undertaken in relation to our site shows that there is potential to provide further pedestrian and cycle links connectivity to Bailey Road to the north of our site. Given the sustainable location of our site and good pedestrian/cycle connectivity to facilities and the train station within Rowlands Castle, the site should be viewed as a strategic allocation for development that would allow for a sustainable expansion to the east of Rowlands Castle and much needed housing.
- 3.4 The site has defined landscape boundaries and is located within Flood Zone 1 (lowest flood risk). The majority of the site is flat and is predominately cleared of trees and woodland. The site is also situated outside of any Conservation Area, would not affect any heritage assets and is well contained by existing planting to all boundaries. There is woodland to the north of the site which is covered by a woodland TPO.
- 3.5 In our previous call for sites submission in March 2023, we summarised the Highways Technical Report prepared by i-Transport LLP in 2018 and the pre-application advice provided on highways matters by the Hampshire County Council. To summarise, the County Council were satisfied that there were no significant design issues to be addressed, a single stage approach was therefore recommended that combines phases 2 and 3 (i.e. design to accompany planning application). I-Transport confirmed that the majority of the comments in the County Council's response relate to detailed design considerations and are matters that can be addressed at the application stage.
- 3.6 An indicative masterplan sketch layout of the site is shown in **HA Appendix 2**. The masterplan sketch shows an indicative layout of built form in the north-western quadrant of the site, with an area of public open space to the south. It is anticipated that the site could accommodate up to 75 dwellings via the existing single point of access from The Drift. The north-eastern and south-eastern quadrants could be retained for on-site, biodiversity net-gain and landscaping. There is also a potential opportunity for a larger site allocation, to incorporate the land comprising Mays Coppice to the south (HELAA Ref: LAA/RC-003), through working cooperatively with the neighbouring landowner. Initial discussions have taken place with the neighbouring landowner, and further work could be undertaken if the Council is willing to lend support to this.
- 3.7 The importance of retaining the landscape character and locally important views are considered essential for any future development of the site and therefore some preliminary landscape advice has been sought. This is provided in further detail in our

call for sites submission (March 2023). A more detailed landscape visual assessment can be provided, were the development prospects of this site to be progressed.

- 3.8 In summary, it is considered that our client's land which it has been established is within a sustainable location, and is deliverable within the five year period, would have limited landscape constraints that could not be overcome. Any future development would be landscape led, incorporating a high quality design, appropriate scale, and considered layout with a comprehensive landscape scheme to avoid any harmful impacts on locally important views within as identified within the Rowlands Castle Draft NP. On this basis, the land can be considered as an appropriate site for a strategic development allocation which could provide increased housing delivery over the Local Plan period.

#### **4 Site Allocations in Rowland Castle**

- 4.1 The Draft Local Plan allocates 145 homes in Rowlands Castle over the plan period, with four site allocations for housing. The two Deerleap sites comprising allocations RLC1 (north Deerleap) for five houses and RLC2 (south Deerleap) for eight dwellings. These sites are both in the Rowlands Castle Conservation Area and allocation RLC2 is partly located within the Scheduled Ancient Monument comprising the Rowlands Castle. Both allocation sites RLC1 and RLC2 are within the setting of the Scheduled Ancient Monument.
- 4.2 The NPPF describes scheduled monuments as assets of the 'highest significance' and states that any harm to, or loss of, the significance (from its alteration, or destruction, or from development in its setting), should require clear and convincing justification. Given that one of the allocated sites would be within the Scheduled Monument and both sites would be fully within its setting, it is difficult to see how thirteen new dwellings in such close proximity to the heritage asset would not harm the significance of the Scheduled Monument.
- 4.3 It is also noted on aerial mapping that this area is heavily wooded and will require removal of trees which likely currently add to the setting and character of the Scheduled Monument and the former Castle grounds. There may also be issue regarding vehicular access to the site, particularly the northern parcel which is surrounded by high flint walling to the north which is a non-designated heritage asset in the Rowlands Castle Neighbourhood Plan. The northern Deerleap allocated will therefore be reliant on access being achieved to the south through the southern allocation at Deerleap. There could be logistical issues regarding this if both sites are pursued by different landowners/developers. It is somewhat surprising given the heavily constrained nature of the Deerleap sites, that they have been brought forward for allocation in the Draft Local Plan. It would seem more logical to pick a less constrained site on a sustainable, edge of the settlement boundary location, where higher housing numbers could be achieved without concern that it would harm the significance of an important Scheduled Ancient Monument in Rowland Castle.



**5 Conclusion**

- 5.1 It can be concluded, based on the Council's background evidence, and ONS data that further potential population rise may require an increased need for housing in East Hants than is currently set out in the draft Local Plan. 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.
- 5.2 There are also 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.
- 5.3 There are also concerns that some of the site allocations for housing within Rowlands Castle could affect the significance of important heritage assets within the village which would conflict with national planning policy and affect their deliverability. A better approach would be to allocate housing on a less constrained site on a sustainable, edge of the settlement boundary location, where higher housing numbers could be achieved without concern that it would harm the significance of an important Scheduled Ancient Monument in Rowland Castle. Our client's site, which is unconstrained and situated adjacent to the settlement boundary, within a sustainable location, would be ideally suited to provide this.

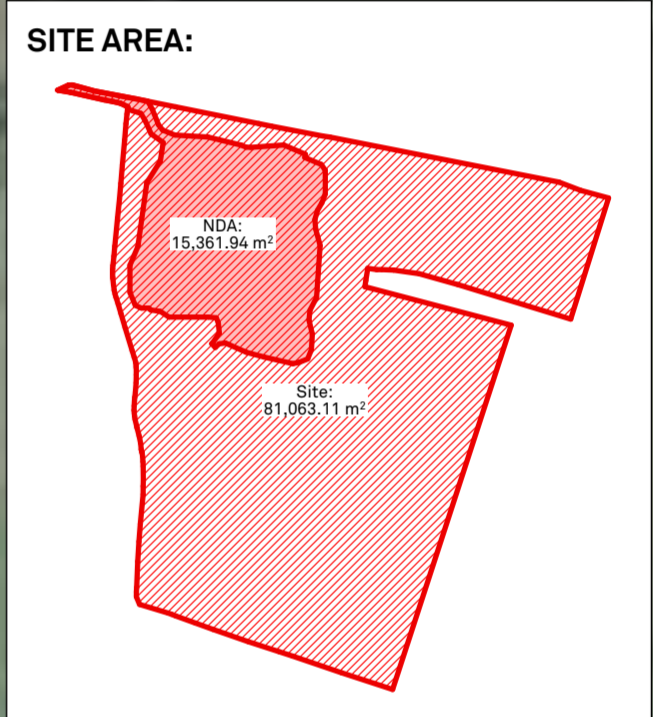
## HA Appendix 1 - Site Location Plan



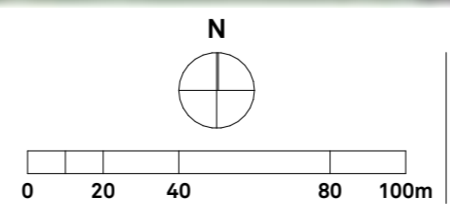
**HA Appendix 2 - Indicative Masterplan Sketch Layout**



- LEGEND**
- Site boundary
  - Adjacent Forest Gate development (Bargate Homes)
  - Potential connections to existing PRoW
  - 1 Proposed site access (existing track to be configured, subject to highways input)
  - 2 Primary tree-lined access road
  - 3 Public open space (P.O.S.)
  - 4 Potential location of SuDS features (subject to site levels / detailed drainage design)
  - 5 New openings in existing hedgerow to provide access to P.O.S.
  - 6 Existing service strip / access to adjacent ecology receptor site to be retained
  - 7 Existing ecology receptor site for recent Forest Gate development
  - 8 Existing agricultural buildings
  - 9 Existing agricultural fields



rev.	date	changes description	status	issued by
P01	30/03/2023	First Issue	S2	DM



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**DM**  
date created  
**Mar 2023**  
checked by  
**MS**  
scale at A2  
**1:2000**

project title  
**Land East of The Drift, Rowlands Castle**  
document title  
**Concept Layout**

project	originator	volume	level	type	role	number
<b>F23028</b>	<b>RFT</b>	<b>ZZ</b>	<b>XX</b>	<b>DR</b>	<b>A</b>	<b>0500</b>
status	suitability description	revision				
<b>S2</b>	<b>For Information</b>	<b>P01</b>				

**From:** [REDACTED]  
**Sent:** 08 March 2024 15:38  
**To:** [EHDC - Local Plan](#)  
**Subject:** [REDACTED] Land at Applegarth  
**Attachments:** [Applegarth Farm.pdf](#)

---

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Consultation Responses

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

Good afternoon

Please find attached representations on behalf of the [REDACTED]

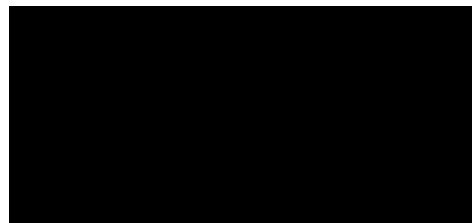
The submissions relate to the following draft policies:

- o NBE11 – Gaps between settlements

I would be grateful if you could confirm safe receipt.

Kind regards,

Chris



Rowan House, Baffins Lane, Chichester, West Sussex, PO19 1UA





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# East Hants District Council

## Regulation 18 Local Plan Consultation

Representations on behalf of



Land at Applegarth Farm, Grayshott

March 2024



## **1 Introduction**

Henry Adams LLP act on behalf of the [REDACTED] and Land at Applegarth Farm, Grayshott. For clarity, the land is identified in Appendix 1 of these representations.

The following representations seek to make comments on the approach to Local Gaps and other relevant policies that are of interest to our client and relevant to their landholdings. In addition, we wish to continue to ensure East Hants are aware of our client's land being available for development.

## **2 Policy NBE11**

The East Hants Draft Local Plan Regulation 18 document sets out a number of policies and is accompanied by policy maps for each settlement. One policy is Policy NBE11, Gaps Between Settlements. The policy sets out the following wording:

*NBE11.1 - New development in the countryside must avoid reducing the open land that contributes to the form and character of existing settlements and maintains their separate identities.*

*NBE11.2 Planning permission will be grant for development which maintains the open character and appearance of the countryside between settlements and individual identity of towns and villages.*

Our client's land is proposed to be located in a gap, Headley Down / Grayshott and these representations wish to make clear why we do not consider the gap to be drawn correctly or considered in full and suggest that the policy map be amended so that the gap is removed completely or our client's land is excluded.

In supporting the proposed gaps between settlements, a background paper has been published as part of the Local Plan evidence base. This paper is called the Gaps between Settlements Background Paper. This paper sets out 9 criteria that a gap must meet to be considered a gap.

We set out the criteria below, and explain why we believe in this case that our client's land does not meet the criteria of the gap.

- |    |                             |  |
|----|-----------------------------|--|
| a) | <i>Open and undeveloped</i> | <i>A gap should generally be open and have an undeveloped nature. Ideally there should be an absence of existing urban activity but this will not realistically be achievable.</i> |
|----|-----------------------------|--|

Specifically with regards to our client's land, it is well enclosed from the wider countryside, with Hammer Lane being a defined boundary on its western edge. There is a heavy tree belt on the southern boundary which adjoins Headly Road, with a further belt along with northern boundary. There is a public footpath that runs along the northern boundary of the site, which would be used by residents of the adjoining Tennyson Way scheme, again reducing the 'undeveloped' nature of the site due to the use of the footpath. In addition, our client's land is a driving range, with associated buildings, as such could be considered previously developed land.



With regards to the wider gap to the west, our client sits on the furthest east boundary. Looking at the land to the west in the gap, this is developed with a number of residential and gypsy/traveller plots and it is difficult to see how the gap can be seen as undeveloped.

East Hants have considered our client's land to be developable in the Land Availability Assessment (LAA) for approximately 45 dwellings. As such, at high level, the Local Authority feel that this could be an appropriate location for development and placing the land in the gap reduces these prospects.

- b) *Sufficient separation between settlements*      *A gap should provide a sense of arriving/leaving a place, a feeling of separation, the identity of which would be lost by coalescence.*

The land offers no arrival to the settlement of Grayshott as it is set back from the Headley Road and is not viewable by passing traffic due to the heavy tree belt.

- c) *Aligning to a recognised feature*      *The boundary of a gap should consider the existing vegetation and land uses (gardens, footpaths, hedgerows, streams, field boundaries, woodlands and backs of houses). These act as a robust edge to a gap (act as visual screen to housing). However, in many cases the boundaries should, where possible, align to the Settlement Policy Boundaries (SPB).*

Hammer Land to the west of the site is the logical location for the gap to end if it is continued to be included in the Local Plan. The land to the west of the site, Tennyson Way is not included in the Settlement Policy Boundary and the aim of the gap is to protect gaps between identified boundaries.

- d) *Ecological values*      *A gap should not necessarily include nature conservation recognition (eg. SSSIs, SPAs) as these are adequately protected.*

The land is not designated as any specific ecological values.

- e) *Nature of settlement edges*      *The boundary of a gap should integrate with the adjacent countryside.*

The gap does not follow any specific field boundaries and seems to primarily include development to the north of Headley Road. As mentioned much of the gap is residential or gypsy/traveller use not countryside.

- f) *Alignment with revised settlement policy boundaries*      *In most instances the boundary of a gap will adjoin the SPB*

The gap does not adjoin a Settlement Policy Boundary on its western boundary.

- g) *Planning completions*                      *The boundary of a gap should be aligned against the developments that were not completed during the Second Review Local Plan and Housing & Employment Allocations Plan.*

There are no adjoining allocations to our client's land. However East Hants permitted the expansion of our clients retained land at Applegarth Farm for the expansion of the existing restaurant and farm shop in 2022 under ref. 27202/038. This was within a designated gap between settlements.

In addition, the land to the immediate west was granted planning permission for 80 dwellings at a time that the Local Plan did not have a policy map showing gaps between settlements. It is however now shown in a gap between settlements and has been amended in this consultation to be remove the land, but not include it in the Settlement Policy Boundary.

Both of these applications point towards the gap between settlements not performing their required role and are sustainable locations.

- h) *Planning permissions*                      *The boundary of a gap should be aligned against the developments with recent permissions.*

The recent planning permissions demonstrate that the land and surrounding land does not contribute towards the gap.

- i) *Allocations/ Proposed sites*                      *The boundary of a gap should be aligned against the proposed sites in the new Local Plan and those contained within the 'made' Neighbourhood Plans*

Within the gap is a proposed travelling showpeople allocation for 6 plots. We find it difficult to understand how East Hants can argue that the list forms part of the gap between settlements and that it is 'undeveloped' and meets criteria a) of the background paper when they are allocating land for development. The location and boundaries of the gap between Headley Down / Grayshott should be reviewed in its entirety to ensure that it is appropriate and not to restrict development on sites that are potentially developable, as even identified by East Hants.

### **3 Land availability**

Henry Adams have submitted the land on behalf of the [REDACTED] initially in 2018 in the Call for Sites and then at every opportunity since then to ensure that East Hants are aware of its availability for development. We wish to continue to make East Hants aware that the land is available for development, should more housing be required in the District.

The land adjoins a development of 80 dwellings, ref.27202/031 and subsequent Reserved Matters ref.27202/033. Access to the site can be achieved through this residential development and multiple access points have been left available for this. The site the subject of this submission would be a logical extension to the settlement Policy Boundary.

The landowners have been able to work with East Hampshire to provide residential development on other landholdings and as a result, are keen to engage with Local Authority to review any concerns the Council may have and work together to deliver a high quality and sustainable development at this site

East Hants have concluded that the land is suitable for development for 45 units in the LAA, under ref LAA/GRY-004 within the timescale of 0-5 years. The site is relatively unconstrained, other than the proposed gap between settlements and as such it is felt that site should be removed from the gap in case it is required for development in the future.

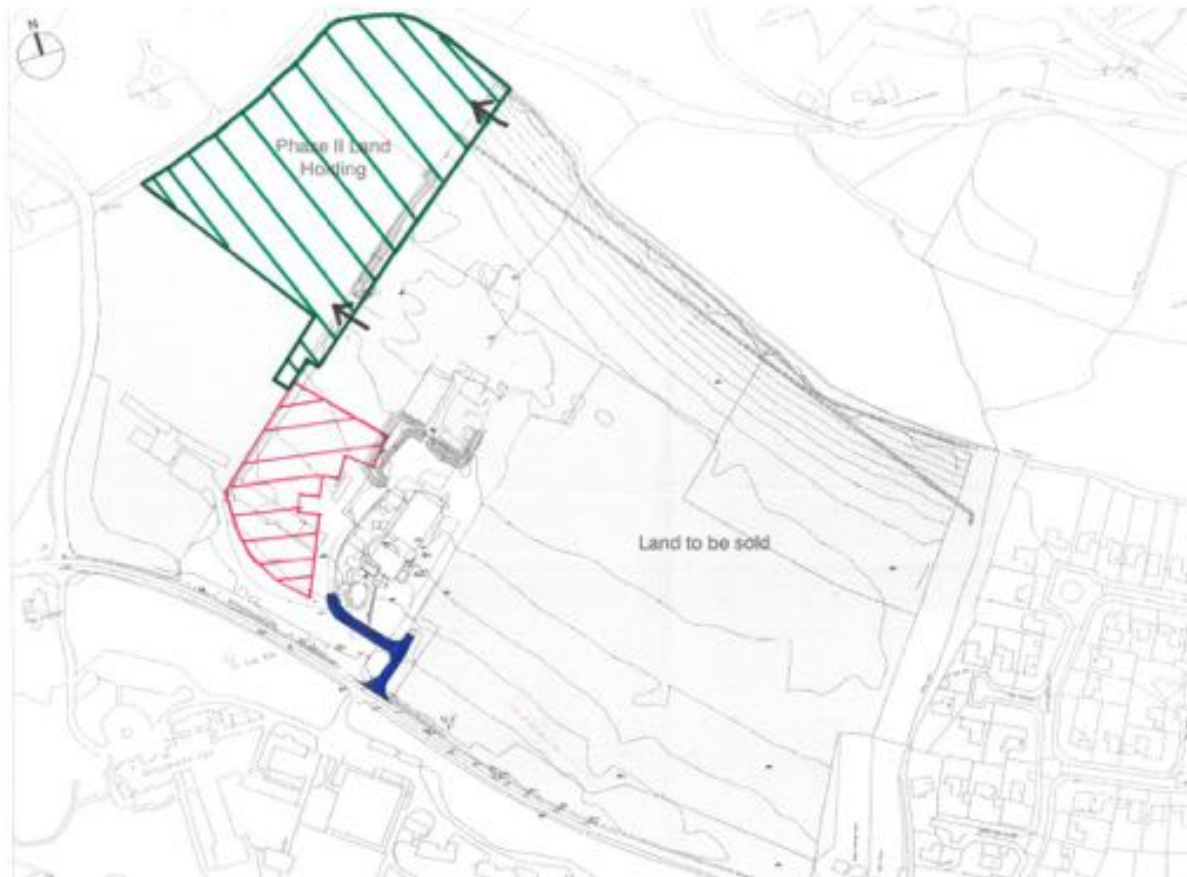
#### **4 Conclusion**

For the reasons set out above in these representations, it is our view that the gap between Headley Down and Grayshott is not suitable and should be removed or reconsidered to remove our client's land that is outlined in red on appendix 1. We would request that the policy map is amended to remove the land hashed black and marked with 'remove' on appendix 2.

The land does not contribute to the gap or meet the 9 criteria set out in the accompanying background paper, and has been considered as potentially being suitable for development in the LAA. We would be concerned that the proposed gap has been put in place to hinder the land coming forward for development, in the location that has been deemed as sustainable considering the surrounding planning permissions and proposed allocations.

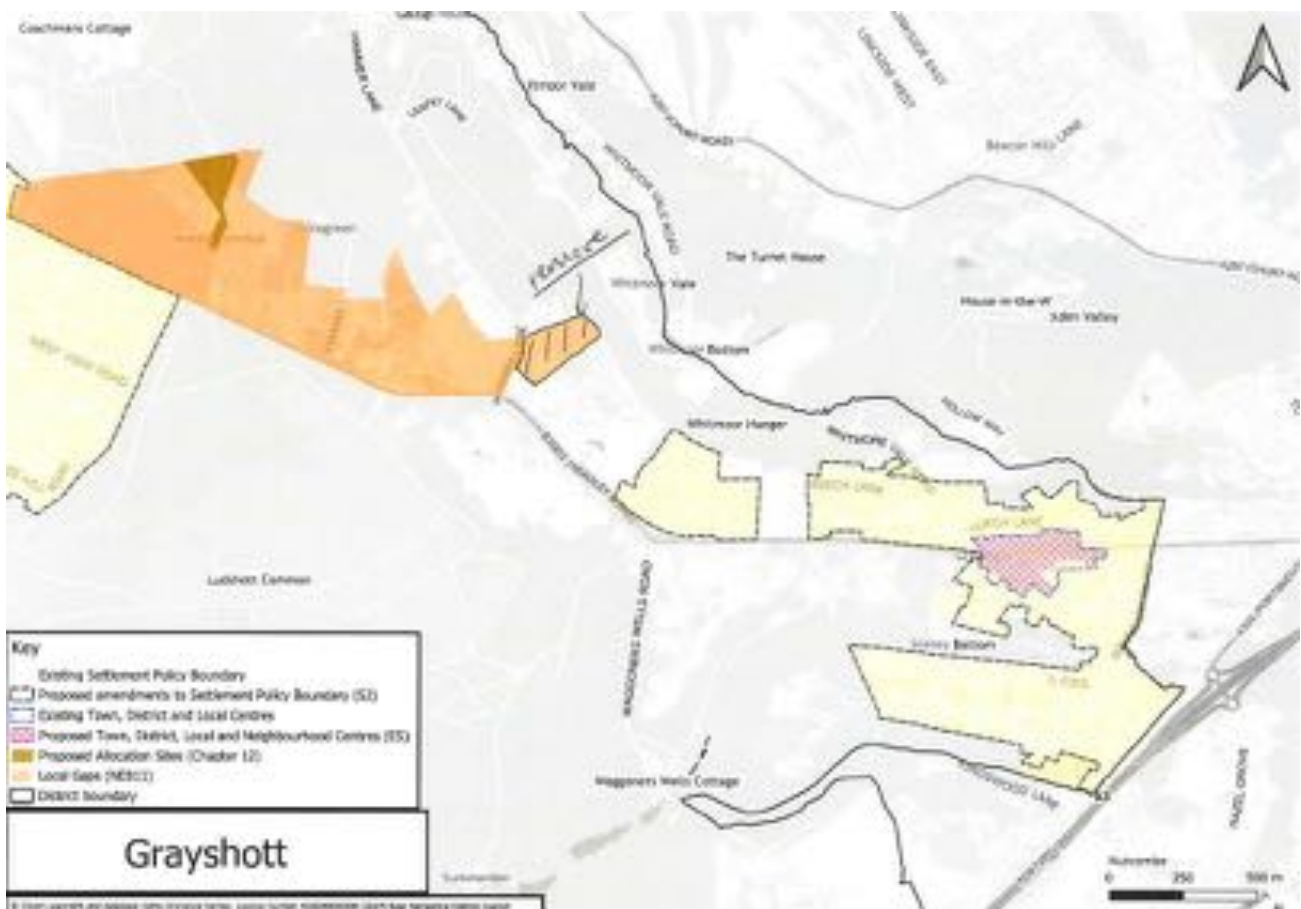
**Appendix 1**

**Land available coloured red and green**



Appendix 2

Land proposed to be removed from the gap





**From:** [REDACTED]  
**Sent:** 07 March 2024 17:07  
**To:** [EHDC - Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Henry Adams obo PNH Properties - Regulation 18 LP Consultation - response obo PNH Properties, Passfield Business Centre, Lynchborough Road, Passfield  
**Attachments:** [EHDC Local Plan Reg 18 - Feb 24 FINAL.pdf](#)

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

**Categories:** Consultation Responses

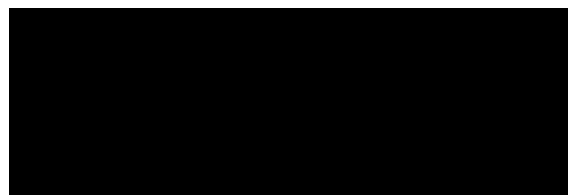
**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

Good afternoon,  
Please find attached representations on behalf of PNH Properties.  
The submission relates to the following draft policies and matters:

- Policy S1 – Spatial Strategy
- Policy E1 – Planning for Economic Development
- Settlement Boundary
- Employment Land Allocations

I would be grateful if you could confirm safe receipt.  
Kind regards,

[REDACTED]



Rowan House, Baffins Lane, Chichester, West Sussex, PO19 1UA



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# East Hampshire District Council

## Regulation 18 Local Plan Consultation

Representation on behalf of  
PNH Properties

Site: Passfield Business Centre, Lynchborough Road, Passfield

**February 2024**



Henry Adams LLP Rowan House, Baffins Lane, Chichester, West Sussex PO19 1UA  
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## **1 Introduction**

- 1.1 This representation provides a response to the Regulation 18 Consultation (January 2024) on behalf of PNH Properties, who are in control of the land identified on the **HA Appendix 1: Site Location Plan**, hereon referred to as the site.
- 1.2 This representation will provide written responses in relation to the spatial strategy, economic and settlement boundary policies within the Regulation 18 Draft Local Plan (January 2024). The representation will highlight the benefits that an intensified or expanded employment use on our client's site could provide for the District in the future.

## **2 Spatial Strategy & Economic Strategy**

- 2.1 Policy S1 of the Plan sets out the spatial strategy for the District, advising that 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. To achieve sustainable growth the Council will ensure that development is distributed in accordance with the spatial strategy and settlement hierarchy policies of the Plan.
- 2.2 Policy E1 of the Plan states that proposals for new development and redevelopment of existing buildings and premises for employment uses will be supported within strategic and local employment sites within settlement boundaries. Within the countryside, proposals will be required to demonstrate a need for development at that location and compliance with other plan policies.
- 2.3 We support the principle of redevelopment and expansion of existing employment sites within the District, as these are established sites on brownfield land that can often accommodate intensification of employment uses or redevelopment.

## **3 The Site**

- 3.1 Our client's site is located on the south-western edge of Passfield, a small village in East Hampshire district which lies approximately 2.6km north west of Liphook, 3.2km south east of Bordon and 23km south east of Guildford. The site extends to 2.5 Hectares. The site is bounded by Lynchborough road on one side to the south-east and mature existing trees to the remaining three sides.

- 3.2 The site comprises Passfield Business Centre, which contains a mixture of office, light industrial and storage uses. The site is classified as a local employment site within the plan which is mostly within the settlement boundary of Passfield Common. The site is located in the north-eastern area of the District, largely within the settlement boundary of Passfield Common (tier 5 settlement) with the next closest settlement being Whitehall and Bordon (Tier 2 settlement). The site is within 400m of Woolmer Forest SSSI and Walden Heaths Phase II SPA and a deciduous woodland Priority Habitat.
- 3.3 The East Hampshire Employment Land Review Update 2023 recommended safeguarding our client's site as a local employment site within the Local Plan Review. The site is considered to be a rural employment site within the Review Update, yet is predominantly located within the settlement boundary. In our view this should be reviewed, with the settlement boundary extended to include the entire Passfield Business Centre site as identified on **HA Appendix 1: Site Location Plan**. This is discussed in further detail in the next section.

#### **4 Comments on Local Plan Policies**

##### ***Settlement Boundary***

- 4.1 The Interim Settlement Policy Boundary Review Background Paper (January 2024) seeks to amend the boundary of Passfield with notable changes being to extend the boundary to accommodate residential gardens. Representations were previously made to the Council through the previous Regulation 18 Consultation, specifically noting that the entirety of the site benefits from consent for employment use and thus the entirety of the site should be included within the Settlement Boundary as shown on the plan within **HA Appendix 1: Site Location Plan** and approved under the planning permission (Ref- 21479/005). This 1985 planning permission approved the use of the site for offices, hi-tech, light industrial and warehouse uses. This settlement boundary should therefore be extended to the south and west of the current settlement boundary line for Passfield. Local Plan Appendix A: Reg 18 consultation responses notes our clients representations. These representations specifically stated that the curtilage should not be subdivided. The Council's response is as follows:

*'Comments noted. It is considered the curtilage relates more to the character of the countryside than the built form. It is agreed that the current SPB does not follow a defined boundary, therefore an amendment will be made to follow the extent of the built form.'*

- 4.2 However, the boundary has not been redrawn to reflect these comments. We would therefore request that settlement boundary be amended to include the entire extent of Passfield Business Park as per the planning unit shown in the 1985 planning permission and in **HA Appendix 1: Site Location Plan**.

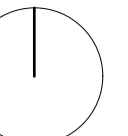
***Employments Needs for the District***

- 4.3 The Housing & Employment Development Needs Assessment (HEDNA) published by Icenl (May 2022), identifies that 28.2 ha of employment land required in plan period as set in HEDNA. To ensure there is sufficient employment land in line with the 28.2 ha of employment land identified in the HEDNA, the Draft Local Plan seeks to make provision through intensification of existing strategic employment zones & local employment sites, current employment land commitments and some additional allocations. We would express our support for intensification and expansion of existing strategic and local employment sites within the District, as this is the most sustainable method to provide employment development within the District.
- 4.4 The allocations policies within the Plan focuses sites for additional employment development in Alton and Whitehill & Bordon. Whilst policies S1 and E1 generally support the intensification of existing strategic employment zones & local employment sites within the District, we feel that that policies within the Plan should provide greater emphasis on expanding existing local employment sites throughout the District, where this is feasible. This could be achieved by further site allocations for existing local employment sites where there is the capability to expand or intensify existing local employment sites. Expansion and intensification of smaller local employment sites, such as our client's site can provide a beneficial source of local employment to communities in the surrounding villages, which can avoid the need to travel to the larger urban settlements.
- 4.5 The HEDNA states that for industrial land, the employment trends data points to a need for between 66,000 – 97,000 sq.m of industrial floorspace requiring up to 24.3 ha of employment land. The Assessment also highlights the recent supply constraints for industrial land within the District and that there is a case for flexibility to support stronger economic performance (having regard to the growth in labour supply), the upper end of the range provides a reasonable assessment of future needs (24.3 ha). This data from the HEDNA indicates a need for polies in the plan to provide increased flexibility to allow for provision of industrial uses. Allocating more sites for employment uses, and in particular industrial uses as identified, would provide for the increased need for these uses in the District over the plan period.

## 5 Conclusion

- 5.1 In conclusion, we support the principle of the Draft Local Plan's spatial and economic policies, S1 and E1, which enable the intensification and expansion of existing strategic and local employment sites within the District. These brownfield sites are the most suited to meet the demand for future employment floorspace within the District due to their sustainable locations.
  
- 5.2 We would recommend that the settlement boundary for Passfield be withdrawn to include the entire Passfield Business Centre site as approved under planning permission (Ref-21479/005) and shown in **HA Appendix 1: Site Location Plan**. We would also recommend that further site allocation policies for employment land through expansion and intensification of existing local employment sites are incorporated within the Local Plan. This would bring the benefit of greater clarity through site allocation policies of which existing employment sites are suitable for expansion and/or intensification, whilst providing an increased level of employment floorspace over the plan period.

**HA Appendix 1 - Site Location Plan**



**NOTES:**

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 Drawing to be read with all relevant Architectural, Interiors, Structural, M&E, Drainage/Public Health, Landscape, Civils and Interiors drawings and specifications. Any discrepancies between consultant's drawings to be reported to the Architect before any work commences.  
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--- Site Boundary



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**PROJECT**

Lynchborough Road, Passfield

**DRAWING TITLE**

Site Plan  
Existing Block Plan

REV	DATE	NOTES

<b>DRAWN BY</b>	<b>CHECKED BY</b>
-	-

<b>JOB NO.</b>	<b>STATUS</b>
267	Planning Submission

<b>DRAWING NO.</b>	<b>REV</b>
267_PLN_010	-



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

4<sup>th</sup> March 2024

Dear Sir/Madam,

**Highwood Response to East Hampshire District Local Plan 2021-2040 Regulation 18 Consultation**

Thank you for providing Highwood with the opportunity to make comment on the Regulation 18 draft of the Local Plan. These representations are made in the context of Highwood having interest in land at several locations in the district:

- Land south and east of Blendworth Lane, Horndean: LAA/HD-031
- 187 Catherington Lane, Horndean: LAA/HD-022

The above sites have been assessed as 'developable' within the most recently published Land Availability Assessment (LAA) 2022.

Additionally, we have recently acquired an interest in the following site not yet submitted to the Council for consideration:

- Land east of Lindford Road, Lindford for care home use.

Highwood are also promoting the development of 82 dwellings on land north of Rowlands Castle Road, Horndean, (part of the wider Land East of Horndean community as allocated in the existing local plan, under Policy HE1), which at the time of writing, is currently subject to an ongoing planning application ref. 55562/013.

The following comments are designed to help strengthen the policies within the draft local plan to enable the Council to progress towards Regulation 19 with a plan that is legally compliant and sound, consistent with national policy and guidance.

**The Plan Period (page 20, para 1.13 onwards)**

The local plan (and associated LDS) has a very optimistic projected adoption date of 2025, with an end date for the plan period up to 2040. Paragraph 22 of the National Planning Policy Framework (NPPF) requires strategic policies to look ahead over a minimum 15-year period from adoption and 2040 was presumably chosen as being 15 years after the anticipated adoption date for the plan.

Considering the prolonged duration of time it has taken the council to reach this current stage of plan formulation (it began the process six years ago, consulted on other Reg.18 versions of the plan in 2019 and in 2023), and given the very optimistic anticipated adoption date of 2025, it would surely be prudent and more robust an approach to extend the plan's timeframe as a precautionary principle to ensure that paragraph 22 of the NPPF is complied with.

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Highwood Homes Limited Registered No: 10417301  
Highwood Residential Limited Registered No: 05824608





Our suggestion is that the plan's timescale be extended by an additional two years, concluding in 2042.

Strategic policies (including housing supply policies) need to be reviewed accordingly - the housing requirement will need to be recalculated and additional housing allocations set out within the Local Plan to meet the need arising from an extended two-year period.

This is a fundamental matter and therefore important to consider at this stage (rather than later which could lead to further delays ahead of adoption) to ensure sufficient homes are planned for in the next Reg. 19 stage of the plan sufficient to provide for a minimum 15-year period from adoption.

### **The Vision (page 25, para 2.4)**

The vision states,

*“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.”*

In accord with our comments on the length of the plan set out above, the vision should be amended to reference 2042 and instead of 'and beyond' a longer-term vision that looks further ahead, i.e. 30 years as required by paragraph 22 of the NPPF should be more explicitly referenced.

It is imperative that the housing crisis is given priority through the provision of the right amount and type of housing to meet the growing affordable, market and specialist housing needs of the district.

It is welcomed that the vision has been amended from the previous version consulted upon in 2023 to include reference to 'affordable' as well as 'quality homes'. However, crucially, the vision doesn't reference making sufficient provision for housing overall, which should be prominent in any vision for the plan. The 2019 Reg. 18 draft plan contained a vision that referred to needs in this way. So, whilst affordable is now referenced, other types of housing – i.e. an aspiration to meet needs of all residents could also be included – e.g. to meet the needs of all residents such as retirement living and accommodation for the elderly and other groups.

This would be more consistent with key theme of national policy set out in the NPPF to making sufficient provision for housing needs (paragraph 20a) and significantly boosting the supply of homes and that the needs of groups with specific housing requirements are addressed (paragraphs 60 and 63). This is a matter of significant importance in East Hampshire in particular, where the costs of new homes are high and affordable housing needs acute.

The vision as drafted does not give this important, key objective to provide enough housing for its residents sufficient prominence.

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Highwood Construction Limited Registered No: 05080117  
Highwood Homes Limited Registered No: 10417301  
Highwood Residential Limited Registered No: 05824608



An alternative wording could be,

*“By 2042 and beyond, our residents will live in healthy, accessible and inclusive communities, where sufficient numbers of quality homes, including affordable homes, will be provided to meet the needs of all our residents. Local facilities and employment opportunities will be delivered in sustainable locations that will provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.”*

### **Objectives (page 26 duplicated page 31)**

Objective A (in A1) mentions the objective of meeting the housing needs of all and specifically affordability and meeting the needs of an ageing population. Reference is also made to provision for gypsies, travellers and show people.

Objective A should be amended to more explicitly reflect the wording of the NPPF in paragraph 60, but more importantly, paragraph 63 in setting out clearly as an objective meeting the needs of all groups, not just those referenced in the text currently. I.e. paragraph 63 of the NPPF states,

*“These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.”*

This would be consistent with supporting text contained within paragraph 3.4 on page 32 of the plan.

## **Housing**

### **Paragraph 3.6-3.7, page 32 – Timescale and Housing Requirement**

Reflecting our comments made above on timescale, the outputs of the standard method should be updated and the minimum number of homes to be provided uplifted to reflect a later end to the plan period to ensure 15 years from date of adoption consistent with paragraph 22 of the NPPF.

### **Paragraphs 3.10-3.12, page 33 – Unmet Needs and Housing Requirement**

Whilst it is welcomed that reference is made in para 3.10 to the PfSH Spatial Position Statement of December 2023 and mention of the approximate 12,000 shortfall in homes to 2036 across the sub-region, it is not acceptable that EHDC as part of PfSH does not seek to make a contribution towards making up that shortfall – particularly in the south of the district – irrespective of whether or not it has an identified ‘Broad area of Search for Growth’. This risks the plan being found not legally compliant in terms of not fulfilling the duty to co-operate, but is also potentially an unsound approach to housing supply.

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It is notable in this regard that Test Valley borough are also currently consulting on a draft local plan that doesn't make any provision towards meeting the identified shortfall (and that is an area which does include a 'Broad area of Search for Growth'). If every authority in PFSH takes this approach, the shortfall will never be addressed.

Ahead of Reg. 19, the council should therefore review whether any contribution can be made to unmet need arising from PFSH area and allocate additional sites accordingly in the southern parish settlements of Horndean, Clanfield and Rowlands Castle.

This is an issue that has overlap with our comments above on the timescale for the Plan and there being no longer-term vision (30-years) in the plan as required by paragraph 22 of the NPPF.

### **Policy S1**

Taking our comments above into account, notwithstanding any consideration of unmet needs, an extended plan period of an additional two years to 2042 at 478 homes per annum would be an uplift in homes needed by **956 to 10,038**.

The figure should be treated as a minimum to be exceeded where possible in order to significantly boost the supply of homes and the acute affordability issues affecting the area and this should be set out more clearly in the policy and supporting text.

It is considered that considerably greater numbers of housing allocation should be planned for in the emerging Local Plan. This will help address issues of delivery, with the Council currently unable to demonstrate a 5year housing land supply. Any unmet need from neighbouring authorities should be properly quantified, identified and included in the housing requirement so that a contribution can be made towards addressing such undersupply.

The needs of accommodation for older people should be quantified and identified within Policy S1 in accordance with our comments below in the same way as is currently done for general housing and for Gypsies and Travellers.

### **Policy S2 and Policies Map (Horndean) – Settlement Policy Boundary**

There is a proposed change to the SPB associated with the existing local plan allocation for the new community at Land East of Horndean (Policy HE1) – in the part of the allocation located north of Rowlands Castle Road, to the north east of Letcombe Place. See extract below.

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The site is currently subject to an ongoing planning application ref. 55562/13 for 82 dwellings and is a sustainable location for development that has been subject to a previous outline planning permission. The proposed change to the SPB is not consistent with the findings of the Interim SPB Review Background Paper 2024 and given outline permission 55562/001 is no longer extant, it makes no logical sense to change the SPB to reflect the parameters of what is now a lapsed permission.

Suggestion – keep the SPB in this sustainable location as existing in accord with adopted local plan policy HE1 as below.



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## Part B – Greener Places

Highwood supports sustainable construction principles and the climate emergency must be addressed and responded to and we have some sympathy with the Council seeking to do so at a local level.

However, we question (as the council does on page 48), whether in light of the 13<sup>th</sup> December 2023 Ministerial Statement, recent court cases and with national development management policies likely to be implemented in the coming months, the local plan is the best way of addressing issues such as those set out in CLIM1 to CLIM5. The Building Regulations system is far better positioned as the legislative system to manage these issues, which primarily are construction issues rather than the planning system (except where there are layout, orientation or design aspects to consider).

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 homes.

## Older Persons Housing and Care

Over the years, Highwood has built a portfolio of retirement living, care home and care village developments for some of the UK's leading care operators and healthcare providers, including most recently within East Hampshire district at Horndean and in Alton. We are concerned given the startling projections in relation to the growing section of the population that will be over the age of 65 by the end of the plan period that not enough is set out currently within the draft plan to identify how the needs of this growing proportion of the population are to be met.

## Supporting text to Policy H5 at 9.71

This currently states,

*“The Local Planning Authority has an obligation to ensure that the housing needs for all people are considered and provided for wherever possible.”*

This does not properly reflect the wording of the NPPF and PPG and should be amended to more fully reflect the critical nature of the issue as set out in national policy and guidance (see below).

## Policy H5 – Specialist Housing

The age structure of the district is older than other areas both regionally and nationally. The Council's updated Housing and Economic Development Needs Assessment (HEDNA, 2022) Table 6.10 and the draft plan at Fig 9.3 identifies that the district is projected to see a notable increase in the population aged 65 and over up from 2021 to 2038 by 10,914 (36.6%). This trend is clearly going to continue to the end of the anticipated plan period and beyond.

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Table 6.10 Population change 2021 to 2038 by broad age bands – East Hampshire (2018-based SNPP – alternative internal migration assumptions)

	2021	2038	Change in population	% change from 2021
Under 16	21,912	20,834	-1,078	-4.9%
16-64	70,880	68,039	-2,840	-4.0%
65 and over	29,836	40,751	10,914	36.6%
Total	122,628	129,624	6,996	5.7%

Source: ONS

*“Given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward” (HEDNA 2022 para 8.25).*

It is good that the HEDNA acknowledges this, but given the above figures in Table 6.10, with the proportion of the population over 65 rising from circa 24.3% of the population to circa 31.4%, the full range and type of accommodation for older people (see para 63 of the NPPF but also the different types as set out in Paragraph: 010 Reference ID: 63-010-20190626 of PPG) needs to be properly planned for.

Paragraph 63 of the NPPF states:

*“63. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include ... older people (including those who require retirement housing, housing with care and care homes).”*

PPG (Paragraph: 001 Reference ID: 63-001-20190626) states that,

*“The need to provide housing for older people is critical”.* The use of the word critical is rare in planning guidance and highlights the importance of this issue and a presence of urgency.

Paragraph: 013 Reference ID: 63-013-20190626) states,

*“It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing....”*

In the case of East Hampshire, there is clearly an identified unmet need.

The HEDNA 2022 identifies that by 2038 there is an estimated need for 1,597 additional dwellings with support or care across East Hampshire, with a need for 331 additional nursing and residential care bedspaces identified. In total, a need of approximately 1,781 units over the period 2021-2038, equating to some 17% of all homes will need to be some form of specialist accommodation for older people.

Not enough is being done to secure the supply and delivery of specialist accommodation to plan for and meet identified needs in the plan as currently drafted.



There are currently no allocated sites for care or other specialist accommodation for older people for example. Policy H5 does not amount to a 'plan' for meeting the identified needs of older people. Too much is being left to the vagaries of the market and development management policies.

We do not have confidence that the Plan will deliver the specialised accommodation needed and this is important because a more sophisticated mix of different types of accommodation benefits all sectors of the community by helping to reduce costs to the social care/health systems (PPG Paragraph: 001 Reference ID: 63-001-20190626), freeing up housing, particularly underoccupied family housing and not competing for smaller units mainly aimed at first time buyers/younger people when older people are seeking to downsize.

There are no proposed allocations that will provide for the unmet need identified. There is no possibility in our view that enough fragmented smaller sites will come forward to meet the identified unmet need and allocations should be provided in this case, in accord with PPG Paragraph 013.

Highwood sites at Catherington Lane in Horndean and Lindford Road in Lindford are sustainably located, suitable, available and deliverable sites and could make significant contributions towards meeting local need and district need for specialist care accommodation (class C2) in these locations. We will be writing to the council in the coming weeks with further information on these sites to assist with the council's local plan evidence base.

#### **Policy NBE7 and para 5.5**

At the time of writing, the sequential test applies to all sources of flooding, including surface water flood risk and this will need to apply to all of the Council's proposed allocations as well as to future planning applications under NBE7.1. To ensure the plan is sound at Reg.19, all current proposed allocations should be reviewed for the presence of any surface water flood risk (not just those in Flood Zones 2 and 3) using EA flood mapping/SFRA and discounted from being allocations in the next iteration of the plan where there are reasonably suitable alternatives.

#### **NBE8.4 – 95 litres per person per day**

There is no justification for a requirement beyond building regulations for 110l per person per day. Building regulations is the legislative system best placed to deal with this issue, not the planning system.

#### **HWC1.2 – Health Impact Assessment**

We question why there is to be a requirement for a Health Impact Assessment in planning applications and the basis for this in national policy or guidance.

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## Conclusions

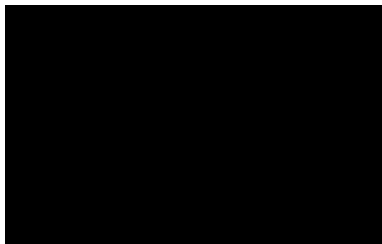
Given the representations set out above, there are three sites being promoted by Highwood in sustainable locations which if allocated could make a meaningful contribution towards meeting the identified needs for housing and (in the case of sites 2. and 3) provision of specialist forms of care accommodation for the elderly:

1. Land south and east of Blendworth Lane, Horndean: LAA/HD-031 for housing
2. 187 Catherington Lane, Horndean: LAA/HD-022 for care
3. Land east of Lindford Road for care

In the coming weeks, we will be providing the council with a suite of technical information that demonstrates the deliverability of sites 1-3 above to give the council comfort that allocating these sites will be sound in the next stage plan.

Please do not hesitate to contact me if you have any queries or require any further information.

Yours sincerely



For and on behalf of Highwood

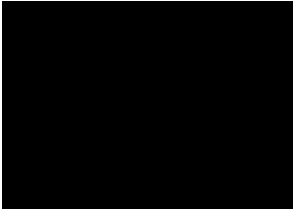
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Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield  
GU31 4EX

26<sup>th</sup> February 2024

**Draft Local Plan 2021-2040 – representation made on behalf of [REDACTED], owners of land on the east side of Lindford Road, Lindford to promote the site for C2 (extra care)**

This representation is made on behalf of [REDACTED] owners of land on the east side of Lindford Road, Lindford, which extends to 0.71 ha to put forward the site for consideration as an allocation for C2 (extra care) to meet a very obvious shortfall in planned provision through the site allocation process in the emerging Local Plan.

**Soft market testing for C2 use/demand**

The owners have undertaken soft market testing with highly respected operators in the C2 care sector to establish if there is commercial interest in the site. A strategy to target specific providers has yielded highly positive engagement, and the owners have received a number of written offers to acquire the site, subject to planning. Written interest has also been received from operators with whom direct contact was not made.

The overwhelming feedback received from experienced operators is that existing ‘care home’ stock within the general geography of East Hampshire is of a poor quality that does not appropriately cater for the C2 (specialist care) sector.

**The plan making requirements of the NPPF (2023)**

Paragraphs 60, 61, 63, 67 and 70 of the revised NPPF (published 19<sup>th</sup> December 2023) are of greatest relevance in the context of plan making requirements, as presented below, with emphasis added.

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

*61. 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 (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

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

67. **Strategic policy-making authorities should establish a housing requirement figure for their whole area,** which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

**“70. 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. To promote the development of a good mix of sites local planning authorities should:**

a) identify, through the development plan and brownfield registers, **land to accommodate at least 10% of their housing requirement on sites no larger than one hectare;** unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

#### **Evidence drawn from the Draft Local Plan 2021-2040 (Regulation 18) Housing Background Paper (January 2024)**

Policy H5 Specialist Housing is of particular relevance to the site under consideration. Paragraphs 4.21 to 4.28 of the Draft Local Plan 2021-2040 (Regulation 18) Housing Background Paper (January 2024), as repeated below.

4.21 The Local Planning Authority has an obligation to ensure that the housing needs for all people are considered and provided for wherever possible. Whilst many people wish to have and retain their independence, for some there is a need for specially designed and/or managed accommodation.

4.22 There is considerable existing provision of older persons accommodation in the district, and more being provided, but there is an ageing population. Indeed when looking ahead over the plan period in terms of the proportion of older people (over 65 year olds) this increases by 36%. Data from the HEDNA therefore reveals that there is a need for about 830 housing units with support (sheltered/retirement housing) and around **760 housing units with care (extra care)** together with additional nursing care bedspaces over the plan period. A number of sites have recently been granted planning permission for older persons units, including the following:

Settlement	Total number of sites
Land East of Horndean	60-bed care home and up to 69 C3 (age restricted) bungalows and apartments
Land at Winchester Rd, Chawton	67-bed purpose built care home and 28 C3 apartments (100% affordable)
Ajax House, Haslemere Road, Liphook	39 retirement apartments

Former Molson Coors site, Alton	integrated retirement community consisting of 95-bed independent living apartments
---------------------------------	--

4.23 A further site at Prince Philip Park, Bordon has a pending planning application for 56 retirement living apartments and 10 affordable flats.

4.24 Proposals for new schemes will be required to demonstrate a need for further provision in that locality, with regard to existing and proposed provision, to guard against an over provision of a particular type of accommodation or care type.

4.25 However, specialist housing is not just for older people; this can also meet the needs of people with physical disabilities, recovering from/living with mental illness, with limited mobility, and those with a learning disability. This could be achieved by providing a range of different types of housing including sheltered housing with care support, staffed hostels, residential care homes, wheelchair accessible housing or housing that is easily adaptable for wheelchair use, (see Policies H2 and H3 which include reference to accessible and adaptable dwellings).

4.26 Policy H5 applies to all specialist and supported accommodation proposals, whether these fall into Use Class C2 (residential institutions) or C3 (dwelling houses), or they provide a mixture of both types of residential use. Where proposals include C3 uses, which allow for independent living, the proposed mix of housing tenures, sizes and property types will be determined on a site-by-site basis. Affordable housing provision will also be expected in accordance with Policy H3. However, this provision may be in the form of supported housing, including extra-care housing for older and younger persons.

4.27 The Local Plan Area faces a demographic challenge in the coming decades, with a substantial rise forecast in its older population and whilst some of the housing needs of older people will in future continue to be met through the provision of general needs accommodation (e.g. mainstream housing, bungalows, step free apartments), there will be an increasing need for specialist accommodation types to cater for this demographic change.

4.28 The number of residents within the Local Plan Area who suffer from dementia and/or a long-term health problem or disability (LTHPD) is increasing and therefore it is important that developments allow people living with dementia or a LTHPD the ability to live well and remain independent for longer. It is acknowledged that good urban design and accommodation with appropriate access to services and facilities enables those living with dementia or LTHPD to remain independent for longer, (see also Policy HWC).

**Appraisal of information drawn from the Draft Local Plan 2021-2040 (Regulation 18) Housing Background Paper (January 2024) in the context of the NPPF 2023**

Data from the HEDNA therefore reveals that there is a need for about 830 housing units with support (sheltered/retirement housing) and around **760 housing units with care (extra care)** together with additional nursing care bedspaces over the plan period. Of those sites that have recently been granted planning permission for older persons units, none of the permitted schemes will provide for C2 use.

In the context of the NPPF 2023, *it is important that a **sufficient amount and variety of land can come forward where it is needed.** 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.***

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

Following publication of the NPPF 2023, with a particular emphasis on the change to paragraph 63 (formerly paragraph 62), Councils must now ensure they shine a laser-like focus on the requirement to conduct an analysis of need for delivery across all the sector's offerings: retirement housing, **housing-with-care** and care homes. Plans mandating a 'one-size-fits-all' approach will be insufficient, meaning authorities will have to ensure they re-examine policy as soon as possible in order to ensure local plans grapple with delivery of a range and a choice of retirement living options for their residents.

***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. To promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.***



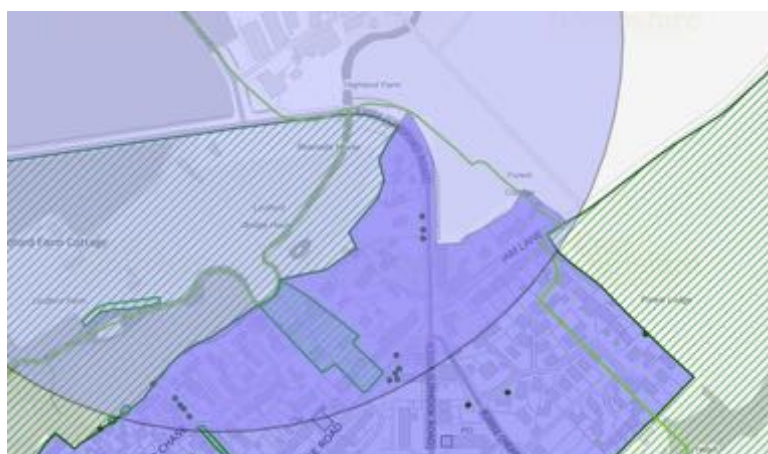
As shown in Figure 2, the site is well related to the settlement of Lindford (with development on two sides of a 3-sided parcel) and land immediately to the east is not the subject of policy CP23 Gaps Between Settlements.

**Figure 2.** CP10 Settlement Boundary Policy and CP23 Gaps Between Settlements



The site falls within the 400m buffer of the SPA.

**Figure 3.** CP10 Settlement Boundary Policy, CP23 Gaps Between Settlements and SPA buffer 400m



### **Highways**

It is proposed that a new highway access to serve the site could be formed by utilising the already configured drop kerb arrangement as represented by the double arrowhead in Figure 4.

Visibility splays greater than 73 metres can be achieved to the north and in excess of 150 metres can be achieved to the south in association with the proposed access. Given the 30 mph speed limit regime in place on Lindford Road, the corresponding visibility splays equate to 43 metres. Accordingly, a safe and suitable access to serve the site can be provided.

**Figure 4.** Proposed highway access to serve the site and associated visibility splays



### **Ecology**

The site owner and promoter of the pre-application scheme commissioned Thompson Environmental Consultants to undertake ecology surveys and assessments regarding the above named parcel of land in 2021. The following suite of documents prepared by Thompson Environmental Consultants are submitted in support (electronic format) of this statement:

- Breeding Bird Survey Letter prepared by Thompson Environmental Consultants (April 2021)
- Report to Inform a Habitat Regulations Screening Assessment and Appropriate Assessment prepared by Thompson Environmental Consultants (June 2021)
- Great Crested Newt Survey Report prepared by Thompson Environmental Consultants (July 2021)
- Covering letter prepared by Thompson Environmental Consultants (March 2022)

In addition, a Preliminary Ecological Appraisal was prepared by enims in May 2019, and an electronic copy of this document is also enclosed. The site has been occupied by grazing animals for in excess of 3 years.

The owners are cognisant that the site is located within the 400m Buffer Zone of the Wealden Heaths II SPA within which a net increase in C3 housing units is precluded as it is not considered possible to mitigate the potential adverse impacts arising from a net increase in C3 dwellings. Such impacts arise from increased recreational pressure on the SPA and cat predation.

The Council are directed to the scheme approved by Waverley Borough Council (planning reference WA/2022/00498) relating to the site at 'Andrews of Hindhead Ltd', Portsmouth Road, Hindhead for the erection of a 74-bed care home (use class C2) with associated car parking landscaping and vehicular access following demolition of

existing buildings and structures. As drawn from paragraphs 1.2, 8.12 and 8.13 of the Planning Statement (emphasis added):

1.2. *This application follows on from an earlier scheme that was originally submitted for 76 bed care home, amended to 74 beds, but which was refused on 14th October 2021. The Council’s determination of the earlier scheme established a number of points including:*

- *The acceptability of the principle of redeveloping the site, including no objection to the loss of the existing retail, workshop office and fitness studio uses on the site.*
- *The acceptability of the principle of a new care home on the site.*
- *Owing to the nature of the occupiers of the proposed care home, acceptance that the proposed C2 care home, within 400 metres of the Wealden Heath II SPA, will not have a harmful impact (No Natural England objection).*

8.12. *Thirdly, the application site lies within the Wealden Heaths I Special Protection Area (SPA) 5km Buffer Zone, the Wealden Heaths II SPA 400m Buffer Zone and the East Hants 5km SPA Buffer Zone.*

8.13. *Notwithstanding the location within the defined built-up area, the site is located within the 400m Buffer Zone of the Wealden Heaths II SPA within which a net increase in C3 housing units is precluded as it is not considered possible to mitigate the potential adverse impacts arising from a net increase in C3 dwellings. Such impacts arise from increased recreational pressure on the SPA and cat predation. However, a C2 use such as the one proposed is acceptable by virtue of the nature of the operation, whereby the care home provides provide 24-hour care for elderly and infirm residents with limited mobility, also suffering from conditions such as dementia. As a result, those living in the care home will not be able to leave the care home independently and will not be predisposed to undertake activities such as going for walks, cycling or jogging, which are the activities identified as having a potential impact on the integrity of the nature conservation status of the SPA sites due to the recreational impact.*

The output of the Land Availability Assessment for the site at Portsmouth Road, Hindhead is presented below.

LAA ID Reference: 145			
Site Address	Land at Oakdale (Andrews of Hindhead), Portsmouth Road, Hindhead		
Site Size (ha)	0.6	Rural or Urban	Urban
Parish	Haslemere	Settlement	Hindhead
Existing Use	Industrial/Commercial/Residential/Gym	Proposed Use	Residential/Extra-Care (C2)
Proposed (or estimated) yield	67 bedspaces (equivalent to 35 dwellings)	Source of Yield	WBC

Site Description	Estimated Timescales for Delivery
This is a building currently in use for conservatory and garden equipment sales as well as a grassed area used for shed show space and car parking. To the north of the site, on Royal Huts Avenue, is an area of recent residential redevelopment with three storey block of flats and townhouses. To the south of the site are late 19th/early 20th century housing of three storeys, and the northwest there are smaller detached houses.	1-5 Years: 67 bedspace s (equivalent to 35 dwellings)
<b>Key Designations</b>	6-10 Years
<ul style="list-style-type: none"> <li>• Wealden Heaths I Special Protection Area 5 Km zone</li> <li>• Wealden Heaths II Special Protection Area 400m zone</li> </ul>	11-15 Years
<b>Suitability</b>	
The vast majority of the site lies within 400m of the Wealden Heaths SPA (Phase II) where it is unlikely that the effects of C3 residential development of this site on the SPA can be effectively avoided or mitigated, unless within the capacity of the Hindhead Concept Area. However, following liaison with Natural England it is considered that the portion of the site within 400m of the SPA would be suitable for redevelopment to a C2 high dependency care home.	
<b>Achievability</b>	
There is a reasonable prospect that the development of housing would be achievable during the Plan period. Potentially there could be contamination on the site, if there is, depending on the level, the cost of dealing with it could affect development viability.	
<b>Availability</b>	
There is a pending planning application for C2 development on the site and it is therefore available for C2 development.	



The site was allocated under site policy DS03 for a 74-bed high dependency care home in the Waverley Borough Local Plan Part 2: Site Allocations and Development Management Policies document dated March 2023.

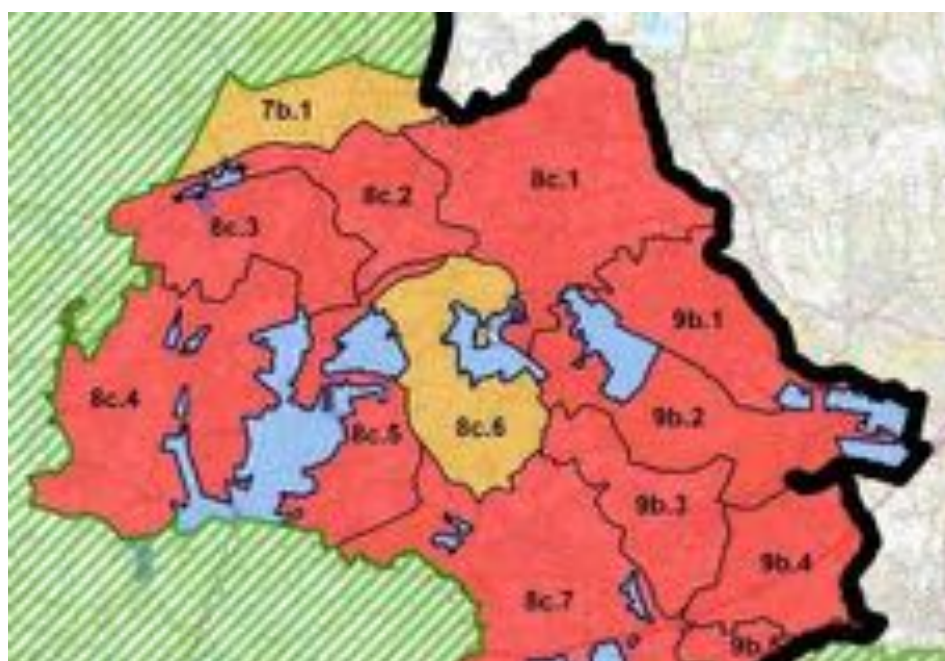
### **Landscape**

As part of the evidence base to support the new Local Plan an up-to-date Landscape Capacity Study has been produced by consultants Terrafirma (September 2018). The settlement of Lindford is positioned in the central area of parcel 8c.6 (blue colour denotes settlement). The site in question is located immediately adjacent to settlement.

The conclusion and recommendations and potential capacity of the local area in respect of parcel 8c.6 is as follows:

*“Local area 8c.6 has a medium/low capacity, constrained by its character and its designated sites. There are views from public footpaths, common land, conservation areas and rural lanes. The area retains a clear sense of history, especially within the conservation areas that border or lie within the local area, and contains characteristics typical of the wider LCA. It is possible that a very small amount of additional development could be accommodated around clusters of built form or building conversions, on brownfield sites or adjacent to the settlement edge within the area 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, although great care would need to be taken to avoid any landscape or visual harm. Further development would also risk the coalescence of Headley/Lindford/Arford. The area should otherwise generally remain undeveloped.”*

**Figure 5.** Landscape capacity study extract

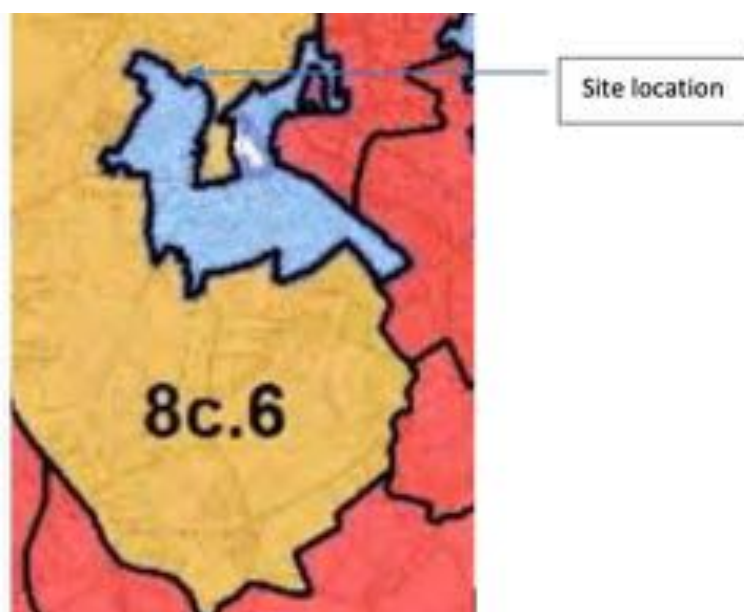


This analysis provides a clear steer that a small amount of additional development could come forward along the eastern side of Lindford. Reference to aerial images confirms the site in question is the only parcel on the eastern side of Lindford that exhibits the following characteristics:

- In landscape terms the site is very well contained by a belt of landscape planting along its eastern boundary. This would represent a defensible boundary if the site were allocated for C2 use and the settlement boundary changed to coincide with the eastern site boundary
- The currently defined settlement boundary to Lindford incorporates the run of housing along Frensham Lane, and so the parcel projects to the east as far as the extent of the parcel, and so the inclusion of the parcel represents a credible 'rounding off' of settlement
- The parcel is not subject to policy CP23 – 'Gaps Between Settlements', whereas land adjacent to but outside the eastern settlement boundary to Lindford is subject to this designation.

Accordingly, the site under promotion is the only credible parcel that could come forward in accordance with the findings of the Landscape Capacity work undertaken by TerraFirma without imparting associated landscape harm.

**Figure 6.** Landscape capacity study extract focusing on parcel 8c.6 and the settlement of Lindford



### **Flooding**

The LLA summary sheet for the site advises “a small area on the northern part of the site is susceptible to surface water flooding.” Figures 7 and 8 show the corresponding flood and surface water risk, and confirms there is no risk of flooding from the nearby watercourse, and in respect of surface water the drain that runs alongside the western site boundary is the subject of low risk of surface water flooding.

**Figure 7.** Flood map extract



**Figure 8.** Surface water flood risk map



## **Conclusions**

This representation is made on behalf of Mr and Mrs Hall, owners of land on the east side of Lindford Road, Lindford, which extends to 0.71 ha to put forward the site for consideration as an allocation for C2 (extra care) to meet a very obvious shortfall in planned provision through the site allocation process in the emerging Local Plan.

The allocation and future development of the site for C2 use would not harm the character and appearance of the area, and is acceptable in relation to highway matters, flood risk and drainage. The currently defined settlement boundary to Lindford

incorporates the run of housing along Frensham Lane, and so the parcel projects to the east as far as the extent of the parcel, and so the inclusion of the parcel represents a credible 'rounding off' of settlement.

Comparisons have been drawn between the site under promotion and the site at Portsmouth Road, Hindhead by virtue of the fact both sites are located within the 400m Buffer Zone of the Wealden Heaths II SPA.

In respect of the site at Portsmouth Road, Hindhead, it was concluded that a C2 use such as the one proposed is acceptable by virtue of the nature of the operation, whereby the care home provides provide 24-hour care for elderly and infirm residents with limited mobility, also suffering from conditions such as dementia. As a result, those living in the care home will not be able to leave the care home independently and will not be predisposed to undertake activities such as going for walks, cycling or jogging, which are the activities identified as having a potential impact on the integrity of the nature conservation status of the SPA sites due to the recreational impact.

The site at Hindhead was assessed through the Waverley Local Plan land availability assessment and ultimately allocated under site policy DS03 for a 74-bed high dependency care home in the Waverley Borough Local Plan Part 2: Site Allocations and Development Management Policies document dated March 2023.

Data from the HEDNA therefore reveals that there is a need for about 830 housing units with support (sheltered/retirement housing) and around **760 housing units with care (extra care)** over the plan period. This is an acute need. Of those sites that have recently been granted planning permission for older persons units, none of the permitted schemes will provide for C2 use.

In the context of the NPPF 2023, *it is important that a **sufficient amount and variety of land can come forward where it is needed.** 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.***

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

**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.** To promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, **land to accommodate at least 10% of their housing requirement on sites no larger than one hectare;** unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.

The need for specialist care forms a crucial component of the overall housing requirement. As drafted, Policy H5 Specialist Housing will not appropriately meet the requirement of **760 housing units with care (extra care)**, and in response East Hampshire District Council must seek to allocate small-scale sites for C2 use. Owing

to the policy constraints that apply to the area centred on Lindford, coupled with poor quality/ageing stock, it is not surprising to learn that the relevant datasets shine a spotlight on there being a pressing need for C2 use.

It is respectfully requested that the site is allocated for C2 use, and in order to facilitate the allocation the landowners would be prepared to provide any further additional required by the Local Planning Authority. In light of discussions that are advancing, any further work is likely to be provided in combination with a chosen provider.

## Appendices

DS 03: Land at Andrews, Portsmouth Road, Hindhead			
Land at Andrews as identified on the Policies Map is allocated for a 74 bed high dependency care home, equivalent to 39 additional dwellings, subject to:			
<p>a) Retention and enhancement of mature trees and other landscape features wherever possible.</p> <p>b) The demonstration that development will not have a likely significant effect on protected habitats sites.</p>			
Size	0.55	Existing use	Mixed
LAA ID	145	Approximate density	70 dph
Key Constraints:	<ul style="list-style-type: none"> <li>Wealden Heaths I Special Protection Area 5 Km zone</li> <li>Wealden Heaths II Special Protection Area 400m / 1 Km zone</li> <li>East Hants Special Protection Area 5 Km zone</li> <li>Source Protection Zone 3</li> </ul>		
Description:	<p>The site is currently used for a mixture of uses, including: offices, residential, industrial workshops, retail, leisure and storage. The majority of the site is located within the 400m buffer zone of the Wealden Heaths II Special Protection Area (SPA). As a result, to ensure the integrity of the SPA is not harmed by a proposal, it is considered that redevelopment of the site from its current mixed use to a high dependency care home would be suitable. In April 2022, the site has gained planning permission (WA/2022/0498) for a 74-bed high dependency care home.</p>		
<b>Delivery Rates:</b>			
2026-2027			
	39		

### Site Plan



# Flood map for planning

Your reference  
<Unspecified>

Location (easting/northing)  
480986/136660

Created  
21 Feb 2024 13:19

**Your selected location is in flood zone 1, an area with a low probability of flooding.**

You will need to do a flood risk assessment if your site is **any of the following:**

- bigger than 1 hectare (ha)
- In an area with critical drainage problems as notified by the Environment Agency
- identified as being at increased flood risk in future by the local authority's strategic flood risk assessment
- at risk from other sources of flooding (such as surface water or reservoirs) and its development would increase the vulnerability of its use (such as constructing an office on an undeveloped site or converting a shop to a dwelling)

## Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

Flood risk data is covered by the Open Government Licence **which** sets out the terms and conditions for using government data. <https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

Use of the address and mapping data is subject to Ordnance Survey public viewing terms under Crown copyright and database rights 2022 OS 100024198. <https://flood-map-for-planning.service.gov.uk/os-terms>








## Flood map for planning

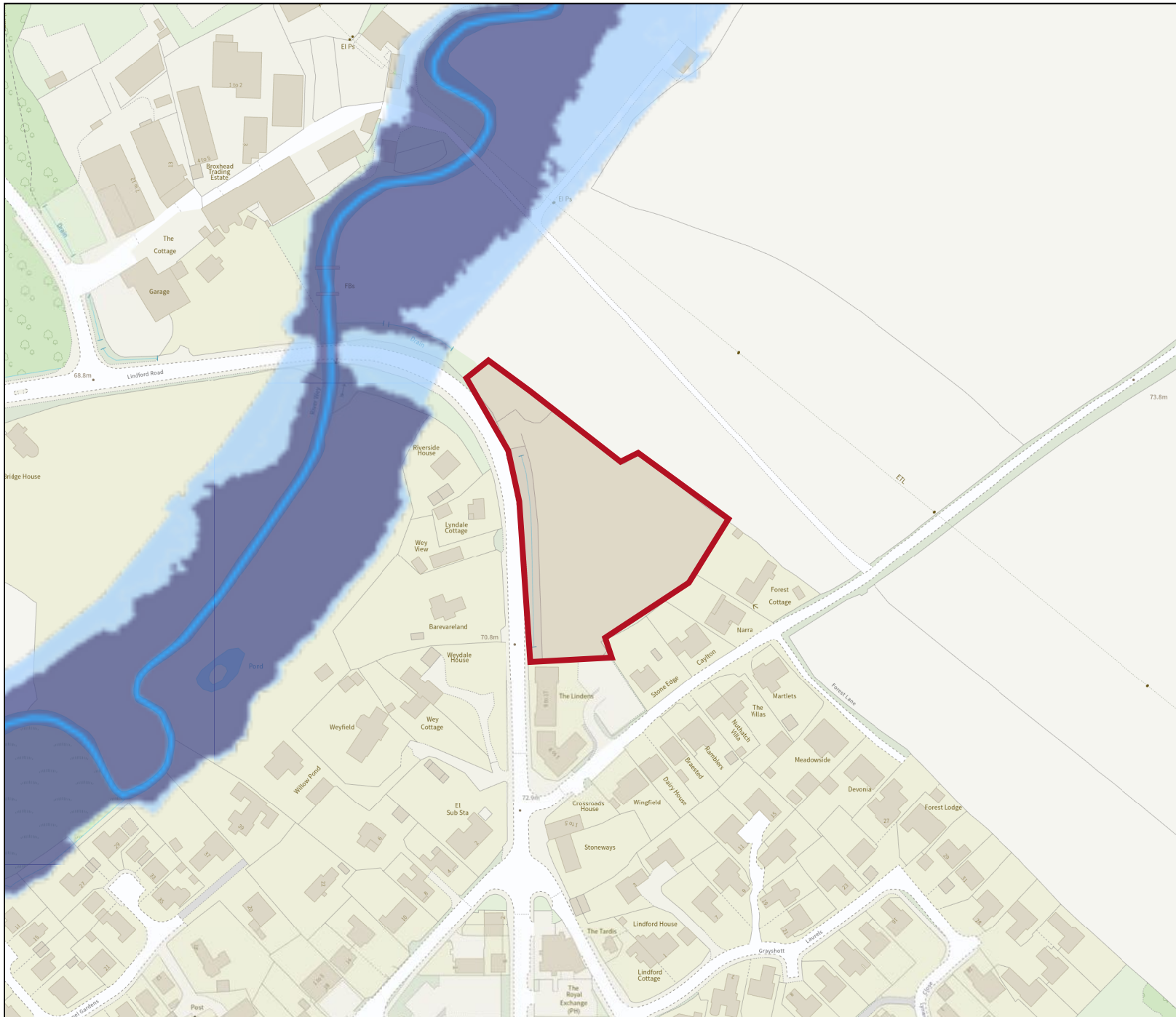
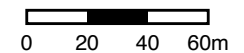
Your reference  
**<Unspecified>**

Location (easting/northing)  
**480986/136660**

Scale  
**1:2500**

Created  
**21 Feb 2024 13:19**

-  Selected area
-  Flood zone 3
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Water storage area





# PLANNING STATEMENT

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FULL PLANNING APPLICATION FOR THE  
DEMOLITION OF EXISTING BUILDINGS  
AND STRUCTURES AND THE ERECTION  
OF A 74-BED CARE HOME (USE CLASS  
C2), WITH ASSOCIATED CAR PARKING,  
LANDSCAPING AND ACCESS TO  
PORTSMOUTH ROAD

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ANDREWS OF HINDHEAD  
PORTSMOUTH ROAD  
HINDHEAD  
GU26 6AL

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Prepared by:

  
**Wolf Bond Planning LLP**

On behalf of ME Hindhead Limited,  
Seetwo Developments Limited and  
Hamberley Properties FV (Hindhead) Limited

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**WBP REF: DB/LP/8142**

**January 2022**



**Wolf Bond Planning**  
Chartered Town Planning Consultants

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## **ANNEX 1**

Operator's Statement

## **1. INTRODUCTION AND SUMMARY**

- 1.1. This Statement has been prepared in support of a full planning application for the redevelopment of the Andrews of Hindhead site, and the erection of a 74-bedroom care home (Use Class C2) with car parking and associated landscaping with access from Portsmouth Road.
- 1.2. This application follows on from an earlier scheme that was originally submitted for 76 bed care home, amended to 74 beds, but which was refused on 14<sup>th</sup> October 2021. The Council's determination of the earlier scheme established a number of points including:
1. The acceptability of the principle of redeveloping the site, including no objection to the loss of the existing retail, workshop office and fitness studio uses on the site.
  2. The acceptability of the principle of a new care home on the site.
  3. Owing to the nature of the occupiers of the proposed care home, acceptance that the proposed C2 care home, within 400 metres of the Wealden Heath II SPA, will not have a harmful impact (No Natural England objection).
  4. The agreed need for an additional purpose built high-quality care home.
  5. An acceptable means of vehicular and pedestrian access off the Portsmouth Road (No SCC Highway objections).
  6. Acceptable level of car parking provision and traffic generation (No SCC Highway objections).
  7. Agreed no highway safety implications arising from the proposed redevelopment of the site (No SCC Highway objections).
  8. Acceptable impact on neighbouring residential amenity in relation to light, outlook and privacy.
  9. Acceptable relationship with retained TPO boundary trees.
  10. An agreed new landscaping scheme.
  11. A site located in the lowest flood risk zone (Zone 1).
  12. An acceptable SuDS strategy.
  13. An acceptable surface water drainage strategy (No outstanding objections from either Thames Water or the Lead Local Flood Authority).

14. Thames Water has confirmed that there is adequate capacity to cater for the foul water discharge from the proposed care home with no outstanding objections.
  15. An absence of protected species on the site but a set of measures in place to secure a net gain in biodiversity.
  16. No archaeological or contaminated land issues subject to appropriate conditions.
  17. An energy efficient and sustainable development scheme compliant with relevant local plan policies.
  18. An agreed position regarding the absence of material impact on local community infrastructure.
- 1.3. The only outstanding issue and the one the subject to the reason for refusal related to the design of the proposed care home and its resulting impact on the character and appearance of the area. Following this specific and focused reason for refusal, discussions and meetings have occurred with the Council in order to address the design of the care home. Part of this process included highlighting a number of different design approaches. The conclusion from this process was that the Council were seeking a design more in keeping with the vernacular style and use of external materials that complement those of the local area. This new application scheme reflects this new design thereby resolving the single reason for refusal. The result is therefore a development plan compliant scheme that can be approved without delay.
- 1.4. This Statement sets out the characteristics of the site and surrounding area, provides information on the planning history for the site, and sets out an analysis of the proposal against the relevant planning policy context.
- 1.5. The application is accompanied by several additional supporting reports including an updated design and access statement, marketing report, a tree survey and arboricultural impact assessment, a daylight report, a transport statement, travel plan, draft parking management plan, a contamination remediation report, an ecology assessment, and Waverley Borough Council Biodiversity Checklist. These are referenced throughout this Statement. As noted, the proposal has been subject to positive pre-application discussions with the Local Planning Authority. Further public consultation has also occurred, the findings of which are summarised in a Statement

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of Community Involvement. The full list of supporting documents is set out in the covering letter that accompanies this planning application.

### *Summary*

1.6. This Planning Statement concludes that the proposal is policy compliant and would provide an efficient reuse of an unattractive previously developed site within an established urban area in much need of regeneration due to the constraining factor of the 400m SPA buffer zone, to meet an ongoing demand for specialist care accommodation for older people. The positive townscape benefits arising by replacing an unattractive, piecemeal, and tired site with an attractive and more compatible care home highlight one of the principal reasons and merits behind the application scheme. The redevelopment of the site represents a logical development opportunity for enhancing the site and surrounding area, in a sustainable location well suited to meeting the needs of future occupiers. The proposal secures many important benefits. These include:

- The proposed care home use is compatible with the location of the site within the 400m SPA buffer zone, as confirmed by Natural England's DAS response during the preapplication process. Accordingly, the proposed new use in this otherwise constrained area delivers a significant number of environmental /townscape benefits unlike any other alternative land use;
- The redevelopment and loss of unattractive buildings that make no positive contribution to the street scene and surrounding area with a character-led, well designed building and use that collectively will enhance the character and appearance of the site and surrounding area, and will deliver significant townscape, and therefore environmental, benefits;
- A development scheme that successfully retains all important trees on the site including all TPO trees;
- The loss of a non-conforming commercial use in a predominantly residential area will only enhance the character and appearance of the area. The proposed care home will represent a more benign use compatible with the surrounding residential environment;

- Responding to an identified and established need for specialist housing that is not otherwise being met, which counts equally to meeting Waverley Borough's overall housing need;
- Making optimum use of previously developed land, particularly important in an Authority that is constrained by Green Belt land and European nature conservation designations;
- Having a catalytic effect in terms of freeing up existing housing stock;
- Health and well-being benefits, including reduced isolation and associated mental health issues, and reduced pressure on local health care facilities and services;
- Maintaining and enhancing the economic/employment function of the site;
- Adding to the vitality of Hindhead;
- Direct, indirect and induced economic benefits during construction and on-going operation of the care home;
- Improved and increased variety of new jobs generated by a care home.

1.7. The proposals are consistent with relevant development plan policy and should be approved without delay. Other material considerations apply, including the aforementioned economic, social and environmental benefits. For all these reasons, the Planning Statement concludes that planning permission should be granted.

## 2. THE SITE AND ITS SURROUNDINGS

- 2.1. The site is located in the settlement of Hindhead and extends to 0.68 ha. It comprises a mixture of built form incorporating a garden centre with ancillary offices, workshops, retail, and storage uses. There are two residential units on the site and a small leisure (gym) use that has become established over time, although the gym used ceased in March 2020 and the operator has since gone into liquidation. A car park accessed off Royal Huts Avenue lies on the south-western half of the site. The buildings and external areas are characterised by functional buildings and hardstanding, with limited landscaping, and are in a dilapidated state such that they make a limited contribution to the site or the streetscene of the surrounding area.



Extract from site location plan

- 2.2. The site is bounded to the north east, north west and south west by existing residential properties. To the south east, the site is bounded by the Portsmouth Road, with existing residential properties set back on the opposite side of the road. The surrounding area is residential in character, with properties generally set back from the road with private front gardens and well-established boundary trees and hedges.



**View of the site from Portsmouth Road, travelling north-east, from Google Streetview, August 2018**  
– site characterised by outdated buildings which are utilitarian in form and appearance. These contrast with the residential surroundings



**View of the site from opposite side of Portsmouth Road, from Google Streetview, August 2018**

- 2.3. The site is characterised by its use as a lawnmower servicing, sales and supplies business, with one larger building accompanied by an eclectic collection of outbuildings with a mix of uses. The site has evolved over time in response to changing market conditions, and is in need of investment, only likely to be achieved through its



redevelopment. In this sense, the site does not make a positive contribution to the character and appearance of the area.

- 2.4. Hindhead falls within the urban area, and the focus in the development plan is to prioritise reinvestment in the urban fabric through the redevelopment of brownfield sites, including in settlements such as Hindhead.
- 2.5. In locational terms, the site is well located in relation to local services, being within a 10-minute walk of the centre of Hindhead, as its associated shops and services, and 250m from the local neighbourhood shops and services in Tilford Road to the north of the site, which includes a dental centre and post office.
- 2.6. As detailed in the Transport Statement accompanying this planning application, the application site is well located for pedestrian home to work trips from much of Hindhead and Grayshott with good footway and street lighting provision in the local area. The use of a bicycle extends the accessible area to include Churt, Headley Down and much of Haslemere, including the railway station. There are local bus services which would enable travel to work by staff at the proposed care home, with bus stops in each direction within approximately 50m of the application site.



**View of application site from Royal Huts Avenue. A tired site and frontage in urgent need of regeneration and enhancement**

- 2.7. The site has become increasingly run down and dilapidated since the opening of the A3 Hindhead bypass. It detracts from the immediate area, in particular Royal Huts Avenue. The uses are no longer sustainable from an economic perspective. A new use

for the site is required that will regenerate and enhance the site and its immediate surroundings. In this sense the proposed care home is a logical use compatible with the location of the site.

### 3. THE PROPOSAL

- 3.1. The proposal would deliver the re-use and redevelopment of the former Andrews site, a previously-developed and unattractive site in the settlement of Hindhead that is limited in its use due to the policy restrictions of being located within 400m of the SPA. The planning application is for the delivery of a 74-bed care home in Use Class C2, with the provision of car parking and associated landscaping. The care home would be occupied by residents who are mentally and/or physically frail, have mobility problems, suffer from paralysis, or are in need of assistance with the normal everyday activities of life. In other words, this will be a high dependency, end of life care home, falling within Use Class C2, a use compatible with the 400m SPA buffer zone.
- 3.2. Full details of the scheme are set out in the technical reports submitted in support of this planning application, including the Design and Access Statement. A summary of the matters that have influenced the proposal is set out below. However, the full suite of supporting technical reports should be referred to in the consideration of the application.



Extract from Proposed Site Plan

### *Care home facility*

- 3.3. The design of the 74-bed care home facility is operator led, with care home operator Hamberley Development Ltd in place to implement and run the care home. The proposal has therefore been designed to meet a specific care need in a format that has been developed to successfully meet future residents' requirements. It allows residents to stay in the facility even as their care needs change. It will offer residential, nursing, respite and dementia care.
- 3.4. It is designed to accommodate communal dining and sitting areas on each floor, with a staff room on ground floor level, and changing facilities on each floor, laundry and catering facilities, and a ground floor level with administrative facilities (including a manager's office and administrative office). Communal facilities consist of a café, cinema, hairdresser and shared lounge/dining area for residents. All bedrooms are en-suite and reflect the requirement that residents will need full time care, and do not therefore have individual, independent, catering facilities. The provision of en-suite bedrooms, nursing stations and communal lounge/dining facilities is repeated at first and second floor levels, with the addition of communal day spaces, assisted bathrooms and spa/treatment rooms. It is clear from the nature of the internal layout that the care home is a high-quality purpose-built and modern communal facility falling within Use Class C2.
- 3.5. The extract from the ground floor layout plan below shows the style and configuration of the care home layout and demonstrates that the facility is designed to meet the care needs of those with full-time care requirements, rather than with any form of independent living.



**Extract from ground floor plan of care home**

- 3.6. The external layout of the site provides access from Portsmouth Road, with access to parking and space for vehicle turning. The configuration of the layout accommodates space for turning of larger wheel-base vehicles (see accompanying Transport Statement). There is space to the front of the building to accommodate ambulance and delivery parking.
- 3.7. The proposal includes external communal amenity areas around the building, focused on the central horseshoe spaces, offering private communal landscaped and patio areas, with seating. All ground floor rooms have external patio amenity space. Communal balconies are also incorporated into the design too.
- 3.8. The proposed care home building is provided over three floors with its design sympathetic to the surrounding built form, being designed over two and half stories in a traditional format with pitched roofs and gables.
- 3.9. The proposed design is entirely acceptable within the existing street scene, taking its design clues from the finish of nearby development, and is sympathetic to the visual setting provided by adjoining land uses, offering a net enhancement to the appearance of the streetscene when compared to the existing use of the site. The design and form of the building has been subject to pre application consultation with the Council who welcomed the approach new towards the design of the building. The new design is

reproduced beneath the previous scheme refused under WA/2021/01365 in the images below.



**Extract from 3D Visual showing view of the refused care home from Royal Huts Avenue**



**Extract from 3D Visual showing view of the proposed care home from Royal Huts Avenue**



**Extract from 3D Visual showing north-eastern elevation of the refused care home**



**Extract from 3D Visual showing north-eastern elevation of the proposed care home**



**Extract from 3D Visual showing refused Portsmouth Road / Royal Huts Avenue elevation of the proposed care home**



**Extract from 3D Visual showing proposed Portsmouth Road / Royal Huts Avenue elevation of the proposed care home**





**Extract Visual showing view of the refused care home within the Portsmouth Road Street scene**



**Extract Visual showing view of the proposed care home within the Portsmouth Road Street scene**

- 3.10. In terms of the placement of the building on the site, this has resulted from a designed approach, informed through the pre-application engagement process with the Council, the existence of protected trees to the south-western and north-eastern boundaries of the site, the configuration of and relationship to neighbouring land uses, and the need to secure suitable separation distances in respect of overlooking and outlook. Further information on the evolution of the scheme through the pre-application process is set out in the Design and Access Statement that accompanies this application. Further analysis on the detailed relationship with neighbouring land uses is also offered in the main issues section of this Planning Statement.

#### *Trees and landscaping*

- 3.11. The site is characterised by trees along the Portsmouth Road frontage and south western boundary. The site also includes hard surface area and developed ground in the vicinity of these trees. A tree survey has been completed that assesses the condition of the trees and defines root protection areas around them having regard to the British Standard.
- 3.12. The proposed care home has been carefully located to ensure all trees on the site are to be retained. The building is also sited to avoid the root protection areas.

- 3.13. New trees and hedges are to be planted around the site, in particular along the rear site boundary adjacent to neighbouring residential properties.
- 3.14. Landscaping will also be provided around the courtyard and communal spaces further enhancing the setting to the care home building whilst creating attractive landscaped communal spaces.
- 3.15. Overall, the proposed retention of trees and the new landscaping scheme will complement the care home building which collectively will result in a significant enhancement to the character and appearance of the site and its contribution to the immediate and wider area.

#### *Ecology*

- 3.16. The site is supported by an Ecological Appraisal and a Technical Note on Biodiversity Net Gain. This has been carried out based on the results of a desktop study, bat surveys, and a Phase 1 habitat survey.

#### *Access and car parking*

- 3.17. The application is supported by a Transport Statement, which sets out a description of the site and its location, provides a review of the local highway network and public transport services, and provides an analysis of the existing and future site traffic attraction relating to the proposed development. This notes that the daily flows for the proposed care home are similar to the accepted vehicle flows arising from the existing land uses on the site. The peak hour flows are expected to be very low and there will be no material impact on the local highway network.
- 3.18. The Transport Statement also sets out an assessment of details of parking demand and provision and exceeds the requisite parking standard by 2 car parking spaces. Parking provision includes a shared ambulance and delivery bay. The proposed development therefor achieves the level of provision normally expected for care homes. Further analysis of TRICS data, as provided in the Transport Statement, demonstrates that the proposed parking provision is comparable to other care home sites.

- 3.19. The application is also accompanied by an Interim Travel Plan, drawn up with Hamberley Developments Ltd, as the proposed care home operator. Hamberley is committed to encouraging a sustainable way of life and this Interim Travel Plan (ITP) provides details of the measures which will be introduced to encourage the use of sustainable transport measures and in particular, a reduction in single occupancy car journeys.

#### 4. SITE PLANNING HISTORY

- 4.1. There has been a use on the site which relates to the activity associated with the lawnmower business and associated outbuildings for a number of years, since the mid-1970s.
- 4.2. Only the most recent planning applications are listed below.

WA/2021/01365

ME Hindhead Ltd Seetwo Developments Ltd - Hamberley Properties FV (Hindhead) Limited

Erection of a 74-bed care home (Use Class C2) with associated car parking, landscaping and vehicular access following demolition of existing buildings and structure (as amended by plans received 02/09/2021 and 23/09/2021) at Andrews Of Hindhead Ltd Andrews, Portsmouth Road, Hindhead, GU26 6AL

**REFUSED**

WA/2018/0021

M Petarnella

04/01/2018

Change of use from retail (Use Class A1) to personal training studio (Use Class D2) (as amended by plans received 15/03/2018 and amplified by email received 18/04/2018)

**GRANTED SUBJECT TO CONDITIONS**

WA/2016/1833

Renaissance Retirement Ltd

09/09/2016

Outline application with access, layout and scale to be determined for the erection of 2 buildings to provides 38 sheltered apartments for the elderly and 13 retirement cottages (total of 51 dwelling units); associated basement parking, surface garages and surface parking spaces (total of 57 parking spaces); refuse stored; electric pavement car and cycle stores following demolition of existing dwelling and buildings at Andrews of Hindhead, Portsmouth Road, Hindhead GU26 6AL

**REFUSED**

WA/2010/1103

10/08/2010

Change of use of land to temporary car park during construction period. Application for advertisement consent for temporary display of barn timber fame with associated advertising comprising three non-illuminated signs.

**ADVERTISEMENT CONSENT**

WA/2010/0603

08/06/2010

Temporary display of barn timber fame with associated advertising comprising three non-illuminated signs.

**TEMPORARY PERMISSION**

WA/2007/0936

14/06/2010

Erection of a building, siting of a portaloos and use of 6 car parking bays to provide a car valeting business for a temporary period.

**REFUSED**

- 4.3. The full planning history extending back to the mid-1970s can be viewed on the Council's website.

## 5. PRE-APPLICATION ENGAGEMENT

- 5.1. The applicant engaged with the Local Planning Authority through pre-application discussions to help shape the original application. Feedback from the pre-application process, received from the LPA on 20<sup>th</sup> October 2020, supplemented by a meeting on 2<sup>nd</sup> December 2020, is relevant in considering the planning application. Headlines and confirmation from this original pre-application feedback are set out below.

### *Emerging Local Plan Part 2 allocation*

- 5.2. The emerging Waverley Local Plan Part 2 allocates the site for a 67-bed care home under Policy DS03.

### *Meeting established housing needs*

- 5.3. The proposal would assist in meeting the need for homes (900) in Haslemere over the Waverley Local Plan Part 1 period.

### *Affordable Housing*

- 5.4. There is no requirement for affordable housing as the proposed use falls within Use Class C2.

### *Making best use of previously developed land to deliver housing*

- 5.5. The priority is to develop brownfield sites but there is a lack of such suitable and available sites. The brownfield status of the site would therefore be a factor to consider in weighing up the planning balance.

### *Loss of existing dwelling*

- 5.6. The usual policy presumption against the loss of existing dwellings is overcome by the provision of a care home.

### *Provision of a care home*

- 5.7. The proposal would assist in meeting an identified need for accommodation for older people, and this is a benefit to the proposal. This would be weighed in the planning balance when considering the loss of any employment and retail floorspace, as would any employment that a care home would generate.

*Impact on the SPA*

- 5.8. It is noted that subject to the imposition of the condition set out in the pre-app response, it is unlikely that NE would raise objection to the proposal. The Council would consider NE's views at the time of any planning application and would also undertake an Appropriate Assessment. This subsequently confirmed no impact following the determination of the last planning application (WA/2021/01365).

*Visual Amenity*

- 5.9. A proposal of this scale and nature may be considered appropriate, however, further detail regarding elevations and the relationship with surrounding neighbours should be provided at the application stage, including the submission of street scene 3D visuals.

*Impact on Residential Amenity*

- 5.10. The bulk of development is kept away from the rear boundary and this approach is welcomed and ensures a satisfactory relationship between the new building and the majority of dwellings that back onto the site.
- 5.11. The provision of an area of car parking to the east of the site ensures that there is sufficient distance between the development and the flats at 54-62 Royal Huts Avenue to ensure no loss of light, outlook or privacy to these dwellings. There is also sufficient distance between the proposed new building and the properties on the southern side of Portsmouth Road.
- 5.12. Particular consideration should be given to the western wing of the building and its relationship to the rear boundary of no.22 Glenville Gardens. Any windows proposed in the northern elevation of this wing should be non-habitable and obscurely glazed. In addition, the relationship with Heather Lodge, and with no. 1 Royal Huts Avenue, should also be addressed. These matters were subsequently addressed through the last planning application and further amendments to it following negotiations with planning officers.

*Car Parking provision*

- 5.13. A 74-bed care home requires 38 car parking spaces, so the proposal meets the required car parking standard. A separate pre-application engagement response with the Highway Authority confirmed that Surrey County Council were happy with the proposed access off the Portsmouth Road and the level of onsite parking provision.

*Loss of employment, retail and D2 use*

- 5.14. An application would have to be accompanied by a Marketing Report that demonstrated that the site had been marketed for a period of a year or over to justify the loss of the employment use. Alternatively, an updated report that considers the viability of the employment use may be sufficient, supported by reference to the need for housing and the current lack of suitable available brownfield sites to deliver the housing to meet the requirement.
- 5.15. In addition, marketing information should be provided to demonstrate that the retail use is also unviable. With regard to the D2 use, this has resulted from a retrospective planning application for a change of use that had already occurred. Evidence will need to be provided to demonstrate that the existing use is no longer required, no other leisure provision is required or appropriate in the area; alternative provision can be made.

*Follow up pre-application meeting*

- 5.16. Following the initial pre-application feedback, a virtual meeting was held with the case officer and the tree officer, and this discussion focused on addressing the parameters that have informed the siting of the proposed care home. These include the trees on and adjoining the site, and the relationship with neighbouring properties.
- 5.17. Following this meeting, a further iteration of the Proposed Site Plan was submitted to the case officer for review and comment. This made a number of changes to the proposal, including the following:
1. The building has been moved 2.4m to the north east. This has the immediate effect of significantly increasing the distance of the south-western elevation away from the trees and their respective root protection zones that form the south-western boundary of the site between it and Heather Lodge/Little John. As a result, the proposal will no longer have any effect on the root protection zones (shown in green dashed lines) of these trees whilst also creating a sustainable relationship between these trees and the proposed care home in terms of separation space and light. The result avoids any pressure to remove these trees.



2. As discussed, the nature of the proposed use, being an end-of-life care home, lends itself to a use where rooms and outdoor spaces are probably ideal when there is an element of shade. That said, the new resulting relationship is now more than acceptable in respect of this matter. The internal communal rooms in the southern corner of the building and the communal outdoor space have a more open aspect and are some distance from tree canopy spreads to the west and south.
3. The central section of the proposed building is now slightly staggered thereby ensuring that the root protection zone associated with the mature trees along the Portsmouth Road frontage is effectively avoided leading to an entirely acceptable relationship between the new building and these trees.
4. The new north eastern elevation to the central section is now 13.5m minimum, 20.6m maximum off the application site rear boundary and 35m away from an oblique angled rear elevation of No. 21 Glenville Gardens. Accordingly, this amendment does not give rise to any new residential amenity issues in respect of either overlooking or overbearing relationships. The resulting rear communal courtyard is not compromised by this proposed change either.
5. The car parking area on the north eastern part of the site has been rationalised and made more efficient to accommodate the relocation of the care home building to the north east. This has been achieved by designing the car parking layout around the ambulance and delivery vehicle turning circles thereby reducing unnecessary hard surface areas but maintaining existing levels and location of landscaping. One parking space (previously located next to the bin store) has been lost but replaced by adding one to the tandem parking. The total of 38 parking spaces plus the ambulance/delivery bay remains.

5.18. In response to the above amendments, the case officer confirmed by email dated 11<sup>th</sup> February 2021 that the amended plans were acceptable in relation to amenity space and impact on neighbours. Further feedback was awaited from the tree officer, but this has not been forthcoming. Nevertheless, the tree matters are dealt with satisfactorily, a matter that will be returned to in the main issues section of this Planning Statement.

#### *Public Consultation*

5.19. In the light of the Covid-19 pandemic, and the restrictions on face-to-face interactions and events, in connection with the previous application WA/2021/01365, the applicant ran an on-line public consultation event, which went live on 17<sup>th</sup> November 2020. Residents were alerted to this online consultation via a Royal Mail delivered letter sent to 1,130 local homes and businesses close to the Andrews site.

5.20. In total, the consultation website was viewed by 443 people and generated 38 feedback responses.

5.21. The key themes that were raised via the consultation exercise were as follows:

- Need for the care home
- Level of car parking
- Design
- Access
- Affordable housing
- Community building
- Infrastructure

5.22. In terms of addressing the points raised in the consultation, these matters were dealt with in detail as part of the planning submission for the application, and continue to be relevant to the current application. In summary, the points raised are addressed as follows:

- Need for the care home. Section 7<sup>1</sup> and Annex 1 confirm the need for this care home.

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<sup>1</sup> Planning Statement paragraphs 7.10 -7.20

- Level of car parking. The level of car parking proposed within the scheme has been agreed with Surrey County Council Highways and is consistent with their standards and is sufficient to accommodate the needs of staff as well as visitors. This is further confirmed in the supporting Transport Statement.
- Design. The design of the care home has been discussed, agreed and welcomed by the Council's urban designer. Furthermore, the proposal in terms of the appearance of the building is a significant improvement on the existing and its relationship with the immediate surrounding area. Noting the reason for refusal in connection with WA/2021/01365 however, this revised application has made further adjustments to the design and materials of the proposed care home to respond to the concerns raised by Members during the decision-making process.
- Access. The proposed access has been agreed with Surrey County Council Highways Department.
- Affordable housing. In respect of affordable housing, NPPF, paragraph 64b, confirms that care homes do not trigger the provision of affordable housing. In addition, the location of the site within the 400m SPA buffer zone confirms that such affordable housing would not be acceptable.
- Community building. If there is an aspiration for a community building this would be better located within the centre of Hindhead, not on the application site. In any event, the proposed care home provides a form of a community facility in meeting the needs of the local elderly population and should be viewed as a further helpful addition to the community's infrastructure assisting from a social as well as an economic perspective.
- Infrastructure. Finally, in respect of infrastructure, Thames Water will be a statutory consultee for the application. Matters concerning foul drainage and water capacity will be addressed. Furthermore, as confirmed in Section 7 of this statement, the demands on the local GP practises and the NHS will be reduced because of the care home.<sup>2</sup>

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<sup>2</sup> See Planning Statement paragraphs 8.59-8.65

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### New Application Pre-Submission Engagement

- 5.23. Following the determination of the previous care home planning application, a meeting took place with Officers and Members of the Council to understand in more depth their concerns regarding the design of the proposed care home. Following this meeting, a set of different design options were put to the Council for comment. The feedback suggested an alternative design to the refused scheme that complemented the local vernacular and use and colours of external surface materials found in the Hindhead area. It was felt that this alternative proposal would sit more comfortably within the street scene and local area and could be supported.
- 5.24. The preferred designs are the ones submitted with this revised planning application.
- 5.25. No alterations were required to the siting or scale of the building by comparison to the refused scheme. Accordingly, these elements of the proposals remain the same as the earlier application.
- 5.26. A further round of public consultation occurred prior to the submission of this new application. The details and outcomes of this are recorded in the submitted Statement of Community Involvement.

### *Summary*

- 5.27. In response to feedback through the pre-application process, the scheme design has been through a process of evolution. This is documented in the Design and Access Statement, and illustrates the changes made to the scheme as a result of feedback received.
- 5.28. The feedback provided through the pre-application and public consultation processes has enabled matters raised to be addressed in this Planning Statement, supported where necessary by specialist technical reports which set out the detailed analysis of, and response to, these issues.

## 6. LOCAL AND NATIONAL PLANNING POLICY CONTEXT

- 6.1. This section of this Statement sets out the local and national planning policy context in respect of the need for specialist accommodation for older people.
- 6.2. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan, against which the application proposal will be determined, comprises the Waverley Borough Local Plan, Part 1 (WBLP Part 1), which was adopted in 2019, and the 'saved' policies of the Waverley Borough Local Plan 2002 (WBLP).
- 6.3. The key development plan policies against which the application should be considered are set out below:

Waverley Borough Local Plan, 2019 (WBLP)

Policy SP1 – Presumption in favour of Sustainable Development

Policy SP2 – Spatial Strategy

Policy ST1 – Sustainable Transport

Policy AHN3 – Housing Types and Size

Policy EE2 – Protecting Existing Employment Sites

Policy TDS3 – Neighbourhood and Village Shops

Policy TD1 – Townscape and Design

Policy LRC1 – Leisure and Recreation Facilities

Policy NE1 – Biodiversity and Geological Conservation

Waverley Borough Local Plan 2002

Policy IC2 – Safeguarding Suitably Located Industrial and Commercial Land

Policy D4 – Design and Layout

- 6.4. Policy SP1 of the WBLP states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development as set out in the NPPF. Policy SP2 seeks to maximise opportunities for the redevelopment of suitable brownfield sites for housing, business or mixed use.

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- 6.5. Policy ST1 sets out the requirements in connection with delivering 'sustainable transport' in association with development proposals, including the provision of on-site cycle parking, the preparation of Transport Assessments and Travel Plans, and making appropriate provision for car parking in accordance with local standards.
- 6.6. Policy AHN3 sets out that the housing needs of older people (aged 65 or over), specifically those with dementia or specialist needs, should be recognised. The SHMA that informed the drafting of the Local Plan policies identified a need for 1,700 additional specialist housing solutions. Moreover, Policy AHN3 specifically states that the Council will support the provision of new housing and related accommodation to meet the needs of specific groups that are identified within the SHMA, including older people.
- 6.7. Policy EE2 (Protecting existing employment sites) of the WBLP Part 1 sets out that the Council will permit the change of use of existing employment sites to residential and other alternative uses where it can be clearly demonstrated that there is no reasonable prospect of the site being use for employment uses; this includes those specifically identified under saved Local Plan Policies IC2 and IC3. The site is not notated on the Policies Map as falling under either IC2 or IC3. Nevertheless, in considering the previous application for the site, the Council considered relevant, and therefore applied, the provisions of Policy IC2 of the saved Local Plan. This states that the loss of suitably located industrial and commercial land will be resisted.
- 6.8. Policy TCS3 of the WBLP Part 1 sets out that the Council will resist the loss of shops and services which are deemed to be important to the community, and proposals for the loss of shops will need to demonstrate that continuing in this use is unviable.
- 6.9. Policy LRC1 of the WBLP Part 1 notes that development that involves the loss of indoor leisure facilities will be granted if the use is no longer required, and no other leisure provision is required in the area.
- 6.10. Policy TD1 sets out the sets out the policy framework to ensure that the character and amenity of the Borough is protected, supplemented by saved Policy D4 (Design and Layout).
- 6.11. Policy NE1 (Biodiversity and Geological Conservation) enables development to be permitted provided that it retains, protects and enhances features of biodiversity

interest, and ensures that any adverse impacts are avoided, or if unavoidable, appropriately mitigated.

#### *Waverley Local Plan Part 2*

- 6.12. The Council consulted on the pre-submission draft Waverley Local Plan Part 2 in late 2020 and early 2021, with the consultation closing on 29<sup>th</sup> January 2021. The Part 2 Local Plan provides the more detailed 'Development Management' policies and includes site allocations for housing and other land uses.
- 6.13. The Housing Numbers Assessments and Allocations Topic Paper that supports the Pre-Submission Local Plan Part 2 restates the requirement in Local Plan Policy ALH1 to deliver 990 net new residential units as a minimum housing target in Haslemere between 2013 and 2032. "Haslemere" includes the settlement of Hindhead. As of 1st April 2020, within Haslemere, there were 218 housing completions and 299 outstanding permissions, with windfalls expected to deliver a further 153 dwellings. This total of 670 committed dwellings means that there remains a requirement to allocate land for 320 additional dwellings in the Local Plan Part 2 within the Haslemere area.
- 6.14. Paragraph 2.28 of the Topic Paper notes that Haslemere Town Council and the local community have expressed a clear preference that wherever possible, the Council should only allocate sites within the existing settlement of Haslemere, or on brownfield sites. Paragraph 2.29 of the Topic Paper goes on to note that, in recognition of the requirement of the National Planning Policy Framework (NPPF) to make effective use of land, the Council has reviewed all the urban and brownfield sites proposed for allocation to increase yields wherever possible. Notwithstanding this, it has still been necessary to allocate a greenfield site for C3 residential development in Haslemere on land at Red Court, Scotland Lane, for 50 units.
- 6.15. Policy DS 03 Land at Andrews, Portsmouth Road, allocates the site for a 67-bed high dependency care home, subject to retention and enhancement of mature trees and other landscape features wherever possible, and the demonstration that development will not have a likely significant effect on protected habitats sites. An extract from the pre-submission Local Plan, setting out the allocation for a care home on the Andrews site, is reproduced below.

**DS 03: Land at Andrews, Portsmouth Road, Hindhead**

Land at Andrews as identified on the Policies Map is allocated for a 67 bed **high dependency** care home, equivalent to 35 additional dwellings, subject to:

- a) Retention and enhancement of mature trees and other landscape features wherever possible.
- b) The demonstration that development will not have a likely significant effect on protected **habitats sites**.

Size	0.55 ha	Existing use	Mixed
LAA ID	145	Approximate density	70 dph

- Key Constraints:
- Wealden Heaths I Special Protection Area 5 Km zone
  - Wealden Heaths II Special Protection Area 400m / 1 Km zone
  - East Hants Special Protection Area 5 Km zone
  - Source Protection Zone 3

Description: The site is currently used for a mixture of uses, including: offices, residential, industrial workshops, retail, leisure and storage. The majority of the site is located within the 400m buffer zone of the Wealden Heaths II Special Protection Area (SPA). As a result, to ensure the integrity of the SPA is not harmed by a proposal, it is considered that redevelopment of the site from its current mixed use to a high dependency care home would be suitable.



6.16. The Part 2 Local Plan was submitted to the Secretary of State for examination in December 2021.



National Planning Policy Framework

6.17. The National Planning Policy Framework (NPPF) is also a relevant material consideration in assessing the application. The NPPF is underpinned by a presumption in favour of sustainable development, with three overarching, but interlinked objectives. Paragraph 8 (a) of the National Planning Policy Framework (NPPF) sets out the economic objective associated with the delivery of sustainable development:

**“...to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity...”**

6.18. Similarly, paragraph 8 (b) of the NPPF sets out that the social objective of sustainable development:

**“...to support strong, vibrant and healthy communities, but ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.”**

6.19. The proposal will help to deliver both of these objectives, thereby responding to the requirement in paragraph 10 of the NPPF that development is pursued in a positive way, reflecting the presumption in favour of sustainable development which sits at the heart of the Framework.

6.20. Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development. Paragraph 11 (c) notes that development proposals that accord with an up-to-date development plan should be approved without delay.

6.21. Paragraph 35 of the NPPF sets out that development plans should be positively prepared, therefore providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs. Local authorities should therefore plan to meet, and ensure delivery to meet that need, of sites to address the accommodation needs of older people.

- 6.22. Paragraph 60 is clear that the Government's objective is to boost significantly the supply of homes, and in doing so, ensuring that the needs of groups with specific housing requirements are addressed. As established by paragraph 62 of the NPPF, this notes that the housing needs of older people should be assessed and reflected in planning policies.
- 6.23. Paragraph 61 of the NPPF is clear that, in the light of the objective to significantly boost the supply of housing, the standard methodology for assessing housing need, for all sectors of the population including older people, determines the minimum number of new homes needed. The housing need figure is not therefore a maximum, or ceiling figure, for the number of new homes required.
- 6.24. Paragraph 62 notes that the needs of different groups in the community should be assessed and reflected in planning policies, including the needs of older people.
- 6.25. Paragraph 65(b) makes it clear that affordable housing is not expected to be provided in major development for the provision of housing where the scheme provides purpose-built accommodation for the elderly.
- 6.26. Paragraph 81 requires significant weight to be placed on the need to support economic growth and productivity.
- 6.27. Paragraph 92 of the NPPF sets out that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction. In terms of paragraph 92 of the NPPF, the recent national health crisis has added new meaning to this paragraph, and it is clear that specialist accommodation for older people enables social interaction to happen in a safe place where isolation can be tackled, but in an environment that manages infection control, such that older people are not neglected or put at undue risk in times of national crisis such as the recent Covid-19 pandemic.
- 6.28. With regard to promoting sustainable transport, paragraph 111 of the NPPF states that:

**“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts of the road network would be severe.”**

6.29. Paragraph 119 of the NPPF seeks the promotion of an effective use of land in meeting the need for homes. Paragraph 120 gives substantial weight to the value of using suitable brownfield land within settlements. In addition, Paragraph 124 goes on to note that planning policies and guidance should support development that makes efficient use of land, taking into account a) the identified need for different types of housing, and b) local market conditions and viability.

6.30. With regard to achieving appropriate densities, the NPPF states at paragraph 125 that:

**“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.”**

6.31. Relevant also to the proposal, given that Waverley is affected by Green Belt designation, paragraph 139 of the NPPF states that:

**“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”**

6.32. The Glossary in the NPPF sets out a definition of ‘older people’:

**“People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and those whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support care needs.”**

National Planning Practice Guidance

6.33. National Planning Practice Guidance provides additional advice on implementing the NPPF, and of relevance to the care home element of this proposal, states at paragraph 001 Reference ID: 63-001-20190626 that:

**“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. In mid-2016 there**

**were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. 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 to reduce costs to the social care and health systems...”** (My underlining)

6.34. This represents a nationally acknowledged future exponential growth in the 85+ age cohort.

6.35. Paragraph 010 Reference ID: 63-010-20190626 refers to the different types of specialist housing for older people. The proposal falls within the description of residential care homes and nursing homes:

**“These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.”**

6.36. In respect of how the use classes order applies to specialist housing for older people, Paragraph 014 Reference ID: 63-014-20190626 states that:

**“It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”**

6.37. The NPPG is clear that the provision of specialist housing for older people should count against local a Local Authority’s housing requirement, with Paragraph: 016 Reference ID: 63-016-20190626 stating:

**“Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data.”**

6.38. In the light of the information presented in this Planning Statement, it is clear that this care home proposal falls within in Use Class C2, given the high level of care to be

offered, the individual bedroom en-suite facilities, and the scale of communal facilities incorporated into the scheme.

- 6.39. In terms of determining the equivalent contribution of care home bedrooms to meeting a Council's housing need, the July 2018 Housing Delivery Test Measurement Rule Book sets out a conversion rate of 1.8. Therefore, the number of bedrooms should be divided by 1.8 to calculate the equivalent number of C3 residential units that the proposal represents. This is the equivalent delivery in terms of contributing to a Council's housing land supply, and for a 74-bed care home, would be equivalent to 41.1 C3 units, rounded down to 41. This is discussed further in the section of this Planning Statement that deals with the need for care homes.
- 6.40. In respect of design matters, NPPG paragraph reference 001 Reference ID: 26-001-20191001, makes it clear that the National Design Guide can be used by all those involved in shaping places including in plan-making and decision making. It sets out the ten characteristics of well-designed places.
- 6.41. In respect of built form, the Guide notes that well-designed places have compact forms of development that are walkable, contributing positively to well-being and placemaking. In particular, paragraph 64 notes that:

**“Well-designed new development makes efficient use of land with an amount and mix of development and open space that optimises density. It also relates well to and enhances the existing character and context.”**

- 6.42. In summary, it is clear that the local and national policy context provides a clear framework to demonstrate need, and provide the parameters for, specialist accommodation for older people. The next section of this Statement looks in more detail at the need for care homes.

## 7. THE NEED FOR CARE HOMES AND THE BENEFITS ARISING

- 7.1. By way of context, there is some national evidence that affirms the need to provide specialist accommodation to meet the needs of older people, and the commensurate benefits that this brings. These benefits are highlighted here and present material considerations in the determination of the planning application. They also feature in the planning balance but reinforce the importance and benefits that arise from the proposed development.

### *'All the Lonely People: Loneliness in Later Life'*

- 7.2. In September 2018, Age UK published a report<sup>3</sup> seeking to understand the circumstances associated with feeling lonely, and how to support people in tackling such feelings in older age. This identified the fact that the circumstances that lead to feeling 'lonely' in life increase as people become older. Whilst the proportion of older people who feel lonely has remained relatively constant, there is an overall increase in numbers of 'lonely' people as the older population grows.
- 7.3. The feelings of loneliness can be tackled by social activities, supported by effective emotional and practical support to access them, particularly when set in a welcoming and safe communal environment that provides a holistic approach to addressing that loneliness. This is where specialist accommodation for older people can have an important role to play.

### *'Homes for Later Living: Healthier and Happier Report'*

- 7.4. The Home Builders' Federation (HBF) published a report dated September 2019<sup>4</sup>, which reviewed the fiscal and well-being benefits of building more homes for later living. This identified the key differences between new-build housing for older people and new-build mainstream housing as provision of extensive communal areas for socialising and hosting visitors, and an on-site manager or team with the role of looking out for people's welfare, and ensuring the facilities are well-maintained. These typically

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<sup>3</sup> All the Lonely People: Loneliness in Later Life, Age UK, September 2018

<sup>4</sup> Homes for Later Living: Healthier and Happier Report, Home Builders' Federation, September 2019

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manifest in two types of housing offer; Retirement Living, with communal lounges and other facilities, and Housing with Care (care homes) or Extra Care, where support can respond to increasing care needs.

7.5. The Report identified that by 2032, there will be five million people over eighty living in the UK, rising from 3.2 million based on the 2018 ONS population estimates (representing an increase of 56%). However, as the number of older people in the UK increases, the supply/demand gap is increasing. Older people living in unsuitable accommodation are drawing resources unnecessarily from the NHS and Local Authorities. The HBF research that informed the report showed that:

- Each person living in a home for later living enjoys a reduced risk of health challenges, relating to mobility problems, falls, difficulties in keeping a home warm and the consequent health issues arising, and social isolation, which can lead to depression, dementia and other chronic illnesses. Together, reducing these health challenges contributes to fiscal savings to the NHS and social care services of approximately £3,500 per year per person;
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year;
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.

#### 'Too Little, Too Late'

7.6. The ineffectiveness of the planning system to deliver accommodation to meet older people's housing needs is borne out in a recent publication, 'Too Little, Too Late', June 2020<sup>5</sup>, which concludes that only 9.7% of Local Plans contained clear policies on retirement housing and care homes, showing the number of dwellings or care home beds required, how this would be achieved, and site requirements. This is against a

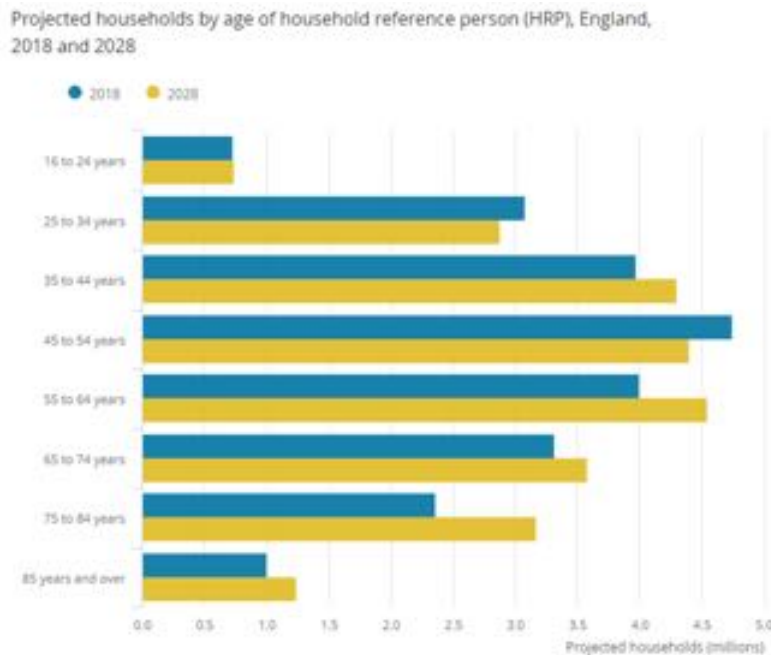
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<sup>5</sup> Too Little, Too Late, June 2020, prepared by Professor Les Mayhew and published by the Centre for the Study of Financial Innovation (CSFI)

national backdrop whereby there is a baseline 750,000 retirement homes in the UK, which only represents 2.6% of the total housing stock and only 9.4% of households aged 65+. Around 7,000 new retirement properties have been added annually since 2010; however, this compares with a rise of 145,000 in the number of 65+ households each year, further increasing the shortfall rather than ever beginning to close the gap.

Household projections for England: 2018-based (release date 29 June 2020)<sup>6</sup>

7.7. The household projections for England: 2018-based, released in June 2020, predict that the number of households in England is projected to increase by 1.6 million between 2018 and 2028. The growth in households is weighted significantly towards those of older age; 64% of the total growth in households – equivalent to 1,024,000 households – is accounted for by those where the ‘household reference person<sup>7</sup>’ (HRP) is aged 75 years or over. The number of people aged 75 years and over and living on their own is projected to increase by 461,000 between 2018 and 2028. This is illustrated visually on the chart below:



Source: Office for National Statistics – Household Projections

<sup>6</sup> Information sourced from ONS data release 29 June 2020: Household projections for England: 2018-based

<sup>7</sup> The eldest economically active person in the household, then the eldest inactive person if there was no economically active person



7.8. This illustrates the fact that the largest projected percentage growth in households in the 10 years to 2028 occurs at the oldest ages. The number of households where the HRP is aged 75 to 84 years is projected to increase by 35.4%, reaching nearly 3.2 million by 2028. Households with HRPs aged 85 years and over are also projected to increase markedly over the same period, growing by 24.1%; thus, households with an HRP aged 75 years or over account for 64.2% of the total growth in households between 2018 and 2028. Driving this change is the fact that the number of people aged 75 to 84 years in England is projected to increase by 33.9% and aged 85 years and over by 22.8%. This change in projected households by age of household reference person is summarised in the table below:

**Table 1: Projected households by age of household reference person, England, 2018 to 2028**

Age of HRP	Mid-2018	Mid-2028	Total change 2018 to 2028	Average annual change 2018 to 2028	Percentage change 2018 to 2028
16 to 24 years	732,000	735,000	3,000	300	0.4
25 to 34 years	3,082,000	2,882,000	-200,000	-20,000	-6.5
35 to 44 years	3,974,000	4,300,000	326,000	32,600	8.2
45 to 54 years	4,747,000	4,395,000	-352,000	-35,200	-7.4
55 to 64 years	4,002,000	4,547,000	545,000	54,500	13.6
65 to 74 years	3,311,000	3,576,000	265,000	26,500	8.0
75 to 84 years	2,355,000	3,168,000	813,000	81,300	34.5
85 years and over	1,000,000	1,241,000	241,000	24,100	24.1

Source: Office for National Statistics - Household Projections

7.9. The statistics provided by the most up-to-date household projections present a stark message in terms of the need to ensure that housing delivery aligns with population demographics to ensure that the supply of housing meets all sectors of the population, including, as required by paragraph 61 of the NPPF, the housing needs of older people. The evidence that there needs to be a significant and sustained boost in the supply of such accommodation is reinforced unequivocally by these ONS 2018-based household projections as released on 29 June 2020.

Meeting an established C2 care home need: Waverley's position

- 7.10. Waverley's Authority Monitoring Report 2019 (published in 2020) does not offer any analysis of the delivery of specialist accommodation to meet the needs of older people.
- 7.11. However, the Strategic Housing Market Assessment, which was published in 2015, notes at paragraph 9.20 that the housing market area is expected to see a notable increase in the older person population with the total number of people aged 65 and over expected to increase by 48% over the 20-years from 2013. This compares with overall population growth of 14% and growth in the Under 65 population of just 6%.
- 7.12. In addition, paragraph 9.46 goes on to state that:
- “The demographic modelling indicates that in 2033 there will be 4,377 people aged 75 and over living in ‘institutions.’ These people do not fall within the household population. On the basis of current supply this would suggest a potential additional need for 1,031 care home bedspaces over the 20-years to 2033 (52 per annum).”**
- 7.13. The SHMA goes on to note at paragraph 9.47 that for individual Authorities, the growth in the institutional population aged 75 and over compared with supply in the 2013-33 period is estimated to be 242 in Guildford, 396 in Waverley and 393 in Woking.
- 7.14. Against this background therefore, the draft submission Local Plan Part 2 allocates the Andrews site for a care home in C2 use, to help meet the identified gap between future growth in demand, and supply of specialist accommodation. This is within the context of the recognition in NPPG that these needs are ‘critical’, and in paragraph 62 of the NPPF that the housing needed for different groups in the community, including older people, should be assessed and reflected in planning policies.
- 7.15. The existing planning policy framework offers a presumption in favour of development within defined settlement boundaries, of which Hindhead is one, where it meets the policy framework set by the development plan and the NPPF. The principle of redeveloping the Andrews site for a care home is established through its allocation for such a use in the emerging Part 2 Local Plan. It follows therefore, that the principle of

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the use of the site for a care home is accepted, and in fact necessary, in order to meet existing and future accommodation needs for older people.

- 7.16. This approach is set in a national context whereby the population is ageing, and the proportion of older people is predicted to increase exponentially. This is reflected in the NPPG updates of July 2019, which, as set out in Section 6 of this Statement, affirm that planning to meet the accommodation needs of older people is **critical**, with population projections demonstrating a doubling of the population over 85 between 2016 and 2041, leading to a significant increase in demand nationally for such accommodation over at least the next 15 years.
- 7.17. In this context of a significant national increase in the need for specialised care home accommodation, significant weight should be afforded to the benefits associated with the provision of C2 care home bed spaces in the overall planning balance, on sites that are policy compliant in terms of their location within defined settlement boundaries where the principle of such development is deemed acceptable – as is the case with the Andrews site.

*Meeting an established C2 care home need: The Care Home Operator's position*

- 7.18. This application is operator led. Accordingly, if there was not a need for the proposed care home, the application would not be supported by an operator who intends to invest millions of pounds developing the care home unless they were confident that a need exists. This position is confirmed in the operator's statement which is reproduced as Annex 1 to this statement.
- 7.19. The Annex confirms that there is a significant shortfall in appropriate care home bedrooms, in particular from a qualitative perspective which is so important having regard to the recent challenges and lessons from the COVID-19 pandemic. Hamberley's assessment of supply and demand confirms:

**“There are 25 care homes within the defined catchment area providing 836 ‘ensuite’ bedrooms. Of these bedrooms only 347 have ensuite wet room facilities which allow residents to bathe within their own rooms. The remaining 489 ensuite bedrooms within the catchment area provide solely ensuite WC facilities but no shower or bathing facilities within the**

rooms. This means that these residents have to share bathing facilities with up to 8 other residents (on average).

Hamberley's analysis of need for the new care home is based on the assessed need for ensuite wet room bedrooms. As can be seen from the analysis table below (Figure 1) prepared by leading care home sector specialists Carterwood, there is a demonstrable shortfall of ensuite wet rooms within the catchment."

#### ***COVID-19 and Changing Dynamic of UK Care Homes***

"Covid-19 is already changing the way people choose care homes with potential residents looking at infection control measures within care homes when making their purchase decision, and specifically the desire to have one's own ensuite washing and toilet facilities. 75% of care home beds in the UK do not have ensuite wet rooms and therefore in the vast majority of cases this means elderly care home residents are having to share a bathroom with up to 8 other residents. The ability for individuals to bathe within their own rooms is a vital preventative measure that helps reduce the spread of infection within a care home as well as allowing residents to maintain their dignity.

The ability to isolate residents for their safety and others and ensure that people have enough space to practice social distancing, has been a key focus area during the pandemic and these two factors are inherent in the design of a future proof Hamberley care home. There has been a clear pattern and evolution of bedroom design over the last 40 years moving from small, confined spaces without washing facilities to the proposed site which includes modern, spacious en-suite wet rooms.

The result of the pandemic is the likely acceleration in the obsolescence of older care home stock inside which it will become harder to combat infection and meet increasingly stringent regulatory standards.

The analysis table above (Figure 1) assumes that all of the existing care home stock currently within the catchment area remains in place and operative despite the fact that average age of these homes is 23 years. Of these homes 9 are more than 30 years old."

- 7.20. It is clear that there is a qualitative need for new, modern, purpose built 21st century fit for purpose care homes in the Hindhead area. The application scheme will deliver this in an exceptionally high-quality facility that can only be of benefit to the local area and its community.

### *General Housing need in Waverley*

- 7.21. The most recent five-year housing land supply position is set out in a recent appeal decision (APP/R3650/W/21/3278196 Land west of Loxwood Road, Alford, Surrey, GU6 8HN dated 11<sup>th</sup> January 2022). This confirms a land supply of 4.01 years, a deficit of 885 dwellings. This is significant.
- 7.22. Given the above together with the nationally established need for a significant increase in housing stock to meet growing needs across all sectors of the community, the NPPF requires Councils to support the Government's objective of boosting significantly the supply of homes.
- 7.23. If the Council is unable to demonstrate a 5YHLS, the presumption in favour of sustainable development would apply by virtue of paragraph 11 d) footnote 7, due to the absence of a five-year housing land supply. However, the application site does fall within 400m of designated nature conservation sites and is therefore subject to footnote 6 constraints. Notwithstanding this, this matter has been addressed in consultation with Natural England, such that the proposal would not have a significant effect on the land designated for its nature conservation value – see the main issues section of this Planning Statement. Accordingly, in the event of any development plan conflict arising NPPF Paragraph 11 d) remains engaged. This means that if any adverse impacts were to be identified through the consideration of the application scheme, these would have to significantly and demonstrably outweigh the benefits of the proposal, when assessed against the policies in the NPPF taken as a whole.
- 7.24. The Council is progressing with the preparation of the Waverley Local Plan Part 2, which sets out allocations for the delivery of new homes.
- 7.25. As noted in section 6 above, the Housing Numbers Assessments and Allocations Topic Paper that supports the Pre-Submission Local Plan Part 2 restates the requirement in Local Plan Policy ALH1 to deliver 990 net new residential units as a minimum housing target in Haslemere between 2013 and 2032. "Haslemere" includes the settlement of Hindhead. As of 1st April 2020, within Haslemere, there were 218 housing completions and 299 outstanding permissions, with windfalls expected to deliver a further 153 dwellings. This total of 670 committed dwellings means that there remains a

requirement to allocate land for 320 additional dwellings in the Local Plan Part 2 within the Haslemere area.

- 7.26. Paragraph 2.28 of the Topic Paper notes that Haslemere Town Council and the local community have expressed a clear preference that wherever possible, the Council should only allocate sites within the existing settlement of Haslemere, or on brownfield sites. Paragraph 2.29 of the Topic Paper goes on to note that, in recognition of the requirement of the National Planning Policy Framework (NPPF) to make effective use of land, the Council has reviewed all the urban and brownfield sites proposed for allocation to increase yields wherever possible. Notwithstanding this, it has still been necessary to allocate a greenfield site for C3 residential development in Haslemere on land at Red Court, Scotland Lane, for 50 units. In this context, maximum use should be made of previously developed land on sites such as Andrews, to ensure that the contribution that these sites make to housing land supply in Waverley is optimised.
- 7.27. Moreover, there are a significant number of benefits that would arise from the implementation of the care home scheme, and these are considered sufficient to outweigh any harm. This Statement goes on to set out these significant benefits, not only in meeting a specialist housing need for older people, which is currently not being met or planned for (discussed below), but also helping to meet housing needs in an area highly constrained by the existence of Green Belt, the Surrey Hills AONB and nature conservation designations. These benefits are set out in more detail in the main issues section of this Statement.
- 7.28. In summary, in the context of local and national planning policy, as set out in Section 6 of this report, as well as the particular evidence regarding care home needs set out in this section, with the nationally and locally acknowledged future exponential growth in the 85+ age cohort in the forthcoming period to 2032, the need to support the documented increase in demand for dementia bedspaces, and the significant need locally for purpose built, high quality fit for purpose care home accommodation, all policy compliant opportunities to provide specialist accommodation for older people should be supported.
- 7.29. NPPG is clear that C2 residential uses contribute to meeting a Council's housing land supply. In the light of the allocation of this site for a care home in the emerging Part 2 Local Plan, in the context of all the above factors, significant weight in the planning

balance should be afforded to the provision of a 74-bedroom care home accommodation on the site, to help to meet these identified specialist housing needs.

- 7.30. As noted above, the July 2018 Housing Delivery Test Measurement Rule Book sets out a conversion rate of 1.8. A 74-bed care home would therefore deliver the equivalent of 41 units of C3 residential accommodation (rounded down) in terms of a contribution towards housing land supply.
- 7.31. There is an established need for specialist accommodation to meet care needs, as demonstrated above. In the ordinary unweighted planning balance, the proposal accords with the development plan, and planning permission should be granted without delay. However, in the event that some adverse impacts are identified, these should be set against the significant and material benefits that would arise from the provision of the care home. These are discussed in the Main Issues section of this Planning Statement below.

## 8. MAIN ISSUES

### Principle of development

8.1. Matters relating to the principle of the delivery of a care home on the Andrews site are dealt with in this section under the following headings:

- 1. Redevelopment of the site for a C2 care home
  - *Development within defined built up areas*
  - *Housing for older people*
  - *Special Protection Areas*
- 2. Loss of existing employment, retail and leisure uses

#### **1. Redevelopment of the site for a C2 care home**

8.2. The principle of the proposal for the provision of a C2 care home use is threefold.

##### *a. Development within defined built up areas*

8.3. Firstly, the application site falls within the defined urban area of Hindhead. The starting point should therefore be that its redevelopment and re-use, as a brownfield site, would make effective use of land, in accordance with development plan Policies SP1 and SP2. Policy SP2 of the Local Plan Part 1 sets out that the spatial strategy seeks to maximise opportunities for the redevelopment of brownfield sites. As the site lies within the built-up settlement of Hindhead, and would represent previously developed land, there can be no doubt as to the acceptability of principle of development in these planning terms.

8.4. This is reinforced by the requirement to do so as set out in paragraph 119 of the NPPF. Moreover, NPPF paragraph 120 (c) sets out that “substantial weight” should be afforded to the value of using suitable brownfield land within settlements for homes (which includes C2 accommodation to provide ‘homes’ for older people).



*b. Housing for older people*

- 8.5. Secondly, Policy AHN3 (Housing Types and Size) of the WBLP Part 1 sets out that the housing needs of older people (aged 65 or over), specifically those with dementia or specialist needs, should be recognised. Moreover, Policy AHN3 specifically states that the Council will support the provision of new housing and related accommodation to meet the needs of specific groups that are identified within the SHMA, including older people. This reflects the requirement in paragraph 62 of the NPPF that Local Authorities should plan to meet the needs of different groups in the community, including older people.
- 8.6. The provision of a C2 care home would therefore contribute to helping to meet the provision of accommodation for older people, for which there is a recognised and evidenced need in Waverley Borough<sup>8</sup>, and, in particular, for those living with dementia. The proposal would therefore support the aims of Policy AHN3 of the WBLP Part 1, corroborated further by its allocation in the draft submission Local Plan Part 2 such that the principle of the acceptability of the proposed C2 care home scheme on this site should be accepted as in accordance with development plan policy and national guidance.
- 8.7. Such allocations are important to avoid a situation whereby there is a vacuous policy framework in relation to the delivery of C2 care home uses, where in the absence of specific allocations for care homes in a Local Plan, the policy framework does not readily enable their provision. Without specific allocations, there is an unintended consequence of effectively prioritising traditional C3 market housing on available and suitable sites by virtue of the fact that Local Plan policy does not require a specific proportion of the provision of residential uses on allocated sites to include other types of specialist residential accommodation such as care homes.
- 8.8. This ineffectiveness of the planning system to deliver accommodation to meet older people's housing needs is borne out in a recent publication, 'Too Little Too Late', June 2020, which concluded that only 9.7% of Local Plans contained clear policies on

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<sup>8</sup> Section 7 and Annex 1

retirement housing and care homes, showing the number of dwellings or care home beds required, how this would be achieved, and site requirements. This is against a national backdrop whereby there is a baseline 750,000 retirement homes in the UK, representing 2.6% of the total housing stock and only 9.4% of households aged 65+. Around 7,000 new retirement properties have been added annually since 2010; however, this compares with a rise of 145,000 in the number of 65+ households each year, increasing the shortfall rather than ever beginning to close the gap.

- 8.9. In this context, the principle of the provision of a C2 care home scheme of the nature proposed under would contribute to helping to meet the provision of accommodation for older people, and indeed, would deliver the allocation established in the emerging Local Plan Part 2. This requirement is established within the terms of the national planning policy framework, which sets out at paragraph 62 that the needs of different groups in the community, including older people, should be assessed and reflected in planning policies.
- 8.10. This context underpins the draft allocation on the site for a C2 care home, its importance and weight to be attached to it.
- 8.11. The principle of the acceptability of the proposed C2 care home scheme on this site should be accepted as in accordance with development plan policy and national guidance. Whilst the redevelopment of the site for the care home would result in the loss of two existing residential units, the delivery of the care home, using the Housing Delivery Test conversion ratio of 1.8, would deliver the equivalent of 41 newly available dwellings, net 39 when taking account of the loss of the two existing units. As acknowledged in the Council's determination through the single issue design reason, given that the scheme would deliver a care home providing residential accommodation, the loss of the existing dwelling is considered acceptable. In addition, in the light of clear national need for accommodation to meet older people's housing needs, significant weight should be given to meeting an identified and growing need for accommodation for older people that remains unmet.

*c. Special Protection Areas*

- 8.12. Thirdly, the application site lies within the Wealden Heaths I Special Protection Area (SPA) 5km Buffer Zone, the Wealden Heaths II SPA 400m Buffer Zone and the East Hants 5km SPA Buffer Zone.
- 8.13. Notwithstanding the location within the defined built-up area, the site is located within the 400m Buffer Zone of the Wealden Heaths II SPA within which a net increase in C3 housing units is precluded as it is not considered possible to mitigate the potential adverse impacts arising from a net increase in C3 dwellings. Such impacts arise from increased recreational pressure on the SPA and cat predation. However, a C2 use such as the one proposed is acceptable by virtue of the nature of the operation, whereby the care home provides 24-hour care for elderly and infirm residents with limited mobility, also suffering from conditions such as dementia. As a result, those living in the care home will not be able to leave the care home independently and will not be predisposed to undertake activities such as going for walks, cycling or jogging, which are the activities identified as having a potential impact on the integrity of the nature conservation status of the SPA sites due to the recreational impact.
- 8.14. The care home grounds will be landscaped and secured to ensure that residents cannot leave the care home without being accompanied as a matter of safety for those residing at the care home. In this context, the residents will not be physically fit or able to leave the site to visit or walk on the SPA. It is therefore the case that the proposal would not result in any recreational disturbance on the SPA sites and would not therefore contribute to any 'in combination' effect arising from net new development.
- 8.15. In this context, to corroborate the acceptability of the C2 use within the 400m buffer zone, prior to the submission of this planning application, the applicant undertook a separate pre-application request to Natural England, through its Discretionary Advice Service. Through this process, Natural England has confirmed that, subject to the proposed conditions set out below, it would not raise an objection to the proposed care home thereby ensuring there would be no Likely Significant Effect (LSE) on the SPA:

- 1. The development hereby approved as a care home shall only be used as a Class C2 care home and be occupied solely by persons who are mentally and/or physically frail; have mobility problems; suffer from paralysis or partial paralysis; or are in the need for assistance with the normal activities**

**of life. The building shall not be used for any other purpose within Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended) or any other statutory instrument and notwithstanding any provisions either in force or enacted at a later date there shall be no permitted change of use. In addition, there shall be no self-contained or staff accommodation within the approved development and there shall be no dogs or cats at the premises at any time (other than assisted living dogs).**

**Reason: To ensure the integrity of the SPA is not harmed by the proposal in accordance with Policy NE1(i) of the Waverley Borough Local Plan Part 1: Strategic Policies and Sites, and the National Planning Policy Framework.**

- 2. Prior to commencement of development, a Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority to demonstrate how the public shall be prevented from using the car park other than in connection with the care home. The use of the car park shall be operated in accordance with the approved Parking Management Plan at all times.**

**Reason: To ensure that the integrity of the SPA is not harmed by the proposal and to ensure that the development does not prejudice highway safety nor cause a nuisance to highway users in accordance with the National Planning Policy Framework.**

- 8.16. Moreover, Natural England confirmed during initial discussion that these conditions would constitute a form of Appropriate Assessment under the Habitat Regulations, thus satisfying the relevant legislation. Natural England also confirmed that no payments towards SANG or SAMM would be required. A copy of the correspondence with Natural England is submitted as part of the documentation for this planning application. In addition, a draft Parking Management Plan has been prepared and submitted with this planning application.
- 8.17. Subject to these conditions being attached to the planning consent, the proposed C2 care home is therefore entirely consistent with the overarching aims of the Habitats Regulations that seek to ensure there are no adverse impacts on such designated wildlife sites. In conclusion, the proposed care home is an entirely acceptable use within the 400m SPA Buffer Zone, and this matter has already been accepted by Natural England. These points were also reconfirmed during the determination of the last application WA/2021/01365 by both Natural England and the Council.

## **2. Loss of existing employment, retail and leisure uses**

- 8.18. Policy EE2 (Protecting existing employment sites) of the WBLP Part 1 sets out that the Council will permit the change of use of existing employment sites to residential and other alternative uses where it can be clearly demonstrated that there is no reasonable prospect of the site being use for employment uses; this includes those specifically identified under saved Local Plan Policies IC2 and IC3. The site is not notated on the Policies Map as falling under either IC2 or IC3. Nevertheless, in considering the previous C3 residential application for the site, the Council considered relevant, and therefore applied, the provisions of Policy IC2 of the saved Local Plan.
- 8.19. As part of the application for the redevelopment of the site for an assisted living scheme in 2016<sup>9</sup>, no marketing information was submitted, rather, a viability report was provided that demonstrated that the configuration of the site, comprising a mixed use of buildings, offices, residential, industrial workshops, retail and storage, did not lend itself to an easy re-let for a commercial occupier. The diversion of passing trade due to the opening of the Hindhead Tunnel, and the dilapidated nature of the existing buildings, plus the requirement to make significant improvements to them under energy performance regulations, meant that the site did not readily offer itself to an alternative viable commercial use in the E classes. This continues to be the case.
- 8.20. It was accepted in connection with the 2016 application that in spite of the absence of any marketing information, there was no objection to the loss of the B-class employment use in relation to Policy IC2 of the saved Local Plan. The Officer's report noted that the loss of employment/retail was a disadvantage with the previous scheme. However, and in contrast, it is recognised that the C2 care home application is materially different and has significant (improved) employment generating characteristics, with a net increase in around 67 FTE jobs, such that this issue is converted into an advantage and complies with Policy EE2.
- 8.21. In the context of the 2021 and current planning applications, the operations on the site have evolved over time to meet the bespoke needs of the specific occupiers. The buildings do not therefore lend themselves readily to re-let for B-class uses, a position

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<sup>9</sup> Reference WA/2016/1833 (A C3 use)

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that has not changed since the previous application. Pre-application advice provided by the Council on this matter indicated that an updated report that considers the viability of the employment use may be sufficient. This application is therefore accompanied by a report prepared by Clarke Gammon, which addresses this matter.

8.22. In summary, the report confirms at paragraphs 4.1-4.3 that:

**“The buildings are dated and in poor condition and have been adapted overtime to suit Andrew at Hindhead’s business operation. We would not perceive that the existing layout would be suitable for many commercial operators, owing to the different range of buildings and the standard of construction and state of repair.**

**The accommodation is in a dilapidated condition with restricted height and access and would require a full upgrade/reconstruction in order to meet occupiers’ modern requirements.**

**There doesn’t appear to be an energy performance certificates for the property on the register but in our opinion that the industrial/workshop buildings would be below an E, given the condition and specification of the unit.”**

8.23. The report notes in this respect at 9.1.1 that:

**“The introduction of minimum energy performance standards, means landlords are unable to let or continue to let properties with EPC ratings of an F&G. We would anticipate significant capital investment in order to meet these standards.”**

8.24. Moreover, given the statement in Policy EE2 that, in considering proposals that are not consistent with the policy, the Council will take into account the extent to which the proposed new use will contribute to the economy, the later section of this part of this Planning Statement sets out the benefits of delivering a care home on the site. These demonstrate that there are a number of short and long term direct, indirect and induced economic benefits that would arise. The care home use is therefore an ‘economic’ re-use of the site, which would outweigh any loss of B class employment currently offered. In this context, it is considered that the requirements of Policy EE2 and Policy IC2 are satisfied, and that on this basis, there would be no objection to the loss of the B class employment use from the site. As an employment generating use, and one that will

result in a notable net increase the level of employment on the site, significant weight should also apply to the economic aspects of the care home scheme.

- 8.25. Policy TCS3 (Neighbourhood and Village Shops) supports small-scale facilities to meet local needs and sets out that proposals for the loss of shops will need to demonstrate that continuing in this use is unviable. The report prepared by Clarke Gammon provides evidence to demonstrate why the existing retail use is no longer viable, due in part to the poor condition of the buildings and the fact that the lack of passing trade since the opening of the Hindhead tunnel means that the premises are not commercially viable for a number of occupiers.
- 8.26. In respect of the personal training use (classD2) Policy LRC1 (Leisure and Recreation Facilities) of the WBLP Part 1 notes that development that involves the loss of indoor leisure facilities will be granted if the use is no longer required, and no other leisure provision is required in the area. The former hot tub sales (A1) element of the building was granted retrospective permission in 2018 for a change of use to a D2 (assembly and leisure) use to provide a small personal training studio. As acknowledged in the Officer's report for this change of use application, the completion of the A3 bypass has resulted in the location becoming quite challenging for retail, due to lack of passing trade.
- 8.27. The same circumstances have applied to the D2 personal training use. This comprised a small room with a single, very small, WC. The applicant has received confirmation that the gym operator has in fact ceased trading and the gym closed in March 2020 and has never reopened. The fitness business has since gone into liquidation. In the context of the current challenges for the indoor leisure industry arising from the Covid-19 pandemic, such a small unit was and remains unsuitable for a gym use due to the challenges of operating such a small unit whilst ensuring that health and safety and hygiene standards were/are adhered to. The operator could not make a business of the room, tried a number of alternative strategies, but none of them worked. They came to the conclusion that the building (room) was not commercially viable and therefore ceased trading. Put simply, the use evolved over time, was not a purpose-built facility and proved to be an unviable operation. Indeed, its closure confirms this. Notwithstanding this, the principle of the loss of the unit for a leisure use, and therefore of any health and well-being benefits associated with the use of this part of the building

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for personal training, are outweighed significantly by the suite of health and well-being benefits that would arise from the redevelopment of the site for a C2 care home, benefits that are detailed in the Planning Statement that accompanies the application.

8.28. Therefore, the loss of this small D2 element of the existing use is not considered to be material in the planning balance. This too was accepted in the determination of the last application, WA/2021/01365.

8.29. To conclude, it is clear that the location of the site and its condition render it no longer suitable for the existing commercial uses on the site. Their retention should not therefore be a requirement in the determination of this planning application. Moreover, the economic and employment generating characteristics of the proposed care home are such that this use, unlike a conventional C3 residential development, provides a sufficient and acceptable replacement to the current commercial uses. In this regard the loss of the current employment, retail and leisure uses are acceptable from a planning policy perspective.

8.30. In this regard the Officers confirmed in the determination of the last application:

**“Officers therefore consider the loss of the existing uses acceptable. Officers consider that any policy conflict arising from the proposal would not be significant. In relation to Policy EE2, there is an identified need for new homes and there are no strong economic reasons as to why such a development would be inappropriate. With regard to Policy TCS3, the lawn mower shop cannot be described as a shop that meets local needs, such as a convenience store. The modest nature of the personal training studio and the fact it failed within two years means that its loss would not be harmful to the supply of indoor leisure and recreational opportunities.**

**The loss of the existing uses is considered acceptable and broadly in accordance with Policies EE2, TCS3 and LRC1.”**

Summary in relation to the principle of the development

8.31. This focus on sites within the urban area and on previously developed land is consistent with the NPPF, which establishes at paragraph 119 that **substantial weight** in the planning balance should be afforded to using brownfield sites within an existing settlement to deliver identified development needs.



- 8.32. In addition, given that Waverley is affected by Green Belt and one of the five purposes of Green Belt<sup>10</sup> is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land, significant weight should be given to the principle of re-developing this urban located PDL site for a care home. This is reinforced by the identified need from both a care home perspective as well as a need to regenerate and enhance this site from a character and land use perspective.
- 8.33. The NPPF is clear that planning policies and decisions should boost significantly the supply of housing, meeting the needs of all different groups in the community, not just those in need of affordable housing. The NPPG, updated in July 2019, uses strong language based on forecast population projections that the need to provide housing for older people is **critical**. Similarly, the NPPF in paragraph 81 confirms that significant weight should be placed on the need to support economic growth.
- 8.34. As already noted, the NPPG<sup>11</sup> is explicit in stating that the provision of housing for older people will count against a Local Planning Authority's housing requirement. Moreover, it is clear that there is an established existing and future need for specialist accommodation for older people, reinforced by the data provided by the proposed care home operator, Hamberley Care.<sup>12</sup> In addition, given that future land opportunities are limited by virtue of the existence of Green Belt land and that Waverley Borough is affected by the Surrey Hills AONB, and European nature conservation designations, significant weight in the planning balance should therefore be afforded to the benefits arising from the delivery of net new residential accommodation to meet the needs of older people on this site, given local need.
- 8.35. Moreover, as already set out in Section 7 of this Planning Statement, the assessment of the contribution to the delivery of housing that the proposed C2 use would make, when compared to a C3 use, is benchmarked against the Government's up-to-date Housing Delivery Test methodology. The conversion ratio of 1.8 set out there in results in the equivalent of 41 units of C3 accommodation, net 39 when accounting for the loss of the existing dwelling units on the site.

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<sup>10</sup> NPPF paragraph 134e.

<sup>11</sup> Paragraph 001 Reference ID: 63-001-20190626

<sup>12</sup> Care Home Operator Statement (Annex 1)

- 8.36. The proposal therefore makes efficient, and policy compliant, use of previously-developed land to meet evidenced (and unmet) local housing need. As set out in Section 7 of this Planning Statement, in Hindhead, the need for accommodation for older people is established, and the allocation of the site for a care home is part of the strategy to meet such needs. NPPG is clear that C2 uses contribute equally to meeting housing need.
- 8.37. The proposal would deliver the efficient re-use of previously developed land (compliant with paragraphs 124 and 125 of the NPPF) within a defined urban area (compliant with development plan Policies H4 and S1 and paragraph 119 of the NPPF) for an established local housing need for a specific group (the elderly) (compliant with paragraph 62 of the NPPF), helping to boost the supply of homes (compliant with paragraph 60 of the NPPF), and support economic growth (compliant with paragraph 81 of the NPPF). The proposal therefore responds positively to the policy framework set out in the NPPF.
- 8.38. The analysis set out above has also demonstrated that the loss of the existing retail, office and leisure uses are acceptable when assessed against the Council's planning policy framework, as supported by the marketing report submitted as part of this planning application.
- 8.39. In summary, the principle of the proposal is therefore acceptable, and compliant with development plan policy. Having established that the principle of the re-use of the site for a C2 residential care home is policy compliant, there are a number of material planning benefits that would arise from the efficient redevelopment of this brownfield site within an urban area, which also weigh heavily in favour of the proposal. These are relevant to the balancing exercise to be undertaken in determining the acceptability of the care home proposal in terms of delivering 'sustainable development'.

*Material considerations (benefits) arising from the provision of a C2 care home*

- 8.40. The Material considerations (benefits) arising from the provision of a care home are discussed below under the following headings:
- 1. Optimum re-use of previously developed land
  - 2. Townscape benefits

- 3. Meeting an identified need for accommodation for older people
- 4. Meeting general housing needs
- 5. Health and well-being benefits
- 6. Economic development and employment

#### **1. Optimum re-use of previously developed land**

8.41. The scheme would make optimum re-use of previously developed land in the urban area, in an Authority that is limited in respect of development opportunities given that Waverley Borough is constrained by Green Belt, the Surrey Hills Area of Outstanding Natural Beauty and nature conservation designations. Development plan policy (SP1) and the NPPF give “substantial weight” to using suitable brownfield land within settlements for homes and other needs in planning decisions (paragraph 120). Substantial weight should therefore be afforded to the re-use of the site for the proposed development, given that the site is brownfield, making optimal use of the land to meet identified housing needs for older people.

## 2. Townscape benefits



Existing Portsmouth Road Street Scene



Proposed Portsmouth Road Street Scene



**View of application site from Royal Huts Avenue. A tired site and frontage in urgent need of regeneration and enhancement**



**View of application site from Royal Huts Avenue with proposed care home in place**

8.42. The application site has become increasingly run down and dilapidated since the opening of the A3 Hindhead bypass. As evident from above, it detracts from the immediate area, in particular Royal Huts Avenue street scene. The uses are no longer sustainable from an economic perspective, hence the run down looking nature of the site. Given the relatively affluent nature of the area, the site has a tired dilapidated look that is more evident and starker by comparison to its surroundings. A new use for the site is required that will regenerate and enhance the site and its immediate surroundings. In this sense the proposed care home is not only a logical use compatible with the location of the site within the 400m SPA buffer zone, but one that

meets a need but also allows the site to be regenerated and improved in townscape appearance terms. This is a significant and long overdue benefit for the site and the more immediate, as well as wider, surrounding areas.

- 8.43. Accordingly, the loss of unattractive buildings that detract from the surrounding area and their replacement with a bespoke, character-led, well designed building with landscaped areas will enhance the character and appearance of the site and its contribution to the surrounding area.

### **3. Meeting an identified need for accommodation for older people**

- 8.44. In the light of the national policy context, particularly the fact that, as identified in NPPG, the need to plan for older people is “critical”, and in the context of the findings of the research documents that have looked in particular at the housing needs of older people, shaped even more clearly into focus by the June 2020 issue of the 2018-based household projections, it is clear that the supply of housing in England needs to adapt rapidly to increase significantly the supply of a range of specialist accommodation to the meet the needs of older people.
- 8.45. Immediate action needs to be taken to help avert a national crisis in meeting this accommodation need – otherwise the long-term health and well-being and fiscal consequences for the country will be far-reaching, and there will be an unfortunate reflection on politician’s parts that the depth of this crisis could have been averted by pre-empting rather than reacting too late to the situation. The challenges that the country has faced in respect of the Covid-19 pandemic should serve as a lesson that the health and well-being of all sectors of the population demographic is important, and that the needs of older ‘last time buyers’ are just as important as those of ‘first time buyers’.
- 8.46. In the light of the recognition at the national level that “the need to provide housing for older people is critical” (published in an update to NPPG on 26th June 2019), further corroborated by the evidence and research published at a national level regarding the need for accommodation to meet the needs of older people (as set out above), and the statistics arising from the 2018-based household projections, significant weight should be afforded to the provision of accommodation for older people as part of the overall planning balance. In particular, the provision of a C2 care home would help meet the

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acute need for additional care home bed spaces, including dementia beds, in a modern, purpose-built setting. Sadly, as is clear from the Operators statement (Annex 1) this is particularly pertinent in the light of the Covid-19 health crisis, where the format of purpose-built care homes, with shared facilities for each floor, accompanied by individual en-suite shower rooms, provide a far more efficient and safe way for carers to manage infection control. There is a significant shortfall of such bedspaces with only 41.5% of bedrooms in the current care home stock having such essential facilities.<sup>13</sup>

- 8.47. There is no specific policy framework or specific allocations for care homes per se within the Council's development plan. This reinforces the case/need for this particular proposal. Whilst sites allocated for C3 residential development could be developed to include specialist forms of housing such as care homes, this is not specifically required. The larger residential sites are acquired and developed by national and regional housebuilders with no flexibility in their business models or products to include a C2 care home. This effectively leaves the market to determine whether the provision of a care home on an allocated residential site would be viable and economically deliverable when compared to C3 residential units. As evidenced by the 'Too Little, Too Late' report, the policy framework fails to enable the delivery of specialist accommodation to meet older people's housing needs, resulting a significant mismatch between demand and supply, which, based on the needs evidence set out above which shows a national shortfall in the provision of accommodation for older people when set against population demographics, will only continue to widen.
- 8.48. As noted in section 7 of this Statement, with regard to the need for C2 care home accommodation, it is clear that this need is current and will continue to grow exponentially. However, as also noted in section 7, there is no documentary regarding recent additions to the specialist older people's accommodation stock. Moreover, the allocation of the site in the draft submission Local Plan 2 indicates that the provision of the care home on this site is acceptable and would be welcomed and supported.
- 8.49. In this context, the provision of specialist accommodation for older people would contribute to helping to meet a recognised and evidenced need in the Local Authority's administrative area, and, in particular, for those living with dementia. The principle of the acceptability of specialist accommodation for older people should be accepted as

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<sup>13</sup> Operators Statement paragraph 3.1 (Annex 1)

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in accordance with national and development plan policy. In the light of clear national and local need for accommodation to meet older people's housing needs, significant weight should be given to meeting an identified and growing need for accommodation for older people that remains unmet.

8.50. Thus, the proposed care home use has a number of additional, significant, material planning benefits. It would help meet the acute need for additional care home bedspaces, including dementia beds, to replace poorer quality care homes that have closed in the local area, re-providing these in a high quality, modern and purpose-built setting, well located to meet these important needs. Sadly, this is particularly pertinent in the light of the current Covid-19 health crisis, where the format of purpose-built care homes, with shared facilities identified in cores on each floor, accompanied by individual en-suite shower rooms, provide a far more efficient and safe way for carers to manage infection control.

8.51. This meets the intentions of paragraph 8 (b) of the NPPF, which sets out that the social objective associated with the delivery of sustainable development is:

**“...to support strong, vibrant and healthy communities, but ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.”**

#### **4. Meeting general housing needs**

8.52. Recognising that the proposal will meet an established need for C2 care home accommodation, the scheme will also be catalytic in terms of freeing up existing C3 housing stock. The properties occupied by older people have the potential to meet the housing needs of other groups in the demographic profile in Waverley Borough. This was acknowledged by an Inspector in an appeal decision into an extra care home proposal in the same Local Authority administrative area, in West Malling, Kent, reference APP/H2265/W/18/3202040. He stated at paragraph 42 that:

**“As the Government has recognised in paragraphs 4.42 to 4.44 of the White Paper ‘Fixing our broken housing market’, helping older people to move at the right time and in the right way can help their quality of life as well as freeing up more homes for other buyers. Under-occupied homes could then be released onto the market where they would be particularly attractive to those in younger age groups in**



**need of larger houses to raise families. The provision of specialist housing more suited to the needs of older persons is likely to encourage them to move and would make a valuable contribution to overall housing needs which should be weighed in the balance.”**

- 8.53. This view has been further corroborated in an appeal decision for a care home in Arun District, published on 21<sup>st</sup> January 2020<sup>14</sup>:

**“46. The appeal scheme would free up general needs housing, which the Council accepts would count in some way towards housing provision in a circumstance where it is unable to demonstrate a 5 year supply of deliverable housing land.”**

- 8.54. This principle was reiterated in connection with an appeal for the provision of 21 retirement flats at Udney Park Road, Teddington (reference APP/L5810/W/20/3256402), where the Inspector’s decision notice states at paragraph 33:

**“However, the appeal proposal would have scope to provide for the needs of older residents, which in turn would enable downsizing and freeing up of some of the existing family-sized housing stock.”**

- 8.55. With specific regard to this proposal, therefore, a number of local residential dwellings will be freed up by building the new care home. Using the conversion figure of 1.8 set out in the Government’s Housing Delivery Test Rule Book, the provision of the care home would be equivalent to creating availability of 41 ‘newly available’ homes. Offsetting this against the loss of the two existing dwelling units on the site, this would represent an equivalent increase of 39 new homes, thus, contributing to five-year housing land supply based on a simple numeric calculation through the delivery of care home bedspaces. However, there is in addition a multiplier effect, given the strong likelihood that additional C3 housing capacity will be generated through the release of existing accommodation to meet other housing needs in the Local Authority’s demographic.

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<sup>14</sup> APP/C3810/W/19/3227374: Land to the rear of Bairds Farm Shop, Crookthorn Lane, Littlehampton BN17 5SN

- 8.56. In this context, the proposal will utilise previously developed land to help to boost significantly the supply of housing to meet identified needs, in an area where development opportunities are heavily constrained by the existence of restrictive Green Belt, landscape and nature conservation designation planning policies.
- 8.57. Therefore, these benefits are multiplied by the potential that the care home element of the scheme has to free up capacity in the existing housing stock, thus these benefits arising from the scheme as a whole should therefore be afforded sizeable and significant material weight in the planning balance.
- 8.58. Concluding on this point, meeting general housing needs is a benefit, consistent with the Government's objective of boosting significantly the supply of housing and meeting these specialist care home needs is also of significant benefit. Moreover, given the planning policy constraints that apply in Waverley Borough, every opportunity to maximise the delivery of new homes in the Authority's administrative area should be supported.

## **5. Health and well-being benefits**

- 8.59. The provision of high quality C2 bedspaces will make a material contribution towards meeting significant and important needs, particularly in respect of the health and well-being and other specialist accommodation for older people will make a material contribution towards meeting significant and important needs, particularly in respect of the health and well-being of local residents through a specialist care offer: a care package; monitoring of residents' well-being; facilities to encourage activity and mobility; and reduced isolation and associated mental health issues (something that has come sharply into focus in the light of the Covid-19 pandemic). The on-site support will reduce the need for residents to make use of primary health care services or social services in the area, as well as relieving pressure on hospital bedspaces.
- 8.60. This is corroborated by research carried out by Aston University. From 2012 to 2015 the Extra Care Charitable Trust commissioned Aston University to undertake a study looking at the benefits for older people of living in a retirement village, with some of the findings also transferable for the purpose of understanding the health and well-being benefits of residing in a C2 care home. The study highlighted for the first time the

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benefits of allowing older people to live in a retirement community with on-site support services. Key findings of the research included:

- Residents experienced a significant reduction in the duration of unplanned hospital stays from 8 to 14 days to 1 to 2 days;
- Routine GP appointments for residents fell 46% after a year;
- NHS costs for residents were cut by 38% over 12 months compared with their costs when they first moved in.

8.61. Accordingly, there is evidence that bespoke development projects for older people, accounting for the nature of on-site care provided, will reduce pressures on existing local healthcare facilities such that in fact, no improvements will be required to existing healthcare. There is in fact often less need to call on local healthcare services, rather than more. In addition, residents are frequently already living in the local area, therefore registered with a GP practice in the locality, hence not resulting in a net additional demand on the GP system.

8.62. This latter point is corroborated by care home operators, who report that for the most part, over 70% of people who move into a care home do so from within a 3-mile radius of the home. At an average age of 90, where the choice exists, people prefer to stay within their local environment for ease of access to friends and family. This then means that the majority of the people living within the home will remain registered to their current local GP practice and therefore the home would not be adding any additional burden to the local surgeries. Therefore, given the predominantly local catchment for care homes, for the most part, it will not create net additional people within a new location per se. Nevertheless, for the remaining residents that do move from outside the catchment area of the local surgery, they will in turn be freeing up a space/allocation in their existing surgery, resulting in no net additional demand on the NHS in any event.

8.63. Operators' experience also suggests that a combination of solutions is in place to meet the residents' medical needs. Some care homes have regular visits from GPs who attend the home outside core surgery hours, and see residents 1-2-1 over a short, focused, period of time. This is seen by all as a huge benefit to local GPs, who can see more people in a short space of time, thus supporting the care home residents, but also being far more efficient in terms of demand on GPs' time. Other local GPs

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carry on as they would normally, and the care home operator arranges transport to/from the local surgeries. Thus, there are a variety of ways that the residents can see a GP without this becoming an additional burden on a local Clinical Commissioning Group.

- 8.64. This view is affirmed in the findings from an Inspector’s appeal decision in Tonbridge and Malling Borough in 2018, Appeal reference 3202040, which related to the provision of a care home. With regard to health and well-being benefits, paragraph 43 of the Inspector’s Report commented that:

**“I acknowledge the Appellant’s evidence, which the Council does not dispute, that the development would be likely to provide health and well-being benefits including: the care package; monitoring of the residents’ well-being; facilities to encourage activity and mobility; and reduced isolation. The on-site support would be likely to reduce the need for residents to make use of primary health care services or social services as well as relieving pressure on hospital bed-spaces...”** (My underlining)

- 8.65. In addition, it should be reiterated that, in the light of the current Covid-19 health crisis, the format of purpose-built care homes, with shared facilities focused around core areas on each floor, accompanied by individual en-suite shower rooms, provide a far more efficient and safe way for carers to manage infection control. This is a very important health and well-being benefit.

- 8.66. Further information from the proposed care home operator, Hamberley Care, regarding healthcare demands in respect of local GP surgeries is set out below.

- 8.67. Based on experience of operating its care homes, Hamberley has provided the following commentary on how the health care needs of its residents will be met:

*- Hamberley’s experience is that most of our residents will already be living in the local area, and thus are already registered with GP services locally. We admit the vast majority, indeed, sometimes all, of our residents from within a very local catchments area, so we do not add any pressure to patient lists, as generally, they are already on the same GP list. In summary, we have seen no evidence that our homes lead to an influx of residents from elsewhere. Indeed, we know*

*that people tend to choose care homes nearer to home to maintain the same social circles and stay connected*

*- Local authorities signpost people to care homes in the same area, and the same applies for Clinical Commissioning Groups*

*- Residents often come straight from hospital, helping to address 'delayed transfer of care' by providing a place for someone who might otherwise remain in hospital. In this respect, the care home would reduce the impact on The Royal Surrey County Hospital, rather than increase it, whilst also assisting with freeing up bedspaces for others in need of hospital care*

*- Registered nurses within our care homes are qualified to assist, manage, and care for day-to-day conditions, reducing rather than increasing the burden on the local surgery. Nursing care is provided on site 24/7, so dependency on practice-based community teams is reduced notably, as we are able to provide interventions in care one site without having to draw on GP or hospital services*

*- As a nursing home therefore, we have 24-hour nursing cover, which results in fewer GP call outs, reduced hospital admissions and quicker discharge from hospital as a place for people to go to convalesce before returning home*

*- Our training programme also means that we are providing opportunities to train, and indeed we are training, the next generation of nurses*

*- Hamberley Care Homes puts in place agreements with local GP surgeries, entering into a paid Service Level Agreement, to ensure proportionate funding is in place to provide health care through the GP practice where this extends beyond the nursing services provided by nursing staff at the care home*

*- The centralisation of patients on a single site would mean that the local practitioner could visit ten or more patients in a single morning, in one location, reducing travel time and therefore increasing capacity. Visiting each of these people individually would take significantly longer. Therefore, having a cohort of people in the same care home naturally reduces the burden on primary care because it reduces appointments, surgery time and the number of visits required to separate locations*

*In summary, as a nursing home, the care provided on site helps to relieve downward and upward pressure on the NHS, with fewer emergency admissions and quicker discharges.*

Analysis of average catchments for care homes

*Carterwood undertakes research to analyse markets in health and social care to assist with strategic development decisions. It published in 2013 a 'Focus' report which looked at how far those moving to care homes travelled from their homes. The research analysed 93 care homes, with 3,133 elderly residents, with coverage throughout the UK across nursing and personal care for the elderly. The research found the following:*

- 66.5% of residents travel 5 miles or less*
- 43% of residents are within 2 miles*
- There is a correlation between how urban and rural an area is and how far people will travel*
- The more 'urban' the area, the shorter the average distance of travel: indeed, 2.8 miles is the average move distance to a care home for residents living in urban areas*
- For distances of 4 miles or less, there is a broadly similar distribution between local authority and privately funded residents*
- The overall average distance travelled is almost the same for the two groups, suggesting that proximity of the care home is the dominant factor at work*

*On the basis of this national research, it is likely that at least two thirds of the care home residents will come from within a catchment of 5 miles, and indeed, just under half will already live within 2 miles of the site.*

*When considering the location of existing GP surgeries within the five-mile catchment of the proposed care home, the catchments for these surgeries will all overlap with the catchment for the care home. Whilst it is not possible to show this diagrammatically due to the difficulty of obtaining GP surgery catchment maps, were this to be shown visually, it would effectively be in the form of a 'Venn Diagram' that would show that the majority of care home residents would already be registered with GP practices locally. This factor, combined with the commentary set out above from Hamberley Care regarding how the healthcare needs of its residents are met, provides a strong degree of reassurance that the*

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*care home will not result in significant additional pressures on the local GP surgery network.*

- 8.68. Finally, in the light of research into the need for specialist accommodation to meet the needs of older people, and the evidence that this bespoke accommodation has significant fiscal and well-being benefits, including tackling feelings of isolation in older age, the physical and mental health and well-being benefits arising from the provision of this specialist accommodation is indisputable. In fact, without such provision, given the clear evidence regarding health and well-being benefits of providing specialist accommodation for older people as set out above, in the light of the 2018-based household projections (which suggest that there will be more than an additional 1 million households aged 75+ between 2018 and 2028) the consequences for the public adult social care and NHS budgets would be even more far reaching.
- 8.69. In summary, there are notable overall net benefits to health and well-being to the local community, as well as a national benefit in terms of meeting the nation's demonstrable housing needs for older people, that would arise from the delivery of specialist accommodation for older people, and these factors should be given significant material weight in the planning balance given the social objective set out in paragraph 8 of the NPPF in respect of the delivery of sustainable development.

## **6. Economic development and employment**

- 8.70. Further significant benefits that would arise from the provision of specialist accommodation for older people relate to the economic benefits associated with the implementation of such schemes, given that, whilst meeting a specific housing need, they are also commercial operations.
- 8.71. The NPPF requires the planning policy framework to be sufficiently flexible to allow developers to respond to the prevailing economic climate, without stifling change, innovation and other forms of economic development in a world where economic creativity and growth will continue to expand beyond the confines of a strict use class that defines economic growth to a narrow band of business operations in the form of offices, industrial and storage/warehousing type uses. Commercial, economic generating, operations exist in many other guises, such as the provision and operation of specialist accommodation for older people.

8.72. NPPF paragraph 8 is clear that achieving sustainable development includes an economic objective; and this is to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth. This is all the more pertinent with the current and future economic climate arising out of the Covid-19 pandemic. Enabling the provision of commercial, economic uses such as care home developments is equally valid in terms of delivering the economic strand of sustainable development. Moreover, for the economy to function, sufficient housing of the right mix is required in the right locations and at the right time. Specialist accommodation for older people, as proposed, will assist with this strand of functional economic benefits.

8.73. By way of example, typically, a 74-bed care home scheme would have a direct job creation impacts of around 72 full time equivalent jobs, with the potential to offer many of these as flexible part-time opportunities. There are different jobs with different skill levels associated with the 24-hour operation of a C2 care home facility. These include:

- General Site Manager
- Clinical Care Manager
- Customer Relationship Manager
- Business Administrator
- Receptionist
- Hotel Services Manager
- Nurses
- Carers
- Senior Carers
- Hostesses
- Housekeepers
- Chefs and Kitchen Assistants
- Activities Coordinators
- Gardener/grounds maintenance
- Cleaners

8.74. Paragraph 81 of the NPPF obligates Local Planning Authorities to place significant weight on the need to support economic growth and productivity. The delivery of a care home will result in net employment generating benefits through direct, indirect and induced job creation during the construction of the care home, and once the site is operational through on-site staffing and supply chain links. The site currently employs 7 full time equivalent (FTE) staff members. Clearly, given the staffing profile set out in



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the paragraph above, the delivery of the care home offers the opportunity for substantial net employment generation in Hindhead, of around 67 FTE jobs.

- 8.75. The provision of a substantive increase in job availability arising from the delivery of specialist accommodation for older people, whilst retaining and/or enhancing significantly a site as an employment generator, therefore represents a significant material consideration in favour of the proposed scheme, which should weigh strongly in its favour.
- 8.76. In addition, paragraph 124 of the NPPF, which requires planning policies and decisions to make efficient use of land, refers in criterion b to the need to take account of local market conditions. Specialist accommodation for older people represents a substantial multi-million-pound commercial investment into a Local Authority's administrative area, and the proposal represents the existence of a strong local market for the provision of this specialist accommodation. This is corroborated by the fact that an operator for the site, Hamberley Care, has already been identified. Not only will there be the direct short-term economic benefits arising from the construction phase for the development, but there will also be direct long-term economic benefits arising from the employment opportunities associated with the day-to-day operation of the care home, as set out above. This is different to a C3 residential scheme where the economic benefits are shorter term and temporary.
- 8.77. In addition, there will also be indirect economic benefits arising from employment and activity in the supply chain companies providing support services for the care home. An induced economic benefit will also arise through expenditure from employees spending their income on goods and services in the local economy. This delivers an alternative economic use, and therefore contributing to the resilience of a local economy.
- 8.78. These economic benefits are corroborated by an appeal decision on land in Arun District<sup>15</sup>:

**“46...Economically, the scheme would support the construction industry during the build phase and a significant number of jobs would be created when the centre**

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<sup>15</sup> APP/C3810/W/19/3227374: Land to the rear of Bairds Farm Shop, Crookthorn Lane, Littlehampton BN17 5SN

**is operational. Spending by users of the care centre would support local businesses such as the nearby public house. All of these benefits must be factored into the planning balance.”**

- 8.79. In addition, in the light of the HBF Homes for Later Living: Healthier and Happier Report, other indirect economic benefits will include annual savings to the NHS and Adult Social Care budgets.
- 8.80. In this context, the provision of specialist accommodation for older people is strongly aligned with the economic objectives set out in the NPPF, and accordingly, significant weight should be afforded to the economic benefits that would arise from the provision of specialist accommodation for older people.
- 8.81. It is clear from the evidence presented in this Planning Statement that the principle of this proposal is policy compliant, and that its significant benefits contribute to delivering the objectives of sustainable development as set out in paragraph 8 of the NPPF. It thereby responds to the requirement in paragraph 10 of the NPPF that development is pursued in a positive way, reflecting the presumption in favour of sustainable development at the heart of the Framework.
- 8.82. In the context of these tests as set out in the NPPF, in terms of the public benefits that would arise from the care home scheme, as set out in Section 7 of this Planning Statement, there is an identified need for care home bed spaces in Waverley Borough. The benefits of meeting this need, in social, environmental and economic terms particularly, are set out above in this section of this Statement. To reiterate, these benefits relate to:
- The loss of unattractive buildings that detract from the site and the surrounding residential area and their replacement with a bespoke, character-led, well designed building with landscaped areas will enhance the character and appearance of the site and its contribution to the surrounding area, delivering townscape improvements;
  - Responding to an identified and established need for specialist housing that is not otherwise being met, which counts equally to meeting Waverley’s overall housing need;

- Making optimum use of previously developed land, delivering in equivalent terms significantly higher housing numbers from a site identified in the development plan as having development potential, in an area that is heavily constrained, including by Green Belt land, AONB and nature conservation designations;
- Having a catalytic effect in terms of freeing up existing housing stock;
- Health and well-being benefits, including reduced isolation and associated mental health issues, and reduced pressure on local health care facilities and services;
- Maintaining and enhancing the economic/employment function of the site;
- Adding to the vitality of Hindhead;
- Direct, indirect and induced economic benefits during construction and on-going operation of the care home;
- Improved and increased variety of new jobs generated by a care home.

8.83. In conclusion in relation to the principle of the development, this Section of this Planning Statement has demonstrated that there are number of material considerations (benefits) that reinforce the merits of the proposal. These material considerations can weigh in the planning balance in the event of any adverse effects arising from the scheme.

8.84. However, it is clear from the information presented in this Planning Statement, supported by relevant technical documents, that the benefits of the scheme are significant, even overwhelming, and therefore support the principle of the provision of a care home scheme on this site. In this context, the remainder of this Section therefore considers detailed development management considerations relating to the

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proposal, supported by the various technical reports that accompany this planning application.

Development management considerations

8.85. Having established that the principle of a care home scheme on the site is acceptable in terms of meeting housing needs, and that there are significant and material benefits that would arise from its delivery in economic, social and environmental terms, this Planning Statement goes on to assess the detailed development management considerations associated with the proposed scheme. The matters will be dealt with under the following headings:

- 1. Design matters: layout, scale, impact on residential amenity
- 2. Trees, landscaping, biodiversity and amenity space
- 3. Transport and car parking
- 4. Contamination and drainage

**1. Design matters: layout, scale, materials, impact on amenity**

*Design*

8.86. The Design and Access Statement (DAS) that accompanies this application sets out in detail the principles relating to the design of the care home. It details the iterative process in terms of the design of the scheme, which has taken place through the pre-application process and pre-application public engagement. The DAS documents this evolution in section 3, showing how the design and siting of the care home building has evolved to the current planning proposal, taking account of feedback received since the refusal of the last application whilst maintaining the established acceptable relationships to adjoining properties.

8.87. The proposed care home will provide 74 bedrooms arranged over two and a half stories, laid out in flexible wings with a broad range of communal facilities and will be fully compliant with the regulatory requirements of the Care Quality Commission (CQC). It has been designed in partnership with Hamberley Care, the proposed operator, and therefore reflects the measures required to secure the successful and safe operation of C2 care facilities.

8.88. In terms of the siting of the care home, the positioning and orientation of the building has been determined by the shape of the site and the relationship to neighbouring properties, other contextual matters including the protected trees to the Portsmouth Road frontage. This is set out in more detail in the Site Analysis contained in the DAS, an image of which is reproduced below:



**Extract from Site Analysis Plan**

8.89. An extract from the Proposed Site Plan, which has been designed carefully to respond positively to the combination of contextual parameters, is reproduced below. The location of the building allows for a private communal amenity area to the north west of the site. The site is set back from the Portsmouth Road frontage, a large proportion of which is set behind successfully retained TPO trees.



**Extract from the Proposed Site Plan**

8.90. In terms of context, the design can be compared to the existing buildings on the site that are generally run down and show no positive or contextual design features. The contextual images below represent powerful visual comparisons that clearly show the potential to improve the site, street scene and surrounding area, and that these improvements would result from the implementation of the proposal.



**Existing Application Site Context**

- 8.91. Portsmouth Road is a linear street with no architectural landmarks. Accordingly, the Andrews site should read within, and as part of, the existing street scene, which is very much linear in form with no architectural landmarks or standout statement buildings. The site is not therefore in the right location to accommodate a standout landmark building itself. This would ordinarily be located at a terminal point in the street or at a prominent junction. The Andrews site is not correctly positioned within this street scene to accommodate such a building.
- 8.92. There are a wide variety of buildings nearby, predominantly 2/3 storey in scale with no common use of materials. The adjacent Royal Huts Avenue development is characterised by large buildings with no attempt to break up their scale mass.
- 8.93. The Council's rejection of the previous more contemporary care home building on the application site under planning application reference WA/2021/01365 has led to amendments with a more traditional feel and appearance to the care home that successfully breaks the building down into rhythms of individual buildings that is notably different to, and more successful than, its larger neighbours. The revised design with its merits is illustrated below:

## Portsmouth Road Elevation

APPLICATION SCHEME | PORTSMOUTH ROAD ELEVATION



- Softer appearance using a more "earthy" colour palette.
- Building broken down into individual compartments by glazed links and variations to roofscape.
- Variation in materials adds interest, breaks up bulk and mass reflecting rhythm of existing area.
- A more sympathetic design to the area than larger Royal Huts Avenue buildings.
- More pleasing on the eye, more sensitive to the character of the area.
- A positive addition to the existing varied street scene.
- Height focussed on two central buildings falling away to the edges.

REFUSED SCHEME | PORTSMOUTH ROAD ELEVATION



## Rear Elevation

APPLICATION SCHEME | REAR ELEVATION



REFUSED SCHEME | REAR ELEVATION





**Design Change details**

**APPLICATION SCHEME | DESIGN DETAILS**



- Introduction of windows and projecting hipped gable on left-hand wing providing a more active and articulated elevation.



- Introduction of gable headed dormers and gable headed projections.  
 - Glazed links break building up into detached elements.



- Cream render, red bricks, matching soldier courses and red clay colour tiles.  
 - Wider projecting hipped gable providing a positive front elevation. Wider glazing to communal rooms.  
 - Canopy above providing a strong more vibrant and articulated elevation to entrance.

**REFUSED SCHEME | DESIGN DETAILS**



8.94. The visual below shows the proposed new care home in its new contextual street scene from Portsmouth Road.



**Proposed contextual street scene from Portsmouth Road**

8.95. The revised design, together with the proposed scale and sighting of the care home, confirm that it will not only enhance the character and appearance of the site itself, but also make a positive and complementary contribution to the character and appearance of the wider surrounding area and associated street scene. The proposal therefore accords with Policies TD1 of the Local Plan (Part 1) 2018, retained Policies D1 and D4 of the Local Plan 2002 and the Residential Extensions SPD.

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*Impact on amenity residential amenities*

- 8.96. The relationships with other properties surrounding the site by reason of the location of the building, its composition, height, and elevation treatment all remain the same as the previously determined application WA/2021/01365, that found the relationships with surrounding dwellings to be acceptable. The detailed analysis in the Officer's report, reproduced below, reaffirms this.

**“Impact on residential amenity**

**The proposed development would not result in harm to the residential amenity of neighbouring properties in accordance with Policy TD1 of the Local Plan Part 1 2018, retained Policies D1 and D4 of the Local Plan 2002 and the Residential Extensions SPD.**

**No. 1 Royal Huts Avenue**

**No. 1 Royal Huts Avenue is located to the rear of the site and its side flank wall runs parallel to the site boundary. There is a stretch of land (formerly and alternative access to the Andrews site) that sits between the main flank wall of this dwelling and the application site. The north eastern wing of the buildings site 8.2m from this boundary. In accordance with the Council's Residential Extensions SPD, the development would not infringe and angle of 45 degrees when measured either from the edge of the ground floor conservatory, or from the centre of the closest habitable window at first floor level. Therefore, no harmful loss of daylight would result to this dwelling.**

**With regard to outlook, the dwelling faces south west with views towards the rearmost section of the application site and the rearmost parts of the gardens of the Glenville Garden properties. As the building would not encroach across these views, it is not considered that any loss of outlook would result.**

**No habitable windows are positioned in the rear wall of the development closest to this dwelling (at the end of the north eastern wing of the building). There are habitable room windows on the main rear elevation of the building. These are located 18m from the boundary that the site shares with No.1 Royal Hut Avenue in accordance with the Council's Residential Extensions SPD which sets a guideline figure of 18m between proposed windows and neighbouring private amenity space.**

**There are communal terraces proposed at first and second floor level on the rear elevation of the main building leading out from a lounge on each floor. At their closest, these terraces would be 15m away from the boundary with no. 1. However, the distance between the terrace and the main amenity area (the part of the garden closest to the house) the terraces would be 25m from this dwelling. This is considered to be sufficient to ensure no harmful overlooking results.**

A refuse store is located approximately 2.5m from the boundary with this property. Whilst elevations of this refuse store have not been submitted it is anticipated that it would be single storey and therefore would not harm light or outlook to no. 1.

#### **Nos. 20 and 21 Glenville Gardens**

Nos.20, 21, 22 and 23 Glenville Gardens all back on to the site. Nos. 20 and 21 Glenville Gardens sit at an angle to the site which means they would also sit at an angle to the proposed building rather than facing directly towards it. Due to the angles of the buildings to each other the distance between them varies. At its closest, the building would be 18m from the rear boundary of no. 21 Glenville Gardens and 34m to the nearest rear windows in this property. At its farthest, it would be 21m from the shared boundary and 38m from the nearest rear windows. The building would be approximately 8.7m in height to the eaves and 13m to the ridge. The relative distance to height of the building from no. 21 Glenville Gardens means that it would not infringe an angle of 25 degrees from the rear windows of this property, in accordance with the Residential Extensions SPD. As the development is three storeys in height, there should also be a rear elevation to rear elevation distance of at least 26m. This standard is satisfied.

Impact on sunlight is also a relevant consideration. From midday, when the sun is due south of the site and at its highest, the extent of shadows cast by the care home building will be minimal and not in the direction of the Glenville Gardens that lie to the north west. As the sun moves to the west in the afternoon and evening the shadows from the care home will be cast more towards the east and therefore away from these rear residential gardens that lie to the west. There may be some impact on sunlight to these properties in the morning when the sun rises from the east but given the distance of the building from these properties, and the fact that they will still enjoy afternoon sun, this is not considered significant.

As no. 20 Glenville Gardens is located further away from the proposed building than no. 21 Glenville Gardens, daylight and sunlight impacts to this property are found to be acceptable.

With regard to outlook issues, officers acknowledge that the outlook from the rear of these properties will change quite significantly given that the scale of development is greater than currently. However, given the distances involved relative to the height of the development, it is not considered that a harmful loss of outlook or sense of overbearing would result.

The proposed roof terraces at first and second floor level would be located over 35m from the main rear windows of these properties and this distance is sufficient to ensure no harmful overlooking would occur.

#### **No.22 Glenville Gardens**

The building would sit on slightly higher ground than no. 22 Glenville Gardens. The closest part of the building to this property is the south

western return, the rear flank wall of which sits 14m from the boundary of this property and 25m from the ground floor rear windows.

With regard to daylight, the proposal would not infringe an angle of 25 degrees when measured from the nearest ground floor rear window 1m above ground level, and there would meet the Residential Extension SPD guidelines in this respect.

With regard to outlook, Officers note that the outlook from this property would change as a result of this development as the aspect from no.22 Glenville Garden is currently open. The proposal would see built from run across much of the extent of this property's rear boundary. However, as the main flank wall would be 14m from the shared boundary and 25m from the ground floor rear windows, this is considered sufficient to ensure that the development would not appear overbearing or harmfully increase the sense of enclosure from the property.

There may be some overshadowing of this property from the proposal as the sun rises in the east (more likely in the in the winter months), but it is not likely to cause significant harm.

The main south western return steps down to single storey towards the rear boundary of the site, specifically designed like this to ensure no harmful daylight or overlooking impacts to no.22. It is considered that the relationship of this single storey element to no. 33 is acceptable with regard to light and outlook.

There are no habitable windows in the flank wall of the south western return and therefore no harmful overlooking would result. The proposed roof terraces would be located over 35m from the rear windows of this property and therefore no harmful overlooking would occur.

#### **No.23 Glenville Gardens**

No part of the proposed building runs across the rear boundary of this property. Therefore, the direct rearward outlook from this property would not change, albeit it would be possible to achieve angle views of the building from it. The relationship of the building to this dwelling is acceptable. Furthermore, the development would not infringe an angle of 45 degrees within 12m of the rear windows of this dwelling and is therefore acceptable with regard to daylight.

There may be some overshadowing of this property from the proposal as the sun rises in the east (more likely in the winter months) but it is not likely to cause significant harm.

There would be no habitable room windows facing towards this property and the angle and distances of the terraces to this property mean that no harmful overlooking would result.

#### **Tower Road properties**

There are three dwellings that back on to the site in Tower Road. These properties would face towards the two and a half storey south western return of the building. The new building would sit on slightly higher ground than these dwellings. Due to the angle of these properties to the

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**proposed building the distance from the rear boundaries of these dwellings to the building ranges from between 14 and 20m. The shortest distance to rear windows in these dwellings is 27m. These distances are sufficient to ensure that no loss of light, outlook or privacy would result.**

### **Royal Huts Avenue and Portsmouth Road Properties**

**The distance between Royal Huts Avenue dwellings and flats and the proposed building is such that no loss of light, outlook or privacy would occur. The same is true for the properties along Portsmouth Road.**

**Whilst the outlook from properties backing onto the site would change noticeably, for the reasons outlined above, there would not be a harmful impact on neighbouring residential amenity by way of loss of light, outlook or privacy, in accordance with Policy TD1 of the Local Plan Part 1 2018, retained Policies D1 and D4 of the Local Plan 2002 and the Residential Extensions SPD.”**

- 8.97. The proposed care home will not cause material harm to the amenities of the occupiers of these neighbouring properties by way of overlooking, loss of light, overshadowing or an overbearing impact and is therefore compliant with relevant development plan policies and SPD.

#### *Scale*

- 8.98. The scale of the proposal is considered to be acceptable given the relationship with neighbouring properties. The siting of the proposed building back from the site frontage allows for a cohesive and improved street frontage to be created with new opportunities for soft landscaping. The setting back of the building will ensure that the building does not dominate the street scene or result in an overbearing impact, whilst meeting the Council’s requisite separation distances. The proposed care home will not therefore have any adverse impact on the amenities of neighbouring land uses. The street scene plan, as reproduced below, also confirms the scale of the proposed care home is acceptable having regard to the character and appearance of the more of wider area.



**Proposed Streetscene plan**

## 2. Trees, Landscaping, Biodiversity and Amenity Space

### *Trees*

The proposal is supported by a comprehensive Arboricultural Report. This has been prepared to address the matters raised by the Council's tree officer at the first pre-application meeting. The application scheme ensures, similar to the previous proposal, the location of the building outside the calculated Root Protection Areas of the TPO trees. It was acknowledged in the determination of the previous application WA/2021/01365 that a small part of the outer RPA of three trees along the Portsmouth Road frontage would be compromised by a short portion of path running along the edge of the building. The submitted Arboricultural Report confirms that this small area will be subject to hand dug excavation. Officers concluded on the issue of trees that:

**“The Council’s Tree Officer has reviewed the details provided and raises no objection with regard to the impact on trees, subject to conditions in relation to tree protection measures and landscaping.”**

- 8.99. The care home is sited to ensure that the canopies of trees along the Portsmouth Road frontage, and the south western boundary of the site, are at a sufficient distance to avoid pressure to remove these. The acceptability of the siting of the care home in this respect has also been accepted in the determination of the previous application WA/2021/01365.
- 8.100. However, to reaffirm this point, the application is accompanied by a daylight report. Having regard to the relationship of the care home to the retained trees, the technical analysis confirms that upon completion of the proposed development, the trees will not impact upon the ability of the care home rooms to achieve the minimum internal levels of illumination stipulated in the BRE Guide (BRE Guide 209 - “Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice, 2nd Edition”). Accordingly, having regard to this objective assessment, it is established that the proposed accommodation is acceptable from a daylight perspective. Given the retained trees are protected and considering this objective assessment, there should not be any justified circumstances for the removal of these trees based on inadequate levels of daylight. Accordingly, the scheme has been appropriately designed to ensure the trees are successfully retained and will not be subject to pressures following occupation for removal.

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- 8.101. The Arboricultural Report recommends some sensitive tree management including ivy clearance to some of the trees along the south western boundary. This will help to restore a managed canopy edge to the site. Significantly, the function and integrity of the group of trees along this boundary will be retained and the trees, both individually and collectively, will continue to serve their primary function of maintaining a soft edge to this part of the site and setting to the three dwellings that lie beyond.
- 8.102. The above analysis confirms that the proposals have responded positively to the earlier comments of the tree officer.
- 8.103. In addition to the sensitive location of the care home to the existing landscaped structure of the site, the proposal introduces a number of new trees within the site and along the Portsmouth Road and Royal Huts Avenue frontages which can only enhance the treed characteristics of the site by comparison to the existing, baseline, position. This matter is examined further below when assessing the positive impacts of the landscaping proposals.
- 8.104. Accordingly, the proposed redevelopment scheme is a sensitive development having regard to arboricultural and landscaping matters. Further detail on the soft landscaping proposals are set out below.

#### *Landscaping*

- 8.105. The application is supported by an Illustrative Landscape Plan. This shows a particular emphasis on softening the boundaries of the site where little landscaping is present. An extract from the Illustrative Landscape Plan is set out below.



Extract from the Illustrative Landscape Plan

8.106. New trees are to be planted around the site. As evident from the extract from the Landscape Strategy Plan above, particular attention has been made of the site frontage along the northern section of the Portsmouth Road frontage and Royal Huts Avenue. Here large scale native trees are to be planted to provide a new, enhanced landscape setting to the site. Beneath and between these trees will be a hedge that will add year-round structure to the site. Collectively, the landscaping scheme here will represent a significant improvement to the site frontage creating a green soft, attractive and semimature setting to the site. This is in stark contrast to the existing, which as evident from below is devoid of any landscaping.





Royal Huts Avenue: An absence of soft landscaping



Extract from the Illustrative Landscape Plan

8.107. The landscape plan includes a new comprehensive planting scheme along the rear of the site with neighbouring residential properties. This comprises a mixture of new Silver

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Birch, Rowan, Hazel and Holly all planted together as a tight group. Beneath and between the existing frontage Portsmouth Road trees a new hedge will be planted adding an all year-round structure to the site.

- 8.108. Individual planting schemes will also be provided around the two courtyards to the front and rear of the care home further enhancing the setting to the building whilst creating attractive landscaped communal spaces.
- 8.109. Overall, the proposed tree and landscaping scheme will complement the care home building, which collectively will result in a significant enhancement to the character and appearance of the site and its contribution to the immediate and wider area. In connection with planning application reference WA/2021/01365, to which the same soft landscaping principles applied, Officers concluded in respect of the landscaping scheme that:

**“The applicant has submitted a landscaping scheme which demonstrates how the site would be landscaped to provide an enhance setting for the building. The landscaping envisaged is considered appropriate.**

**The proposed development is therefore considered to accord with Policy NE2 of the Local Plan Part 1 and Retained Policies D6 and D7 of the Local Plan 2002.”**

#### *Biodiversity*

- 8.110. The site itself is not subject to any statutory or non-statutory ecological designations.
- 8.111. The site is currently dominated by buildings and hardstanding, with few areas of amenity planting present.
- 8.112. In terms of the operation of the care home, in order to ensure that the external lighting scheme does not raise any issues in terms of ecological matters, and to address the points raised in the Ecological Appraisal in respect of external lighting, the following condition is suggested as part of this application:

**“No external lighting should be installed until the detailed scheme of lighting has been submitted to, and approved in writing by, the local planning authority prior to the commencement of the development. This scheme shall take**

**note of and refer to the Institute of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Lighting GN01, dated 2005 (and any subsequent revisions) and shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) and an ISO lux plan showing light spill. The scheme of lighting shall be installed, maintained and operated in accordance with the approved scheme and less that local planning authority gives its written consent to any variation.”**

8.113. The proposals also present the opportunity to secure a number of net biodiversity benefits. The planning application is accompanied by a Net Biodiversity Gain Technical Note which demonstrates that the implementation of the proposal, through the above measures, and soft landscaping strategy, will deliver a net biodiversity gain. This is a material net gain for local biodiversity on and around the site and should be afforded moderate weight in the planning balance as a material consideration. In connection with planning application WA/2021/01365, and equally applicable to the current scheme, Officers concluded in respect of ecology:

**“Surrey Wildlife Trust has reviewed the proposals and advised that it does not raise any objection to the proposal, subject to conditions including that the development is implemented in accordance with the Landscape Management Plan that has been submitted.**

**The proposed development is therefore considered acceptable in relation to biodiversity and is in accordance with Policy NE1 of the Local Plan Part 1 2018.”**

#### *Amenity space*

8.114. With regard to external amenity space for the care home residents, given the low level of physical mobility of those residents, this can be met by areas of soft landscaping and greenery located around the periphery of the building. There is a larger area of outdoor space on land to the north-western side of the care home building, in the courtyard, which will incorporate shrub planting and timber seating. There will also be a naturally surfaced path suitable for wheelchair use. The operator-led scheme design, based on previous experience of implementing such schemes, means this is more than sufficient space to meet the needs of the residents, as it offers pockets of amenity space around the building where residents can stop and pause whilst using the outdoor space. This is of course in addition to the sensitively located terraces and balconies on the building, and individual patio areas to the majority of the ground floor bedspaces.

8.115. The Government's National Design Guide, published in September 2019, and which is a material planning consideration, sets out at paragraph 64, under the heading "Compact form of development", that:

**"Well-designed new development makes efficient use of existing land with an amount and mix of development and open space that optimises density. It also relates well to and enhances the existing character and context."**

8.116. In this context, the external amenity space proposed as part of this application is deemed to be compliant with national planning policy. It balances the competing land use elements of the scheme, whilst delivering a balance between meeting residents' internal space and external amenity space requirements, optimising the use of the site. It is therefore considered to be suitable to meet the needs of potential residents, and therefore acceptable within policy terms.

### **3. Transport and car parking**

8.117. The planning application is accompanied by a Transport Statement, setting out in detail the relevant transport planning considerations in connection with the development of the site.

8.118. The Transport Statement demonstrates that the site is well located in terms of walk distance to local facilities and services for staff. The 2km walk distance includes Hindhead Village and most of Grayshott and Beacon Hill. Portsmouth Road and other local roads in the vicinity of the application site are generally provided with footways on both sides and have street lighting. The majority of these roads are lightly trafficked although Portsmouth Road and Tilford Road continue to carry relatively high traffic flows in line with their continuing role as District distributor roads connecting to the A3 trunk Road.

8.119. The 5km staff cycling distance extends to include most of Hazelmere and Churt and a part of Headley Down. It should be noted that the 5km distance is a convenient cycling distance and is not a maximum and many cyclists would be prepared to cycle further than this, in particular for a journey to work.

- 8.120. Portsmouth Road is a bus route and there are bus stops in each direction within around 50m of the site. These bus stops are served by routes 19 and 23. Route 19 operates between Aldershot and Haslemere and provides an hourly service from shortly before 7am until about 6.30pm Monday to Friday. There is a similar service on Saturday although this starts an hour later. Route 23 operates an hourly service between Alton and Haslemere from about 7am until about 7.30pm Monday to Friday. The service frequency reduces to a 2-hourly on Saturday with reduced operating hours.
- 8.121. Suitable car parking provision is proposed appropriate to the development type and scale, including disabled parking provision, exceeding in totality the local standard, with the provision of 39 car parking spaces, including an ambulance and delivery bay. Cycle and motorcycle parking is also proposed in line with local standards, with five and two spaces, in a secure store, respectively. The Transport Statement accompanying this application sets out the parking provision in more detail and explains how this is comparative to other sites successfully operated by Hamberley Development Ltd. In addition, a Framework Travel Plan accompanies the application. The level and layout of parking was agreed with Surrey County Council (SCC) as part of the pre application process and was found to be acceptable by SCC in connection with the previous planning application reference WA/2021/01365.
- 8.122. A new single access road will be provided approximately mid-way along the site frontage with Portsmouth Road. This position will provide appropriate visibility splays along Portsmouth Road for drivers emerging from the access. This too has been agreed with Surrey County Council as part of the pre application process, and was accepted in respect of WA/2021/01365 as an appropriate access design.
- 8.123. In terms of the proposed care home, and the traffic generation arising, the Transport Statement demonstrates that the daily traffic flows are similar to the accepted vehicle flows arising from the existing land uses on the site. The peak hour flows are very low and there would be no material traffic impact on the local highway network.
- 8.124. Officers following consultation concluded in respect of WA/2021/01365:

**“The County Highway Authority has reviewed the proposals and the accompanying transport information. On the basis of the analysis and information provided, they are satisfied that the level car and cycle parking provision. It confirms that the County Highway Authority is satisfied that the proposal would not result**

**in a significant increase in traffic generation and that the proposal is unlikely to have a material impact on highway safety issues. The County Highway Authority therefore raises no objection, subject to conditions. On this basis, Officers are satisfied that the development accords with Policy ST1 of the Local Plan Part 1 2018.”**

8.125. This position is still applicable in connection with the current planning application. In summary, the proposed care home complies with the current relevant planning policy and would have no material transport impacts.

#### **4. Contamination and drainage**

##### *Contamination*

8.126. The planning application is accompanied by a Phase 1 Contamination Assessment Report which reviews the environmental setting and historic use of the site and surrounding land. This was achieved through a desk top review, accompanied by a site walkover, and groundwater and soil sampling from the site.

8.127. The report concludes that based on the investigation works undertaken potential sources of contamination at the site have been identified with moderate risks posed to current site users, future care home site users and construction workers although this risk could be reduced to low to moderate risk with mitigation. A moderate risk posed to the groundwater aquifer from the below ground fuel tank and current usage/ storage of chemicals associated with the lawn mower maintenance has been identified. However, the risk ratings will be verified and possibly reduced by implementation of several recommendations including a detailed site specific phase two site investigation. This will include targeted investigations around the below ground fuel tank and above ground waste oil container stroke tank to identify potential contamination. These investigations will identify the remediation works required, all of which can be secured by appropriate model conditions.

8.128. The application is also accompanied by a Phase 2 Report on Ground Investigation, and a Remediation Strategy and Verification Plan, which will avoid the need for additional conditions to be attached to a planning decision in respect of the preparation of these reports.

### *Drainage*

- 8.129. The application is accompanied by a Flood Risk and Drainage Assessment. In terms of flood risk and potential sources of flooding, a range of potential sources of flooding were reviewed, including tidal, fluvial, surface water, groundwater, sewers and water mains, and it was concluded that the risks were all very low to negligible.
- 8.130. The Flood Risk and Drainage Assessment also outlines a SuDS strategy which comprises a gravity network draining the building and impermeable external areas. This will discharge to the ground via soakaways and infiltration. The soakaways are proposed to be located in the car park and the landscaped areas. The report concludes that the development of the site will reduce flood risk within the site and to areas adjacent to the site by providing a drainage system that will control surface water discharge.
- 8.131. As the proposal shows that surface water will not be discharged to the public network, Thames Water raised no objection to the last application. The Lead Local Flood Authority has also reviewed the proposals and raised no objections, subject to conditions.
- 8.132. The Flood Risk and Drainage Assessment also deals with the aspect of foul water drainage. This confirms that the existing foul drainage system that serves the building is private and is maintained by the occupier. The outfall for the private foul drainage system is the Thames Water foul sewer that runs through the northern zone of the site. The report advises that Thames Water has confirmed that there is adequate capacity to cater for the foul discharge from the care home.
- 8.133. Thames Water raised no objection in relation to foul water sewerage network infrastructure capacity and on this basis, this element of the proposal is considered acceptable.
- 8.134. Overall, the development accords with the requirements of Policy CC4 of the Local Plan Part 1 2018.

### *Conditions*

- 8.135. A set of planning conditions were agreed as part of the previous application process. These were set out as part of the recommendation to grant planning permission in the Planning Officer's report to the Western Planning Committee dated 12th October 2021. Those same conditions should be adopted for the purposes of this revised planning application.

### *Conclusion*

- 8.136. In summary, this section of this Planning Statement has considered the main issues in relation to the proposed care home, demonstrating that the proposed use is acceptable. It has identified a number of benefits that would arise from its implementation. These are substantial in not only number but also nature and carry significant weight in the determination of the application.
- 8.137. Further analysis has been set out with regard to detailed development management considerations, illustrating that all matters have been addressed, and significant benefits delivered from the scheme. The amended design resolves the only outstanding matter from the previous care home application WA/2021/01365, in connection with the design of the proposed building.
- 8.138. The proposal is compliant with all relevant development plan policy and is therefore considered acceptable. This is summarised in the planning balance and conclusion section below.



## 9. PLANNING BALANCE AND CONCLUSION

- 9.1. The commentary below assesses the merits and potential impacts of the application scheme in relation to the three sustainability tests set out at paragraph 8 of the NPPF. Paragraph 8 of the NPPF states that (amongst other things) the assessment of the sustainability roles should not be undertaken in isolation, because they are mutually dependent. In accordance with the guidance at paragraph 8 of the NPPF, a combined analysis in relation to the sustainability role is set out below.

### Economic considerations

- 9.2. The principal economic benefits are summarised below:
- 1) Provision of net new residential accommodation, to meet identified unmet housing needs, in an area where there is a significant demand for new housing that in turn drives economic growth further and faster than any industry. In this regard the proposals will be contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is being made available in the right place and at the right time to support growth;
  - 2) The provision of specialist care accommodation where there is an established need, as set out in Section 7 and Annex 1 of this Statement. The proposal will deliver a care home on an allocated site in the emerging Waverley Local Plan Part 2 to meet specifically the housing needs of the older population in Waverley, both now and in the future, given the future demographics which show a significant increase in the 65+ population group. This reinforces the benefits of the proposal;
  - 3) With Hamberley Care as the operator, the application scheme is immediately ready to be implemented on its consent, such that the care home can deliver much needed specialist accommodation for older people in need of care during the early part of the five-year housing land supply period. It will also deliver on the environmental (townscape), social and economic benefits highlighted;

- 4) Meeting general housing needs is a benefit, consistent with the Government's objective of significantly boosting the supply of housing, and meeting these specialist care home needs is also of significant benefit, as set out in section 8 of this Statement;
- 5) For the economy to function, sufficient housing of the right mix is required in the right locations and at the right time. This site, falling within the urban area of Hindhead, is well located in terms of public transport links and local services, and lies in a sustainable location, ideal for the elderly in need of care;
- 6) The proposal would result in a net increase of around 74 equivalent full-time jobs, a net increase of 67 over the existing employment levels generated by the current uses on the site. A variety of employment opportunities of differing skill levels will be required to ensure the smooth and efficient running of the 24-hour care home facility. As a result, there will be a knock-on financial benefit in terms of the local economy, through servicing of the use and its employees thereby generating more employment opportunities and bring about a considerable improvement in terms of this wider economic benefit;
- 7) These new job opportunities are being created in a sustainable location close to where new homes are being provided;
- 8) Creation of direct jobs in each year of construction at a range of skill levels;
- 9) Supporting a further 'spin-off' jobs in services and other businesses during the construction phase;
- 10) The care home will provide new purpose-designed accommodation led by a care home operator for residents who require care where their existing residential accommodation is no longer appropriate. The provision of this specialist accommodation will free up current housing stock thereby assisting in meeting current housing needs in the area.

- 9.3. By providing land of the right type, in the right place, and at the right time to support economic growth, the development of a 74-bed care home on the application site satisfies the objectives at paragraph 8 of the NPPF and assists in the aims of the NPPF in helping to build a strong and competitive economy (NPPF, paras 81-85).
- 9.4. In accordance with the provisions at paragraph 81 of the NPPF, the economic benefits set out in this Statement should therefore be accorded **substantial weight** in the planning balance.

#### Social considerations

- 9.5. The principal benefits that would arise from the proposal in respect of the social role relate to helping to support strong, vibrant and healthy communities, including the provision of high-quality care home accommodation required to meet identified needs. In addition:
- 1) The benefit in providing additional housing stock to meet specialist accommodation needs for the elderly, in line with the Government's objective to boost significantly the supply of housing, is a substantial social benefit;
  - 2) The proposal would provide specialised accommodation to meet the needs of the older population in Waverley, responding directly to the type of accommodation needed in the locality, whilst delivering a purpose-built facility with a strong emphasis on enabling infection control measures to be practised to minimise the spread of disease in the event of health pandemics such as the Covid-19 outbreak;
  - 3) The scheme would enable the delivery of high-quality care home accommodation;
  - 4) The scheme provides care home bedspaces that are very accessible to local services and facilities in an area characterised by other community focused uses;

- 5) Health and well-being benefits for residents, including reduced isolation and associated mental health issues, and reduced pressure on local health care facilities and services.

9.6. Based on the foregoing, the social benefits of the scheme attract **substantial and significant weight** in the overall planning balance.

#### Environmental considerations

- 9.7. The proposed care home use is compatible with the location of the site within the 400m SPA buffer zone, as confirmed by Natural England's DAS response during the preapplication process. Accordingly, the proposed new use in this otherwise constrained area can deliver a significant number of environmental /townscape benefits unlike any other alternative land use.
- 9.8. The application scheme is not located on land designated at a national or local level for its townscape, ecological, or recreational value. It makes best use of previously developed land within an urban area, in a Borough with constrained opportunities for development, to help meet housing needs, thereby reducing the potential need to develop greenfield land to otherwise meet those housing needs.
- 9.9. The redevelopment and loss of unattractive buildings that make no positive contribution to the streetscene and surrounding area, and their replacement with a character-led, well designed, building and use that collectively will enhance the character and appearance of the site and surrounding area, will deliver significant townscape and therefore environmental benefits.
- 9.10. The loss of a non-conforming commercial use in a predominantly residential area will only enhance the character and appearance of the area. The proposed care home will represent a more benign use compatible with the surrounding residential environment.
- 9.11. All mature boundary trees are to be successfully retained. Sensitive management of the trees will also assist in preserving their condition and contribution to the site and surrounding area.
- 9.12. The redevelopment proposal will deliver net biodiversity gain.

- 9.13. The location and reuse of this site preserves other more sensitive sites elsewhere. The proposed development meets identified needs without detracting from the residential environment or the environment of neighbouring uses or the character and appearance of the surrounding area.
- 9.14. The environmental benefits of the scheme are clear and also attract **significant weight**.

### Conclusions

- 9.15. Planning applications should be determined in accordance with the development plan. . In this context, this Planning Statement has demonstrated that the principle of the proposed care home development is acceptable. It makes best use of previously developed land within an urban area whilst being compatible with the location of the site within the 400m SPA buffer zone. It is well connected to local services and facilities, to meet housing needs for older people. As demonstrated the details of the proposal are acceptable, but also delivers so many benefits. The proposal is development plan policy compliant and should be approved without delay.
- 9.16. This Planning Statement has considered the impacts that would arise from the delivery of the care home on this site and demonstrated with the support of specialist technical reports that any impacts that would arise from the scheme have been successfully addressed.
- 9.17. The revised design addresses the previous (single) reason for refusal resulting in a development compatible with the character and appearance of the surrounding area. Accordingly, the previous issue which precluded the grant of planning permission has now been successfully addressed such that the scheme is fully development plan policy compliant. Consistent with Section 38(6) planning permission should be granted.
- 9.18. Moreover, if any impacts are to be identified, they are outweighed by the very significant benefits (other material considerations) set out in Section 8 of this Statement that would arise from the care home proposal in the planning balance. The recent confirmation of a sizable housing land supply deficit (4.01 years (885 dwelling shortfall) and acceptance that the SPA does not give rise to a clear cut reason for refusal confirms that NPPF paragraph 11d is engaged. This means that if any adverse impacts are identified through the consideration of the application scheme, these would have

to significantly and demonstrably outweigh the benefits of the proposal, when assessed against the policies in the NPPF taken as a whole. The benefits of this scheme, highlighted throughout this Statement, are significant. Coupled with the amended design, the case for approving this application becomes over overwhelming.

- 9.19. On this basis, the proposal delivers “sustainable development” within the terms of the NPPF, and planning permission should therefore be granted.

# **ANNEX 1**

## **Supply / Demand Assessment – Hindhead**

### ***1. Background***

The purpose of this paper is to assess and determine the need for a new 76-bed care home located on Portsmouth Road, Hindhead, Surrey, GU26 6AL. It is proposed that the new home, to be operated by award winning national operator ‘Hamberley Care Homes’, be developed with a view to welcoming new residents in 2023.

### ***2. Conclusion***

COVID-19 and the potential risks associated with future outbreaks of respiratory diseases has made maximising infection control measures within care home settings an imperative. COVID-19 is likely to accelerate the obsolescence of existing care homes that do not offer ensuite shower or bathing facilities and has highlighted the significant need for purpose built homes designed with infection control in mind. It is for this reason that the proposed development is considered necessary to provide the standard of accommodation that will be required within the local community in the coming years.

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### ***3. Supply/demand analysis***

3.1 There are 25 care homes within the defined catchment area providing 836 ‘ensuite’ bedrooms. Of these bedrooms only 347 have ensuite wet room facilities which allow residents to bathe within their own rooms. The remaining 489 ensuite bedrooms within the catchment area provide solely ensuite WC facilities but no shower or bathing facilities within the rooms. This means that these residents have to share bathing facilities with up to 8 other residents (on average).

3.2 Hamberley’s analysis of need for the new care home is based on the assessed need for ensuite wet room bedrooms. As can be seen from the analysis table below (Figure 1) prepared by leading care home sector specialists Carterwood, there is a demonstrable shortfall of ensuite wet rooms within the catchment.



T06 - Primary year for bed requirement analysis					
Primary year of assessment	2023		Earliest year the subject scheme will be operational		
T07 - Five-year bed requirement (primary catchment) - total market					
Year	2021	2022	2023	2024	2025
<b>Demand</b>					
Estimated demand for beds	833	847	860	872	881
COVID-19 adjustment	-47	-8	0	0	0
Discrepancy capacity allowance	38	79	72	73	74
<b>Total market demand</b>	<b>824</b>	<b>818</b>	<b>932</b>	<b>945</b>	<b>955</b>
<b>Supply</b>					
Current elderly en-suites	836	836	836	836	836
Current elderly wetrooms	347	347	347	347	347
Planned beds	11	11	71	71	131
Subject scheme	0	0	76	76	76
<b>Total supply (en-suites)</b>	<b>847</b>	<b>847</b>	<b>903</b>	<b>903</b>	<b>1,020</b>
<b>Total supply (wetrooms)</b>	<b>358</b>	<b>358</b>	<b>424</b>	<b>424</b>	<b>554</b>
<b>Bed requirement</b>					
Current shortfall (en-suites)	4	81	<b>55</b>	-38	-88
Current shortfall (wetrooms)	423	510	<b>438</b>	451	401

Figure 1 - Carterwood Supply / Demand Analysis

3.3 Demand for beds follows a similar pattern to that of the UK’s growing ageing population resulting in increased demand. It is forecast that demand from individuals aged over 85 will increase in line with the overall growth of the over 85 population over the next 10 years, from 1.6m to 2.4m

By 2023, when the proposed site is set to open, the Carterwood assessment forecasts an undersupply of 438 beds ensuite wet room beds within the catchment, excluding the subject site.

#### 4. COVID-19 and Changing Dynamic of UK Care Homes

4.1 Covid-19 is already changing the way people choose care homes with potential residents looking at infection control measures within care homes when making their purchase decision, and specifically the desire to have one’s own ensuite washing and toilet facilities. 75% of care home beds in the UK do not have ensuite wet rooms and therefore in the vast majority of cases this means elderly care home residents are having to share a bathroom with up to 8 other residents. The ability for individuals to bathe within their own rooms is a vital preventative measure that helps reduce the spread of infection within a care home as well as allowing residents to maintain their dignity.

4.2 The ability to isolate residents for their safety and others and ensure that people have enough space to practice social distancing, has been a key focus area during the pandemic and these two factors are inherent in the design of a future proof Hamberley care home. There has been a clear pattern and evolution of bedroom design over the last 40 years moving from small, confined spaces without washing facilities to the proposed site which includes modern, spacious en-suite wet rooms.



4.3 The result of the pandemic is the likely acceleration in the obsolescence of older care home stock inside which it will become harder to combat infection and meet increasingly stringent regulatory standards.

4.4 The analysis table above (Figure 1) assumes that all of the existing care home stock currently within the catchment area remains in place and operative despite the fact that average age of these homes is 23 years. Of these homes 9 are more than 30 years old.

### 5. Proposed site specifics

5.1 In addition to the provision of wet rooms, and generally larger rooms, corridors and communal areas than the UK average, the proposed care home will include a number of specific design features to increase the longevity and operational use of the home. These include, but are not limited to:

- Installation of visitation suites allowing families to visit relatives without the need of PPE or the risk of transmitting infection
- Thermal scanners to measure temperatures before entering the home
- Air Lock facility within the main Lobby including enhanced extraction whilst Temperatures are being read.
- Additional PPE Stations throughout the home
- Additional hand washing facilities and sanitising stations throughout the home
- Isolation suites
- Enhanced air extraction systems to all day spaces
- Deliveries / staff Lobby with hand washing station to minimise contact with home staff and delivery people.

All of the above design features have been incorporated into the design in order to build a home which is suitable for providing the highest level of care and ensuring the homes built are fit for the foreseeable future.

## **6. Introduction to Hamberley Care Homes**

### **Core values & aims of Hamberley Care Homes**

6.1.1 Hamberley Care Homes provides high quality person-centred elderly care in luxury surroundings across the UK. Our vision is to be the leading provider of truly personalised and holistic care in the UK and a driving force of care innovation.

6.1.2 We are an innovative company, and we like to do things a little differently so that we can provide the best possible care experience for each of our residents.

6.1.3 We've removed the hierarchical structure that you would normally find in a care home, and instead developed a leadership hub and a more dynamic model of working. Staff are universal workers, providing gap-free care, rather than being restricted to only fulfilling certain elements of care provision.

6.1.4 For example, our Homemakers are carers, housekeepers and companions all in one, holistically supporting residents just as they would in the resident's own home.

6.1.5 We also have designated Wellbeing & Lifestyle Coaches to ensure that we create a nurturing and stimulating environment for residents and staff alike. Our coaches consider all elements of wellbeing (social, emotional and physical) and help us create supportive, homely environments that empower our residents to live meaningful lives.

6.1.6 We believe that our unique operational model of Homemakers, Wellbeing & Lifestyle Coaches and an expert clinical team is the most effective way to deliver outstanding care.

6.1.7 Our mission to change the way that high quality, elderly care is delivered in the UK is accompanied by an ambitious growth strategy of acquisitions and strategic developments.

### **Hamberley Care Homes – Unique Homemaker Model**

6.2.1 At the heart of our innovative organisational structure is the Homemaker, a 'universal worker' role which combines the responsibilities of caring, housekeeping and companionship.

6.2.2 Homemakers provide care for our residents, including administering medicines under the guidance of our clinical team. They take care of the general day to day housework, and they also offer companionship and take an interest in the lives of our residents, supporting them with their hobbies and leisure pastimes.

6.2.3 Our Homemakers operate under the expert guidance of our nursing team, who are on site 24 hours a day, ensuring that an exceptional culture of care exists. As our residents' needs change, we adapt the level and type of care to suit them. As well as providing guidance and support to our Homemakers, our nurses are on hand to monitor and assess our residents.

6.2.4 By identifying changing medical needs early, before they cause discomfort, we can significantly reduce hospital admissions. This also means we can reduce any additional stress or disruption to daily life that often delays recovery. Our unique approach ensures our residents

receive continuity of care within a homely environment and families feel secure that their loved one's changing needs can be met.

*"When I first visited, I was struck by the beautiful setting, furnishings and facilities. However, it is the professionalism and warmth of the Homemakers and all the staff at Chawley Grove that has made my mother's stay so happy. The attitude of staff is exemplary"* - Daughter of a Chawley Grove resident

*"My mum's demeanour and outlook on life has become more positive and she is generally happy and enjoying life once more. The staff are always welcoming and courteous. The Homemakers do exactly what it says on the tin"* - Son of a Hamberley Care Home resident

### **Response to Covid -19 and the importance of infection control**

6.3.1 In January 2020 we implemented an early, thorough and urgent response to the threat of COVID-19 to protect our residents under our Keeping You Safe strategy. The steps we took as part of our Enhanced Infection Control Pledge well exceeded industry standards. Our homes closed to non-essential visits from early March 2020, and to any new admissions for 4 months. During this time we released 100+ COVID-19 focused communications. As lockdown measures loosened all our staff signed a COVID-19 commitment to continue prioritising residents' safety (the Hamberley Heroes Promise).

*"Thank you to all the wonderful staff at Nesbit House who are working tirelessly to keep the residents safe and well. They are keeping the residents active and entertained. They always have time to reassure resident's relatives and the Skype calls are wonderful"* – family of a Nesbit House resident

While we still continue to live through unprecedented times, the need to provide the highest quality care for people is greater than ever.

### **Technology and Innovation**

6.4.1 In addition to our unique model of care, wherever possible we use leading technology and connectivity to improve the quality of our resident's lives.

6.4.2 Our mobile care monitoring software assists with creating person-centred care plans for residents, and provides instant and secure access to information. Staff have access to handheld devices containing the software which automatically links a person's assessment to their individual care needs. This ensures residents consistently receive the care they require and allows instant access to information and reporting, improving efficiency and giving staff more time to spend with residents. The system also gives family members the opportunity to engage more and share moments through the Relatives Gateway:

*"One of the things we liked about Caddington Grove was that we could monitor all interventions basically on an hourly update via the home's gateway, this was especially helpful when the home went into lockdown."* – Nephew of a Caddington Grove resident

6.4.3 We have invested in motion activated technology to engage and support our residents living with dementia. The use of these innovations encourages social opportunities and improves wellbeing for our residents through simple, interactive activities.

6.4.4 More recently we have invested in additional computer tablets to ensure that our residents and families have been able to stay connected during lockdown. The additional tablets allow our residents to speak with their loved ones via video call, as often as they'd like.

*“I'm very grateful that my Dad and I can see each other on video-call every day. As he has dementia, it's really important to both of us” - Daughter of a Chawley Grove resident*

6.4.5 By enabling our team to work more efficiently, they can spend more time with residents and build much more meaningful relationships than the traditional model of care allows.

### **Commitment to colleagues and wider stakeholders**

6.5.1 We operate a culture of continuous learning and development and there are clear career progression opportunities for every member of staff. We invest in developing skilled individuals because we know that people are the heart of a happy home and we entrust our team to bring our vision and values to life.

6.5.2 Our Homemakers, for example, receive training in all aspects of care, including medication, dementia awareness and person-centred care. They also have the opportunity to become Homemaker Champions, and once qualified it is their responsibility to source the latest training and share best practice across our staff teams. Our Champions are empowered to innovate at every opportunity to ensure our residents always receive an outstanding care experience.

6.5.3 We are proud to be an active part of the vibrant neighbourhoods in which our homes are located, and prior to lockdown, held regular events and information sessions within our homes. As part of our unique care model each home has a Community Relations Lead (CRL), who is responsible for embedding the home within the local community and we regularly hold events that are open to the general public (subject to Covid-19 restrictions and government guidance).

6.5.4 We are also committed to reducing isolation and loneliness within the older communities around our homes, and during the lockdown period we introduced virtual community quizzes via our Facebook platform to engage with the older communities around us and supported with essentials gift bags for the most vulnerable.

6.5.5 We believe in the value of community, both within our homes and wider society and look forward to welcoming the local community into our homes once again. From choir groups to horticultural meet ups and free weekly cinema clubs, there is always something for the local older community to get involved with.

## **Hamberley Care Homes**

**15<sup>th</sup> March 2021**

Date: 16 February 2022  
Our ref: 383462  
Your ref: WA/2022/00498



Waverley Borough Council

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear [REDACTED]

**Planning consultation:** Erection Of A 74-Bed Care Home (Use Class C2) With Associated Car Parking Landscaping And Vehicular Access Following Demolition Of Existing Buildings And Structures (Revision Of WA/2021/01365)

**Location:** Andrews Of Hindhead Ltd, Andrews, Portsmouth Road, Hindhead, GU26 6AL

Thank you for your consultation on the above dated 08 February 2022 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

## SUMMARY OF NATURAL ENGLAND'S ADVICE

### NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application would:

- have an adverse effect on the integrity of Wealden Heaths Phase II Special Protection Area <https://designatedsites.naturalengland.org.uk/>.

We note that documents have been provided as part of this application which refer to agreed mitigation measures to restrict the residents of the care home to those who not mobile enough to recreate on the SPA themselves, and to ensure that the car park is only used for staff and visitors to the care home facility. These measures must be adequately secured by the Local Planning Authority to ensure the avoidance of impacts upon the integrity of designated sites.

This should include:

- The use of the property is to be restricted to C2 nursing care home.
- The care home shall not be occupied other than by persons of limited mobility who require full time nursing care and/or those who require high dependency e.g. dementia care.
- No self-contained, or residential staff accommodation will be provided on site.
- A covenant will prevent the keeping of pets on the premises (with the exception of assisted living dogs).
- Car parking will be restricted exclusively to staff and visitors through the measures referred to within the latest Parking Management Plan, dated January 2022.

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

In addition, Natural England would advise on the following issues.

### **Landscape advice (Surrey Hills Area of Outstanding Beauty)**

The proposed development is for a site within or close to a nationally designated landscape namely Surrey Hills AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraphs 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals-outside the designated area but impacting on its natural beauty.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex A.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our [Discretionary Advice Service](#).

If you have any queries relating to the advice in this letter please contact me on 07501486040.

We would not expect to provide further advice on the discharge of planning conditions or obligations attached to any planning permission.

Should the proposal change, please consult us again.

Yours faithfully

  
Sustainable Development Adviser – Thames Solent

## Western Planning Committee Update Sheet - 30/03/2022

### **Andrews of Hindhead, Portsmouth Road, Hindhead - WA/2022/00498**

#### **Additional representations:**

The following additional representation from the Haslemere Society has been received since the publication of the Agenda Report:

- The applicant asserts that residents for this are drawn from the local area so there is minimal impact on the local GP surgery. In order for this prediction to be true, the home will have to draw 74 high dependency and end-of-life patients from the GPs existing 12,100 patients, a rate of 0.6% of the population. This is around the level of UK population living in care homes of *any type* in 2020 (based on a government Care Home Analysis paper from April 2020). The data suggests that the GPs are right when they state that care home patients will be a net addition to their workload. Waverley has a duty to ensure that the potential impact on healthcare can be adequately addressed before giving approval of this application.
- The Planning Officer's report refers to a 'demonstrable need' for such facilities in the Borough but does not argue that there is a local need. The PO's report states that the SHMA indicates a need for 396 additional bed spaces in care homes (that is, all forms of care homes). This suggests that the provision of 74 high dependency beds is overprovision even for the Borough as a whole let alone the local area. The GPs clearly explain why it is better to provide these nearer the actual patients.
- To the extent that residents come from outside the Borough (as opposed to outside the current GP surgery catchment area) any benefit of freeing up family homes is also lost.
- Staffing for care homes is already a problem (as set out in the GPs' letter of representation). This is often poorly paid or minimum wage employment and housing for those income groups is already hard to find locally.
- The Officer's report notes the steps the applicant proposes to take to prevent visitors to the nearby Devil's Punchbowl from using its car parking spaces but has nothing to say about the possibility that staff or visitors to the care home will use the National Trust parking or will park on adjacent streets.
- The Officer's report does not respond to the shift to integrated service provision in the Health and Care Bill referred to by the Local GPs and argues that the issues of shortage of healthcare staff and indeed much of the wider issue of healthcare provision, falls outside the remit of planning. If it is indeed true that the Borough cannot prevent the building of a care home in the area when it appears likely to be detrimental to the health and wellbeing of existing residents, then there is clearly a problem with the planning system. While WBC must act within the rules as they stand, it is not unreasonable to ask what steps WBC plan to take to ensure that any detriment is minimised.



**Amendment to report:**

Section 12, entitled 5 Year Housing Land Supply - page 40, replace the second paragraph with the following:

*The Council published its latest Five Year Housing Land Supply Position Statement, with a base date of 1 April 2021 in November 2021. Since then, the Council has published a factual update to the Five Year Supply Position Statement (December 2021). Several appeal decisions have also been issued which examine the Council's five year supply and conclude that the Council cannot currently demonstrate a five year supply. The Council accepts this but considers some of the sites discounted by recent Planning Inspectors should remain in the supply. On this basis, the Council calculates it currently has 4.3 years' worth of housing land supply.*

Replace the last paragraph of this section with the following:

*Whilst the above policies are considered to be out of date, moderate weight can be attached to them given that the Council has not more than 0.7 years from having a five year housing land supply, which is a material factor in considering the weight to be applied.*

**WA/2022/00498** – Erection of a 74-bed care home (Use Class C2) with associated car parking, landscaping and vehicular access following demolition of existing buildings and structures (revision of WA/2021/01365) at ANDREWS OF HINDHEAD LTD, PORTSMOUTH ROAD HINDHEAD GU26 6AL

Applicant: Seetwo Developments Limited and - Hamberley Properties FV (Hindhead) Limited  
Parish: Haslemere  
Ward: Hindhead  
Grid Reference: E: 488637  
N: 135630  
Case Officer: Ruth Dovey  
Neighbour Notification Expiry Date: 01/03/2022  
Expiry Date/Extended Expiry Date: 27/04/2022  
Committee Meeting Date: Western Planning Committee 30/03/2022

RECOMMENDATION That, subject to conditions, permission be **GRANTED**

## 1. Summary

This application is being considered by the Western Planning Committee as it comprises a revision to a previous scheme on this site that was refused by the Western Planning Committee in October 2021.

The proposed development is for a 74 bedroom care home on an existing underused brownfield site that is in a mix of uses including retail, workshop, office and fitness studio. There are also two residential dwellings on the site. The site is an allocated site in the Pre-Submission Local Plan Part 2, although only limited weight can be attached to this due to the Plan not being at an advanced stage.

This application is a revised proposal following a previously refused application on this site WA/2021/01365. The refused application was also for a 74 bed care home on the site. Officers recommended approval of the application but it was refused by the Western Planning Committee on 12<sup>th</sup> October 2021. There was one single reason for refusal relating to the harmful scale, mass and design of the building. This application is for a building of the same size and footprint. However, the elevations have been amended to achieve a more traditional design. Officers are of the view that the revised design is acceptable within the context of the street scene. Whilst the mass of the building has not changed, the more traditional appearance of the building gives it a more domestic appearance which assists in reducing its apparent bulk and mass. Officers are of the view that the proposed development is acceptable.

The principle of the loss of the existing uses on the site and the provision of the care home use were accepted at the time of the previous application and there were no reasons for refusal relating to these considerations. Likewise, car parking and highways matters, ecology, impact on trees, flooding and drainage were also considered to be acceptable and the current proposal does not change any aspects in relation to these matters.

Whilst the Haslemere Neighbourhood Plan has been made since the refusal of the previous application, there are no policies contained within it that would significantly affect the consideration of this application since the last application was refused.

The proposed development is considered acceptable in all respects and is in accordance with the Development Plan. The Council's lack of a 5 year housing land supply means that any harm arising from the proposal needs to significantly and demonstrably outweigh the benefits of the application to be refused. No harm is identified as a result of this scheme, and there are significant benefits in relation to the provision of a type of accommodation for which there is a demonstrable need in the Borough and the improvements to the street scene that the proposal achieves. Approval is therefore recommended.

## 2. Location Plan



## 3. Site Description

The application site is located on the north western side of Portsmouth Road within the settlement of Hindhead. The site contains a mix of buildings in various uses with

the central area of the site comprising a car parking area and the western end being laid to grass.

The buildings are located in the eastern half of the site and comprise a two storey building at the very eastern end of the site (comprising vacant personal training studio on the ground floor with residential accommodation above). A single storey building is attached to this running eastwards (comprising a mix of workshop, showroom and office space), parallel to the site's frontage. Adjacent to this is a detached two storey building that looks like a dwelling although the ground floor is used as an office and showroom. To the rear of these frontage buildings lie two single storey Nissen huts that form part of the garden machinery workshop.

The mix of uses on the site comprise residential with two units on the site (Class C3), industrial workshops (Class B2), retail (Class E) and personal training studio (Class E).

There are some mature TPO'd oak trees that run along the south eastern and south western boundaries of the site. The site's main access is located in the centre of its frontage along the Portsmouth Road but there is also a secondary access towards the rear of the site off Royal Hut Avenue.

To the rear of the site is a run of two storey detached dwellings with a residential development comprising two storey houses and three storey flat buildings to the east. Three detached dwellings run along the western boundary of the site.

The area is mixed in character comprising dwellings, the Stepping Stones School to the east, Moorlands Lodge care home to the south west and a petrol station beyond that.

#### 4. Proposal

The proposal is for a 74 bed high dependency, end of life care home on the site. This means that the care home would be occupied by residents who are mentally and/or physically frail, have mobility problems, suffer from paralysis, or are in need of assistance with the normal everyday activities in life.

The proposal comprises a building that is a mix of three and two and half storeys. The building would sit 15 metres (at its closest) from the front boundary of the site with its main frontage along Portsmouth Road. This frontage would be three storeys in height. Wings at either end of the building extend towards the rear boundary of the site at two and a half storey height.

The front entrance to the building would be on the north eastern elevation of the building facing Royal Huts Avenue. Vehicular access would be from the Portsmouth Road but this would be re-positioned further east along the frontage in comparison to

the existing position. Car parking would be provided at the eastern end of the site with provision for spaces and an ambulance/delivery space.

Areas of amenity space are proposed at the rear and along the front. The TPO'd trees are to be retained and additional planting provided.

With regard to accommodation, each resident would have their own room with ensuite bathroom. There would be a residents' dining room, café, lounge and cinema on the ground floor, three more dining rooms on the first and second floors and two more lounges along with a quiet lounge. Terraces are proposed at first and second floor level on the rear elevation, directly accessed from the lounges on these levels. The ground floor rooms also have direct access onto the areas of amenity space to the front, side and rear of the building.

The building would be relatively traditional in appearance, with various setbacks along the frontage and a varying ridge line. Materials would largely be brick and render although some glazed curtain walling is also proposed.

#### Proposed Block Plan



Proposed Ground Floor Plan



Proposed First Floor Plan



Proposed Second Floor Plan



Proposed front elevation – fronting Portsmouth Road



Proposed rear elevation



Proposed south west elevation



Proposed north east elevation



Street scene plan



5. Relevant Planning History

Reference	Proposal	Decision
WA/2021/01365	Erection of a 74 bed care home (Use Class C2) with associated car parking, landscaping and vehicular	Refused 14/10/2021



	access following demolition of existing buildings and structure.	
WA/2018/0021	Change of use from retail (Use Class A1) to personal training studio (Use Class D2)	Approved 18/04/2018
WA/2016/1833	Outline application with access, layout and scale to be determined for the erection of 2 buildings to provide 37 sheltered apartments for the elderly and 13 retirement cottages (total of 50 dwelling units); associated basement parking, surface garages and surface parking spaces (total of 57 spaces); refuse stores; electric pavement car and cycle stores following demolition of existing dwelling and buildings.	28/04/2018

## 6. Relevant Planning Constraints

Developed Area of Hindhead  
 East Hampshire Special Protection Area 5km Buffer Zone  
 Wealden Heaths II Special Protection Area 400 Buffer Zone  
 Wealden Heaths 1 Special Protection Area 5km Buffer Zone  
 Potentially contaminated land  
 TPO 07/17

## 7. Relevant Development Plan Policies and Guidance

Waverley Borough Local Plan (Part 1): Strategic policies and sites (adopted February 2018):

- SP1 Presumption in Favour of Sustainable Development
- ALH1 Amount and Location of Housing
- ST1 Sustainable Transport
- ICS1 Infrastructure and Community Facilities
- AHN3 Housing Types and Size
- EE2 Protecting Existing Employment Sites
- TCS2 Local Centres
- LRC1 Leisure and Recreation Facilities
- TD1 Townscape and Design
- NE1 Biodiversity and Geological Conservation

- NE2 Green and Blue Infrastructure
- NE3 Thames Basin Heath Special Protection Area
- CC1 Climate Change
- CC2 Sustainable Construction and Design
- CC4 Flood Risk Management

Waverley Borough Local Plan 2002 (retained policies February 2018):

- TC3 Development Within Town Centres
- D1 Environmental Implications of Development
- D4 Design and Layout
- D6 Tree Controls
- D7 Trees, Hedgerows and Development
- D8 Crime Prevention
- D9 Accessibility
- HE14 Site and Areas of Special Archaeological Potential
- HE15 Unidentified Archaeological Sites

Haslemere Neighbourhood Plan 2013-2032:

- H1 Designation and Purpose of the Settlement Boundaries
- H2 Housing Density
- H3 Windfall Development
- H6 High Quality External Design
- H7 Access and Transport
- H8 Water
- H9 Trees, Woodland and Hedgerows
- H10 Dark Skies
- H12 Protecting and Enhancing Biodiversity Through Haslemere's Ecological Network
- H14 Retaining, Protecting and Developing Local Employment
- H15 Retaining, Enhancing and Managing Changes to Retail

Other guidance:

- The National Planning Policy Framework 2021 (NPPF)
- The National Planning Practice Guidance 2014 (NPPG)
- Residential Extensions Supplementary Planning Document 2010 (SPD)
- Council's Parking Guidelines (2013)
- Surrey Vehicular and Cycle Parking Guidance (2018)
- National Design Guide (2019)

In accordance with the National Planning Policy Framework (NPPF) due weight has been given to the relevant policies in the above plans. The weight is made clear in the appropriate paragraphs of the report.

The Waverley Borough Local Plan Part 2: Site Allocations and Development Management Policies has been published and submitted for examination but does not form part of the Development Plan. Given the stage of preparation, some limited weight should be given to the policies in this plan. The degree of weight to be afforded to policies will increase as the preparation of the plan progresses and will depend on the level of objection received to specific policies. The relevant policies are:

- DM1 Environmental Implications of Development
- DM2 Energy Efficiency
- DM3 Water Supply and Infrastructure
- DM4 Quality Places Through Design
- DM5 Safeguarding Amenity
- DM9 Accessibility and Transport
- DM11 Trees, Woodland, Hedgerows and Landscaping
- DM13 Development Within Settlement Boundaries
- DM26 Employment Sites
- DM28 Access and Servicing
- DS03 Land at Andrews, Portsmouth Road, Hindhead

Policy DS03 of the Local Plan Part 2 has particular relevance to this application as it sets out an allocation for this site for a 67 bedroom care home. As with all the policies within the Local Plan Part 2, this policy carries limited weight.

## 8. Consultations and Town/Parish Council Comments

Haslemere Council	Town	No objection. However, concerns are raised over parking provision. The surrounding roads are already full of parked cars and if the number of spaces are found to be inadequate it will seriously inconvenience local residents. It is reasonable to expect that many staff will be using cars to get to the site, so there are concerns about the effect of shift changes on existing traffic, particularly during school drop off and rush hour.
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Grayshott Council	Parish	<p>Objection, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Demand – there are a considerable number of care beds in the immediate vicinity and more beds in this area will not necessarily benefit the local residents. This site could be used for a development of greater benefit to the locality such as affordable housing and small retail outlets.</li> </ul>
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- Impact on infrastructure – Concern that GP surgeries will not be able to cope with the additional demand from this development. Roads and transport will not be able to deal with the additional traffic. Construction would generate pressure on the locality.
- Drainage – sewer plans show drainage from the site will be to the main Headley Road sewer, passing Moorlands Care Home. This sewer is known to be inadequate and causes problems for Moorlands, as well as properties linking into it from Headley Road.
- Mass and scale – the mass and scale of this building, together with the lack of amenity space for residents represents and overdevelopment of the site.
- Parking issue – The number of proposed parking spaces is very inadequate for this size of care home. A Parking Management Plan has been included in the application indicating that the applicant is aware that the parking provision is of concern.

Surrey County Highway Authority	No objection, subject to conditions.
Thames Water	No objection, subject to conditions.
Natural England	No objection, subject to conditions
Surrey Wildlife Trust	No objection, subject to conditions
Lead Local Flood Authority	No objection, subject to conditions
County Archaeologist	No objection, subject to conditions
Environmental Health – Contaminated Land	No objection, subject to conditions
Environmental Health – Air Quality	No objection, subject to conditions
Economic Development Officer	The change of use from retail to a care home with employees would be supported within walking distance

of the village shop and bus stops.

Surrey Police A condition should be attached requiring the development achieve Secure By Design accreditation.

Surrey Archaeologist No objection, subject to conditions.

Grayshott  
Surgery Doctor's

Objection for the following reasons:

- There is an unusually high number of care homes in the area.
- There are already a large number of vacancies in care homes in the local area (27% of beds unfilled). There are not more unfilled beds compared to at the time of the previous application (WA/2021/01365). This care home would not, therefore be meeting the need of the local population.
- The care home will be used for patients to stay temporarily following discharge from hospital to free up hospital capacity. This puts pressure on the GP surgery that has to get to know repeated new patients with complex needs. This situation could be avoided if new care home stock was focussed in specific areas of need.
- There is already a healthcare staffing crisis in the Hindhead area. The care home will generate further competition for the already inadequate supply of nursing and care staff in the area.
- The proposal does not accord with the NPPF as it is not sustainable as the local community is currently unable to adequately staff its existing health services and this will exacerbate the problem.
- The proposal does not comply with the economic objective of the NPPF "to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places at the right time to support growth, innovation and improved productivity.
- The proposal does not support the social objective of the NPPF as the development will not contribute to an integrated society as there is already an excess of care homes in the area. Care homes should, therefore, be spread throughout Waverley.

- The proposal would put an increased strain on local GP services. A care home of the proposed size would on average require half to three quarters of a day of GP time per week for planned care and then there would be unscheduled GP visits on top of this.

## 9. Representations

43 letters of representation have been received raising objection to the proposal on the following grounds:

- Loss of privacy - to properties in Glenville Gardens and Portsmouth Road.
- Loss of daylight and sunlight - as a result of the scale, proximity and position of the building
- Loss of a view - from properties in Glenville Gardens towards Tyndalls Wood.
- Density – 74 bedrooms is excessive.
- Garden space – the development should have more garden space to allow residents to be able to spend time outside.
- Lack of need – there are already too many are homes in the area.
- Parking – The parking provision for the site is inadequate. Parking for staff and visitors will occur in Tower Road and Glenville Gardens. Tower Road is a bus route and is already over-crowded with parking from staff and visitors to other care homes and a local school.
- Drainage – There are frequent drainage issues in the area. Should any further development on this site be permitted, a fundamental restructuring of the drainage network must be implemented.
- Character and design – the building is excessive in size and comprises overdevelopment.
- Construction nuisance – No construction activity, including contractors' vehicles parking, shall take place outside of the site. Residents of both Glenville Gardens and Tower Road must be protected from any intrusion from the works.
- Alternative uses – the site would be better utilised to provide housing for local people, or a small shopping centre, swimming pool or gym, playground or café.
- Health care strain:
  - the proposal will put extra pressure on the local doctors surgery in Grayshott where it is already very difficult to get appointments.
  - There is a large staff shortage in the care industry. This project will not benefit employment in the sector in the Hindhead area, merely deplete existing care homes of their existing staff.
- Ecology – we should not be supporting any more loss of space for wildlife and the development will encroach on surrounding landscape including the nearby Devil's Punchbowl (an SSSI).

One letter of support has been received recognising the need for another care home due to the increase in our ageing population. A nursing home would be preferable to more housing and would have less impact on services in the area.

## 10. Planning Considerations:

Key determining planning considerations include:

- Planning history and differences with previous proposal
- 5 Housing land supply
- Principle and location of development
- Loss of existing uses
- Provision of care home
- Impact on the Area of Special Protection
- Design and impact on visual amenity
- Access, parking and highway impact
- Impact on residential amenity
- Quality of accommodation
- Flood risk and foul drainage
- Trees and landscaping
- Ecology
- Archaeology
- Contaminated land
- Energy and sustainability
- Impact infrastructure
- Tilted balance

## 11. Planning history and differences with previous proposal

The planning history is a material consideration.

A planning application was refused on 14/10/2021 for the erection of a 74 bed care home (Use Class C2) with associated car parking, landscaping and vehicular access following demolition of existing buildings and structure.

The reason for refusal is as follows:

*The proposal, by virtue of its scale, mass and design would result in a cramped and crowded layout that would fail to take the opportunity available for improving the character and quality of the area and the way it functions. As such, it would harm the character of the surrounding area and street scene. This would conflict with Policy TD1 of the Local Plan Part 1 2018, Retained Policies D1 and D4 of the Local Plan 2002, the Haslemere Design Statement 2012 and paragraphs 126 and 130 of the NPPF 2021.*

The current application is similar to that previously refused in a number of ways. It proposes the same use (end of life care home in Class C2 use) and the same number of bedrooms (74). The footprint and floor plans are the same as is the height and scale. There is no change to the block plan as the building occupies the same position on the site and the site's access and the location and scale of car parking provision is the same. The main difference, therefore, relates to the treatment of the

elevations. The current proposal incorporates some traditional design features that did not form part of the refused application.

The elevations of the refused application are shown below:

Elevation to Royal Huts Avenue



Elevation to Portsmouth Road



Proposed south west elevation





Proposed north west elevation



The main question, therefore, is whether the proposal has overcome the reason for refusal on WA/2021/01856. Since the refusal of this application, the Haslemere Neighbourhood Plan has been made and this document therefore forms part of the Development Plan. Consideration should also be given, therefore, to this Neighbourhood Plan and whether there are any policies within it that affect the assessment of the current application.

## 12. 5 Year Housing Land Supply

Whilst the proposal does not provide conventional residential dwellings (being in C2 use rather than C3 use), it does make a contribution towards the Council's 5 year housing land supply as it is recognised that it is providing some form of residential accommodation, albeit, one room would not necessarily equate to 1 dwelling. Using a formula set out in the Housing Delivery Test Measurement Rulebook, this is calculated to be 41 dwellings. Therefore, the Council's 5 year housing land supply position is relevant to the consideration of the application.

The Council published its latest Five Year Housing Land Supply Position Statement, with a base date of April 2021, in November 2021. Since that time, two appeal decisions have examined the Council's supply and concluded that it has 4.24 years' worth of housing land (Land at Scotland Lane, APP/R3650/W/21/3280136) and 4.02 years' worth of housing land supply (Land west of Loxwood Road, APP/R3650/W/21/3278196) respectively. Whilst the conclusions of the Inspectors regarding the delivery of some of these sites is disputed, the Council accepts that some of the sites examined within those appeal decisions should be discounted and that it cannot currently demonstrate a 5 year housing land supply. The Council therefore calculates it has between 4.47 years' and 5 years' worth of housing land supply.

As the Council cannot presently demonstrate a Five-Year Housing Land Supply, paragraph 11(d) of the NPPF 2021 is engaged via footnote 7. Therefore, unless the

site is located in an area, or involves an asset, of particular importance that provides a clear reason for refusal, then permission must be granted unless it can be demonstrated that any adverse impacts demonstrably outweigh the benefits when assessed against the Framework as a whole.

For the purposes of paragraph 11(d) of the NPPF, the most important policies for the determination of this application are those that relate to the principle of the acceptability of the development.

A table containing those policies and the weight to be accorded to them are set out below:

<b>Local Plan Part 1 Policies</b>	<b>Weight</b>
SP2 – Spatial Strategy	Moderate
ALH1 – Amount and location of housing	Moderate
AHN3 – Housing types and size	Moderate
Policy EE2 – Protecting existing employment sites	Moderate
Policy TCS3 – Neighbourhood and village shops	Moderate
Policy LRC1 – Leisure and recreation facilities	Moderate
Policy ALH1 – Amount and location of housing	Moderate

<b>Haslemere Neighbourhood Plan Policies</b>	<b>Weight</b>
H1 – Designation and purpose of settlement boundaries	Moderate
H14 – Retaining, protecting and developing local employment	Moderate

Whilst all the above policies are considered to be out of date, moderate weight can be attached to them given that the Council is no more than 0.33 years from having a 5 year housing land supply, which is a material factor in considering the weight to be applied.

### 13. Principle and location of development

The Local Plan Part 1: Strategic Policies and Sites sets out the strategic policies relating to the development and use of land in Waverley and development proposals for the strategic sites identified within it. The Local Plan Part 1 directs new development in the Borough for the period up to 2032.

Policy SP1 stipulates that where planning applications that accord with the Policies in the Local Plan Part 1 (2018) will be approved without delay unless material considerations indicate otherwise.

Policy SP2 details the Spatial Strategy to ensure development needs are met in a sustainable manner which maintains Waverley's character up until 2032. Policy SP2 sets out the general approach to spatial strategy for the Borough and seeks to focus development at the four main settlements – Farnham, Godalming, Haslemere and Cranleigh (of which Farnham is the largest). This policy also maximises opportunities for the redevelopment of suitable brownfield sites housing, business, or mixed use. This is in line with paragraph 119 of the NPPF which states that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

Policy ALH1 details the amount and location of 11,210 net additional dwelling in the period from 2013 to 2032 to meet the full, objectively assessed needs for market and affordable housing. Hindhead forms part of the settlement of Haslemere which is allocated 990 homes between 2013 and 2032.

Policy H1 of the Haslemere Neighbourhood Plan states that development proposals within the settlement boundaries that comply with development plan policies will be supported.

The site is located within the settlement of Haslemere and provides the equivalent of 41 dwellings. Being located in the settlement, the site is considered to be in a sustainable location. The site comprises previously developed land that is currently underused and there is an opportunity to make more efficient use of it through its redevelopment to provide a much needed care home that would make a contribution to the Council's supply of housing.

Notwithstanding the consideration of the loss of the existing land uses (as detailed in the section below) the proposal would accord with Policies SP1, SP2 and ALH1 of the Local Plan Part 1, all of which seek to increase the supply of housing within the settlements. The proposal also accords with Policy H1 of the Haslemere Neighbourhood Plan.

#### 14. Loss of existing uses

The application site currently comprises mix use buildings which include offices (Class B1), residential (2 dwellings) (Class C3), industrial workshops (Class B2), retail (Class E), and storage (Class B8). There is also a vacant personal training studio (Class E).

Local plan policies seek to protect existing employment, retail and leisure uses.

Policy EE2 states that the Council will permit the change of use of existing employment sites to residential and other alternative uses where it can be reasonably demonstrated that there is no reasonable prospect of the site being used for employment use. Paragraph 10.33 of the Local Plan Part 1 states that where a

proposal involves the loss of an existing employment use, this must be supported by evidence that demonstrates that there is no reasonable prospect of the site being used or re-used for these purposes. This should include, amongst other things, the length of time the property has been unused for use classes B1 to B8, the length of time during which it has been actively marketed for uses B1 to B8 purposes which should include the possibility of redevelopment and should provide evidence of the marketing and an explanation as to why the buildings are physically unsuitable for use classes B1 to B8 use even after adaptation, refurbishment or redevelopment.

The policy goes on to state that where there is an identified need for new homes, the Council will normally approve applications for a change to residential use and any associated development from employment uses, subject to there being no strong economic reasons why such a development would be inappropriate.

Retained policy IC2 of the Local Plan 2002 seeks to resist the loss of suitably located industrial and commercial land. Site will be regarded as being suitable located where they meet on or more of the following criteria:

- a) The continued use of the site for commercial or industrial purposes would not have a materially adverse impact on the local environment or the amenities of nearby residents.
- b) They would lie within or close to residential areas which can provide as source of labour;
- c) They are conveniently located to customers/markets and to other firms;
- d) They are located where the highway network can satisfactorily absorb the traffic generated; and
- e) They are conveniently service by public transport and/or conveniently accessible from nearby residential areas by walking/bicycle.

Policy IC2 requires that in giving consideration to applications which conflict with this policy, the Council will require the applicant to demonstrate that there is no need for the site to be retained for employment purposes. The site is considered to accord with all the above criteria and therefore its loss could potentially conflict with this policy.

Policy TCS3 of the Local Plan Part 1 relates to neighbourhood and village shops and states the Council will support the provision of small scale local facilities to meet local needs. Where planning permission or prior approval is required, the Council will resist the loss of shops and services which are deemed important to the community. Proposals for the loss of shops will need to demonstrate that the continuing use is unviable.

Policy LRC1 of the Local Plan Part 1 states that development involving the loss of indoor leisure, recreation and cultural facilities, or their change of use, will be granted permission if evidence demonstrates that:

- a) The existing use is no longer required;
- b) No other leisure, recreation or cultural provision is required or appropriate in that area;
- c) Alternative provision of a suitable scale and type and in a suitable location can be made; or
- d) The development is for an alternative leisure, recreation or cultural provision, the needs of which clearly outweigh the loss, and it can be demonstrated that there are no reasonable alternative sites available.

Policy H14 of the Haslemere Local Plan relating to local employment states that proposals for the change of use of existing employment sites to residential and other alternative uses will be supported where it can be clearly demonstrated that there is no reasonable prospect of the site being used for employment use.

As the Council do not have a 5 year housing land supply, only moderate weight can be attached to these policies.

The applicants have submitted a report from Clarke Gammon (estate agents, valuers, chartered surveyors and auctioneers) in relation to the existing uses on the site. They advise that they carried out an internal and external inspection of the premises on 5<sup>th</sup> February 2021. They advise that the buildings are dated and in poor condition. They have been adapted over time to suit the Andrews of Hindhead business operation. It is not perceived that the existing layout would be suitable for many commercial operators, owing to the different range of buildings and the standard of construction and state of repair. The accommodation is in a dilapidated condition with restricted height and access and would require a full upgrade/reconstruction in order to meet occupier's modern requirements. Furthermore, significant capital investment would be required to meet minimum energy performance standards.

With regard to demand, there is a lack of passing trade as a result of the opening of the Hindhead tunnel and that Hindhead is typically a local market with a couple of destination shops. Commercial occupiers have a tendency to be situated in larger towns of Haslemere, Grayshott, Bordon, Farnham and Guildford. The report concludes that should the site be let in its existing use and configuration, there would be little or no demand. Should the site be redeveloped for commercial use, it would be difficult to let with limited demand.

The report also considers supply. There are currently 251 industrial/commercial buildings being advertised as available in Haslemere, Grayshott, Bordon, Godalming, Farnham and Guildford (as per a database of available commercial properties). In light of the availability of the large number and range of unit sizes in the area and in the context of the size of the market and demand, Clarke Gammon consider this to be a considerable over-supply. They are also of the view that, as a result of the Covid-19 pandemic, it is a reasonable assumption that more properties will come to

the market once lockdown is lifted and the realities of market forces impact on the property market.

The report does not specifically address the loss of the D2 unit that is currently vacant, however, the applicant has advised that the considerations within the Clark Gammon report for the retail use are relevant to the D2 use.

Whilst the application is accompanied by a report from Clark Gammon, no marketing information has been submitted to support the loss of the existing uses. With regard to loss of employment use, it is anticipated by the applicants that the care home would provide employment for 69 full time employees. The site would, therefore, provide long-term employment opportunities. With regard to the loss of the retail use, it is noted that the requirements of TCS3 relate to small scale facilities to meet local needs and which are important to the community. The subtext of this policy refers to neighbourhood and village shops providing facilities and services to meet the day to day needs of neighbourhood and village communities. This policy is therefore targeting village shops providing convenience goods. It is not considered that a lawn-mower shop fits within this bracket.

The existing site comprises an unusual mix of uses and the buildings appear to be run down. Officers agree with the Clarke Gammon report that it would be difficult to attract potential new occupiers to the site in its current state.

On this basis, the loss of the employment and retail use is considered to be acceptable despite the lack of marketing evidence.

With regard to the loss of the personal training studio, this unit is modest in size at 47 sq m in area. The use became active in 2018 but the personal training studio is now vacant. The operator ceased trading and the studio was closed in March 2020 and has never re-opened. The business has since gone into liquidation. The applicant advises that such a small unit was and remains unsuitable for this type of use due to the challenges of operating such a small unit whilst ensuring that health and safety and hygiene standards were/are adhered to. The operator tried a number of alternative strategies but none of them worked. They concluded that the building was not commercially viable and so ceased trading. The fact that the floor area of the unit is small and that it only lasted for the short term and therefore did not become well established mean that Officers are satisfied that its loss is acceptable.

The 2016 planning application would also have resulted in the loss of employment and retail accommodation (personal training use had not occurred at this time). Of note is that this application was not refused on the grounds that the development resulted in a harmful loss of existing retail and employment uses and it is not considered that there are any changes in either on site or off-site circumstances since this application to indicate that a different approach should be taken now in relation to these uses.

Furthermore, the site is allocated for a 67 bedroom care home site within the Pre-Submission Local Plan Part 2. Whilst only limited weight can be applied to this policy given the stage of the plan and that the Council received objections to this policy, it does indicate the direction of travel for the site and that the existing uses are not considered to be worthy of retention. It also recognises the site as a redevelopment opportunity.

Officers therefore consider the loss of the existing uses acceptable. Any policy conflict arising from the proposal would not be significant. In relation to Policy EE2 of the Local Plan Part 1 and H14 of the Haslemere Neighbourhood Plan, there is an identified need for new homes and there are no strong economic reasons as to why such a development would be inappropriate. With regard to Policy TCS3, the lawn mower shop cannot be described as a shop that meets local needs, such as a convenience store. The modest nature of the personal training studio and the fact it failed within two years means that its loss would not be harmful to the supply of indoor leisure and recreational opportunities.

When considering the loss of the existing uses, it is pertinent that the council does not have a 5 year housing land supply. Therefore, only moderate weight is attached to the above policies.

The proposal would result in the loss of two residential dwellings (Class C3). However, as the proposal is for a form of residential accommodation that is calculated to be the equivalent of 41 dwellings, a significant uplift over the existing situation, the proposed development is considered acceptable and, in fact, this uplift is a significant benefit to the scheme.

The loss of the existing uses is considered acceptable and broadly in accordance with Policies EE2, TCS3 and LRC1 of the Local Plan Part 1 and Policy H14 of the Haslemere Neighbourhood Plan.

## 15. Provision of Care Home

The site is allocated for a 67 bedroom care home within the Pre-Submission Local Plan Part 2. However, for reasons outlined above only limited weight can be attached to this policy although it does indicate the direction of travel for the site, recognising its redevelopment potential.

Whilst the proposal is not for residential dwellings, rather a high dependency, end of life care home, as it is providing a form of residential accommodation, Policy ALH1 is relevant. This policy details the amount and location of 11,210 net additional dwelling in the period from 2013 to 2032 to meet the full, objectively assessed needs for market and affordable housing.

Policy AHN3 of the Local Plan Part 1 seeks to ensure that proposals for new housing make provision for an appropriate range of different types and sizes of housing to

meet the needs of the community, reflecting the most up to date evidence in the West Surrey Strategic Market Assessment.

The policy goes on to state that the Council will support the provision of new housing and related accommodation to meet the needs of specific groups that have been identified in the SHMA which currently indicates specific needs for older people (aged 65 and over). Whilst there have been many objections in relation to the need for the facility, the SHMA indicates that there is a need for more accommodation to serve the needs of the elderly within the Borough.

Paragraph 9.20 of the SHMA provides some context to this and states that the HMA (in line with other areas) is expected to see a notable increase in the older person population with the total number of people aged 65 and over expected to rise by 48% over the 20 years from 2013. This compares with the overall population growth of 14% and growth in the under 65 population of just 6%.

Paragraphs 5.12, 5.13 and 5.14 of the SHMA Waverley Summary Report identify that within Waverley, a growing older population may result in an increase in the number of people with dementia by around 1,800 between 2013 and 2031, with a growth in the number of persons with mobility problems of over 3,500. Further, it is recognised that some older households will require specialist housing solutions. The SHMA identifies a need for 1,700 additional specialist housing units (including sheltered and extra care homes) in Waverley. The SHMA indicates a need for 1031 bed spaces in care homes of which 396 are in Waverley.

Paragraph 1 of the National Planning Guidance of Housing for Older and Disabled People states that “the need to provide housing for older people is critical. People are living longer lives and the proportion of people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. 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”.

Officers acknowledge that there are already a number of care homes in the vicinity of the site and that there is a general perception that no more self-funder care homes are needed. However, planning policies do not provide a limitation on care homes within a given area. The site is a brownfield site of which more efficient use could be made and the proposal would satisfy a borough-wide need for additional specialist units for housing for older people.

The proposed use does not conflict with any policies contained within the Development Plan. In fact, the proposal accords with Policy SP2 as it maximises the opportunity for redevelopment of a suitable brownfield site for housing (recognising that the nature of the housing as an extra care residential home). The development also complies with Policy AHN4 by providing a type of accommodation for which



there is a recognised need in the Borough. There is, therefore, no policy justification to refuse the application on the basis that the proposed use is not required.

Paragraph 60 of the NPPF supports this position as it states that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”. Paragraph 62 of the NPPF confirms that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. The definition of ‘older people’ within the NPPF is “people over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs”.

The proposed development is therefore considered to accord with Policies SP2 and AHN3 of the Local Plan Part 1 and paragraphs 60 and 62 of the NPPF and is therefore acceptable in principle.

The provision of a care home which satisfies a specific Borough wide housing need and which contributes 41 dwellings to the Council’s supply of houses is considered to be a significant benefit of the proposal to be weighed in the planning balance. It should also be noted that this care home would potentially free up family housing resulting from occupants leaving their family homes.

#### 16. Impact on the Area of Special Protection

Policy NE1 of the Local Plan Part 1 2018 states that where new development is proposed that would result in a net increase in residential accommodation within 400m of the boundary of Thursley, Hankley and Frensham Commons (Wealden Heaths Phase 1) SPA and Wealden Heaths Phase II SPA, the Council will need to be satisfied that there will be no significant adverse effects on the ecological integrity of the SPA through project level Habitats Regulation Assessment (HRA).

The site is located within 400m of the Wealden Heath Phase II Special Protection Area (SPA) due to its proximity to the Devil’s Punchbowl. It is also located within the 5km Buffer Zone of the Wealden Heath 1 SPA.

The proposal would result in an increase in people (permanently) on the site and could have a harmful impact on the SPA. An appropriate assessment has therefore been carried out. This concludes that whilst a conventional C3 use would be considered to have a harmful impact on the Wealden Heaths I and II SPA, as a result

of a potential increase in visitor numbers that would arise, the proposed use would be acceptable subject to the following condition:

The care home hereby approved shall only be used as a Class C2 care home and be occupied solely by persons who are mentally and/or physically frail; have mobility problems; suffer from paralysis or partial paralysis; or are in need of assistance with the normal activities of life. The building shall not be used for any other purpose within Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended) or any other statutory instrument and notwithstanding any provisions either in force or enacted at a later date there shall be no permitted change of use. There shall be no self-contained or staff accommodation within the approved development and there shall be no dogs or cats at the premises at any time (other than assisted living dogs).

Through this condition, the occupants of the care home would be limited to those that would not be in a position to visit the SPAs due to their physical and/or mental condition. On this basis, the proposed development is considered unlikely to cause harm to the Wealden Heaths I and II SPAs.

A Car Parking Management plan has been submitted with the application at the request of Natural England in order to ensure that the car park for the care home is not used by members of the public wishing to visit the Devil's Punchbowl (Wealden Heath's II SPA). The car parking management plan sets out a number of measures that the applicant will put in place to ensure that there is no misuse of the car park. These include providing signage stating that the car park is private and confirming that visitors to the care home need to provide their registration number to reception on arrival to enable use of the car park to be monitored. CCTV cameras will be installed to record activity in the car park and act as a deterrent. Permits will also be issued to staff and visitors and a private car park enforcement company would be appointed to implement a system of issuing parking charge notices to unauthorised users. Natural England has reviewed the proposals and considers that the Car Parking Management Plan is sufficient to overcome their concerns in this respect.

Natural England has considered the condition that restricts the occupancy of the care home and is satisfied that, with the imposition of this condition, together with the provision of the Car Parking Management Plan, that the proposed development would not have a harmful impact on the SPAs.

It was noted at the time of the previous application that many local residents considered that this site could be better used to provide housing, and in particular affordable housing. However, the site's proximity to the Wealden Heath II SPA precludes this.

Subject to a condition restricting the occupancy nature of the development, and that the use is carried out in accordance with the Car Parking Management Plan

accompanying the application, the proposed development is considered to accord with Policy NE1 in relation to impact on the SPAs.

## 17. Design and impact on visual amenity

Policy TD1 of the Local Plan (Part 1) 2018 requires development to be of high quality design and to be well related in size, scale and character to its surroundings. Retained Policies D1 and D4 of the Local Plan 2002 are attributed substantial and full weight respectively due to their level of consistency with the NPPF 2019.

Policy H6 of the Haslemere Neighbourhood Plan states that development proposals should respond positively to the relevant sections of the Haslemere Design Statement, as appropriate to their scale. In particular, proposals should be of a high quality design and respect the character and appearance of the surrounding area. A number of criteria set out how this should be achieved, the most pertinent of which are set out below:

- Recognising the scarcity of land within the area's settlement boundaries and fulfilling the intentions regarding density, of Policy H2, while avoiding overdevelopment of the plot in relation to the characteristics of neighbouring plots in respect of built form, massing and the building line;
- Integrating with the existing settlement

Policy H2 relates to housing density and states that the density of development proposals should be consistent with the character, appearance and topography of their immediate locality and the delivery of high quality designs. Whilst conventional housing is not proposed in this application, the objective of this policy is considered relevant as a care home comprises a form of residential accommodation.

The existing site comprises a number of run-down buildings including two nissen huts at the rear. The buildings vary in character and style and there is little visual cohesion between them. None of them have particular architectural merit. There is therefore an opportunity, in redeveloping the site, to improve its contribution to the street scene and provide a development that is more responsive and makes a more positive contribution to its surroundings.

The proposal comprises a three storey building along the frontage with Portsmouth Road reducing down to two and half storeys for both rearward projecting returns at either end of the building.

The design of the building has changed since the more contemporary approach taken with the previous application. Through the provision of pitched roof dormers rather than flat roof dormers and pitched roofs over projecting bays, the current design has a more traditional feel, however, the design still incorporates a staggered front building line and variations in the height of the ridge. The materials are similar to

those previously proposed, including the use of render, brick, tilehanging and glazed walling although the current proposals see a higher proportion of brickwork to render used in three of the four elevations (the rear elevation being the exception).

The area is characterised by a mix of architectural style, scale and type of development. Whilst there are relatively traditional two storey residential dwellings that sit down from the Portsmouth Road opposite the site, there is a three storey flat block immediately to the north east of the site fronting Portsmouth Road. Moorfields, another residential care home, sits further along the Portsmouth Road, south west of the site. This is a prominent three storey building. Within the site's vicinity, there is also a petrol station with convenience shop and Stepping Stones School.

Within the context of surrounding development, the scale of the proposed building is considered acceptable. The building's mass is also considered appropriate to the site, with sufficient space along the frontage and to the sides and rear to ensure that the building would not appear cramped within the site. The space around the building provides an opportunity for a well-designed landscaping scheme that includes retaining the existing trees along the site's frontage and along the south western boundary of the site.

Officers note that the reason for refusal on the previous application refers to the building's scale, mass and design resulting in a cramped and crowded development. It is noted that the scale of the building has not been reduced in comparison to the refused scheme. However, the more traditional design of the building gives it a more domestic appearance which assists in reducing its apparent bulk and mass.

With regard to detailed design considerations, the traditional approach with hints of contemporary design is considered appropriate in this area that is mixed in character. The variation in the building line, ridge height and materials are design features that all add interest to the building. Overall, the design, bulk and mass of the building is considered acceptable.

With specific regard to Policy H2 of the Haslemere Neighbourhood Plan that relates to density, the proposed development is considered to accord. Three storey buildings of significant scale feature along this part of Portsmouth Rd (examples are Moorlands Care home and the Royal Hut Avenue development). In this respect, the density of the development proposal is consistent with the character, appearance and topography of the immediate locality, as required by Policy H2.

The proposal also includes a landscaping scheme. This consists of the provision of a native hedge on the front boundary, the planting of some new trees (a mix of ornamental, silver birch, rowan, hazel and holly) along the north eastern boundary, within the car park and on the rear boundary and areas for planting. It is considered that a high quality landscaping scheme as shown on the landscaping scheme submitted with the application, would complement the building, soften its edges and further enhance the street scene.

The proposed development significantly enhances the appearance of the site within the street scene in comparison to the existing and its scale and design is in keeping with the surrounding context. The proposal therefore accord with Policies TD1 of the Local Plan (Part 1) 2018, Policies H1 and H2 of the Haslemere Neighbourhood Plan 2013-2032 and retained Policies D1 and D4 of the Local Plan 2002 and the Residential Extensions SPD.

## 18. Access parking and highway impact

Policy ST1 of the Local Plan 2018 (Part 1) states that development schemes should be located where they are accessible by forms of travel other than by private car, should make necessary contributions to the improvement of existing and provision of new transport schemes and include measures to encourage non-car use. Development proposals should be consistent with the Surrey Local Transport Plan and objectives and actions within the Air Quality Action Plan. Provision for car parking should be incorporated into proposals and new and improved means of public access should be encouraged.

Policy H7 of the Haslemere Neighbourhood Plan states, amongst other things that all major development should:

- Provide safe, direct routes for pedestrians and cyclists from the site to existing routes;
- Make improvements to existing pedestrian and cycle access immediately adjacent to the site at the time of the build;
- Provide a travel plan to demonstrate how the development will improve local traffic and pedestrian management; and
- Be designed to be accommodated satisfactorily on the local highway network.

A Transport Statement prepared by Development Transport Planning forms part of the suite of application documents. This considers the level of traffic that is likely to be generated by the proposed development. It sets out that the existing use generates between 130 and 136 traffic movements to the site per day. By comparison, the care home would generate 11 vehicle movements per hour in the morning peak (8-9am), 12 vehicles per hour in the evening peak (5-6pm) and 124 vehicle movements daily (7am to 7pm). It advises that the daily traffic flows are similar to the accepted vehicle flows from the existing land uses at the site. The peak hour flows are very low and there would be no material traffic impact on the highway network.

In terms of parking provision, the proposal includes 38 car parking spaces and one ambulance/delivery vehicle space. Surrey County Council's Vehicular and Cycle Parking Guidance 2017 and Waverley Borough Council's Car Parking Standards 2013 state that 1 car parking space should be provided per 2 residents or individual

assessment/justification. The proposed development, with 74 bed spaces, would need 37 car parking spaces. The proposal exceeds this guideline by one space.

The report goes on to consider in more detail whether this level of car parking is sufficient when considering the traffic generation from the development. The transport consultant has used TRICS data for survey data to justify the level of car parking provision that is appropriate for a development of this use and scale. The TRICS survey data includes a variety of information such as the number of beds; the number of car parking spaces provided, and the total parking demand observed on site. An analysis of the TRICS data has been carried out to identify car parking provision and demand at the existing care home developments. Only sites with at least 50 beds have been considered. This analysis shows that the average car parking provision for these types of units is 0.4 spaces per bed. The average observed demand is 0.26 spaces per bed with a maximum of 0.51 spaces per bed.

The proposed 39 spaces (including the ambulance and delivery vehicle space) is equivalent to 0.51 spaces per bed and is 27% higher than the average level of provision at the existing care home sites included in the TRICS. It is also equivalent to the maximum level of observed parking demand.

As the number of staff that drive to work are a significant determinant of car parking demand for care homes, the report includes a staff schedule for the proposed care home. This sets out that the number of staff on duty will be highest during the day time with the number on duty in the week reaching 32 on weekdays. Overnight the maximum number of staff on duty will be 12 and at weekends, during the day, it will be 27. A staggered shift pattern used by Hamberley minimizes the potential for doubling up of staff on site.

Data from the Journey to Work Census 2011, has been interrogated as to the number of people within the Hindhead area who drive to work and this is about 72% of people. On this basis, the peak demand for staff car parking would be 23 spaces on a weekday, 9 spaces overnight and 20 spaces on weekends. This would leave at least 16 spaces available for visitors during the week and 19 spaces available at weekends.

The Transport Consultant has considered data from two existing care homes in order to inform visitor parking demand for the development proposal. This shows that there was an average of 0.43 visitors per resident per day, ranging from 0.29 per resident on the quietest weekday to 0.54 per resident on Saturday which is the busiest day. For the proposed 76 bed care home (based on the original plans submitted with the application), this equates to an average of 32 visitor trips per day with a range of between 23 and 38 visitor trips.

The survey of visits included the times of arrival and departure and the average duration of stay as about 1.5 hours. The peak arrival on weekdays was between 2pm and 4pm and at the weekends it was between 10am and midday. Detailed analysis of

the data indicates that visitor parking demand on the average weekday would be up to 8 cars and on a Saturday would be up to 12 cars.

This analysis shows that the peak demand for parking from staff and visitors can be expected to be 31 on weekdays and 32 on weekends, well within the car park capacity.

The application is accompanied by a Travel Plan that seeks to reduce the reliance of staff on the private car. Measures within this Plan include the appointment of a Travel Plan Co-ordinator to resume overall responsibility for the Travel Plan, the provision of information packs to make staff aware of alternative transport options other than the car, provision of changing and shower facilities for those who choose to walk or cycle to work, provision of cycle maintenance equipment and the promotion of car sharing. The Travel Plan sets a 5 year target for a 10% reduction in the base level of car driver.

The development incorporates the provision of 5 cycle parking spaces. The County Council's Cycle Parking Standards indicate that for C2 uses the level of provision is down individual assessment. The Travel Plan sets out that this will be reviewed to match the required demand in the future, and this can be secured by condition. The proposal also includes the provision of 4 electric vehicle charging points.

The County Highway Authority has reviewed the proposals and the accompanying transport information. On the basis of the analysis and information provided, they are satisfied that the level car and cycle parking provision. It confirms that the County Highway Authority is satisfied that the proposal would not result in a significant increase in traffic generation and that the proposal is unlikely to have a material impact on highway safety issues. The County Highway Authority therefore raises no objection, subject to conditions.

On this basis, Officers are satisfied that the development accords with Policy ST1 of the Local Plan Part 1 2018 and Policy H7 of the Haslemere Neighbourhood Plan 2013-2032.

#### 19. Impact on residential amenity

The proposed development would not result in harm to the residential amenity of neighbouring properties in accordance with Policy TD1 of the Local Plan Part 1 2018, retained Policies D1 and D4 of the Local Plan 2002 and the Residential Extensions SPD. Policy H2 of the Haslemere Neighbourhood plan 2013-2032 seeks to ensure, amongst other things, that the residential amenity of neighbours protected.

##### No. 1 Royal Huts Avenue

No. 1 Royal Huts Avenue is located to the rear of the site and its side flank wall runs parallel to the site boundary. There is a stretch of land (formerly and alternative access to the Andrews site) that sits between the main flank wall of this dwelling and

the application site. The north eastern wing of the buildings site 8.2m from this boundary. In accordance with the Council' Residential Extensions SPD, the development would not infringe an angle of 45 degrees when measured either from the edge of the ground floor conservatory, or from the centre of the closest habitable window at first floor level. Therefore, no harmful loss of daylight would result to this dwelling.

With regard to outlook, the dwelling faces south west with views towards the rearmost section of the application site and the rearmost parts of the gardens of the Glenville Garden properties. As the building would not encroach across these views, it is not considered that any loss of outlook would result.

No habitable windows are positioned in the rear wall of the development closest to this dwelling (at the end of the north eastern wing of the building). There are habitable room windows on the main rear elevation of the building. These are located 18m from the boundary that the site shares with No.1 Royal Hut Avenue in accordance with the Council's Residential Extensions SPD which sets a guideline figure of 18m between proposed windows and neighbouring private amenity space.

There are communal terraces proposed at first and second floor level on the rear elevation of the main building leading out from a lounge on each floor. At their closest, these terraces would be 15m away from the boundary with no. 1. However, the distance between the terrace and the main amenity area of this property (the part of the garden closest to the house) would be 25m. This is considered to be sufficient to ensure no harmful overlooking results.

A refuse store is located approximately 2.5m from the boundary with this property. Whilst elevations of this refuse store have not been submitted it is anticipated that it would be single storey and therefore would not harm light or outlook to no. 1.

#### Nos. 20 and 21 Glenville Gardens

Nos.20, 21, 22 and 23 Glenville Gardens all back on to the site. Nos. 20 and 21 Glenville Gardens sit at an angle to the site which means they would also sit at an angle to the proposed building rather than facing directly towards it. Due to the angles of the buildings to each other the distance between them varies. At its closest, the building would be 18m from the rear boundary of no. 21 Glenville Gardens and 34m to the nearest rear windows in this property. At its farthest, it would be 21m from the shared boundary and 38m from the nearest rear windows. The building would be approximately 8.7m in height to the eaves and 13m to the ridge. The relative distance to height of the building from no. 21 Glenville Gardens means that it would not infringe an angle of 25 degrees from the rear windows of this property, in accordance with the Residential Extensions SPD. As the development is three storeys in height, there should also be a rear elevation to rear elevation distance of at least 26m. This standard is satisfied.



Impact on sunlight is also a relevant consideration. From midday, when the sun is due south of the site and at its highest, the extent of shadows cast by the care home building will be minimal and not in the direction of the Glenville Gardens that lie to the north west. As the sun moves to the west in the afternoon and evening the shadows from the care home will be cast more towards the east and therefore away from these rear residential gardens that lie to the west. There may be some impact on sunlight to these properties in the morning when the sun rises from the east but given the distance of the building from these properties, and the fact that they will still enjoy afternoon sun, this is not considered significant.

As no. 20 Glenville Gardens is located further away from the proposed building than no. 21 Glenville Gardens, daylight and sunlight impacts to this property are found to be acceptable.

With regard to outlook issues, officers acknowledge that the outlook from the rear of these properties will change quite significantly given that the scale of development is greater than currently. However, given the distances involved relative to the height of the development, it is not considered that a harmful loss of outlook or sense of overbearing would result.

The proposed roof terraces at first and second floor level would be located over 35m from the main rear windows of these properties and this distance is sufficient to ensure no harmful overlooking would occur.

#### No.22 Glenville Gardens

The building would sit on slightly higher ground than no. 22 Glenville Gardens. The closest part of the building to this property is the south western return, the rear flank wall of which sits 14m from the boundary of this property and 25m from the ground floor rear windows.

With regard to daylight, the proposal would not infringe an angle of 25 degrees when measured from the nearest ground floor rear window 1m above ground level, and there would meet the Residential Extension SPD guidelines in this respect.

With regard to outlook, Officers note that the outlook from this property would change as a result of this development as the aspect from no.22 Glenville Garden is currently open. The proposal would see built from run across much of the extent of this property's rear boundary. However, as the main flank wall would be 14m from the shared boundary and 25m from the ground floor rear windows, this is considered sufficient to ensure that the development would not appear overbearing or harmfully increase the sense of enclosure from the property.

There may be some overshadowing of this property from the proposal as the sun rises in the east (more likely in the winter months), but it is not likely to cause significant harm.

The main south western return steps down to single storey towards the rear boundary of the site, specifically designed like this to ensure no harmful daylight or overlooking impacts to no.22. It is considered that the relationship of this single storey element to no. 33 is acceptable with regard to light and outlook.

The only window in the flank wall of the south western return is a dining room window. This would be more than 21m from the rear windows of No.22 Glenville Gardens and therefore accords with the Council's guideline separation distances. Therefore no harmful overlooking would result. The proposed roof terraces would be located over 35m from the rear windows of this property and therefore no harmful overlooking would occur.

#### No.23 Glenville Gardens

No part of the proposed building runs across the rear boundary of this property. Therefore, the direct rearward outlook from this property would not change, albeit it would be possible to achieve angle views of the building from it. The relationship of the building to this dwelling is acceptable. Furthermore, the development would not infringe an angle of 45 degrees within 12m of the rear windows of this dwelling and is therefore acceptable with regard to daylight.

There may be some overshadowing of this property from the proposal as the sun rises in the east (more likely in the winter months) but it is not likely to cause significant harm.

There would be no habitable room windows facing towards this property and the angle and distances of the terraces to this property mean that no harmful overlooking would result.

#### Tower Road properties

There are three dwellings that back on to the site in Tower Road. These properties would face towards the two and a half storey south western return of the building. The new building would sit on slightly higher ground than these dwellings. Due to the angle of these properties to the proposed building the distance from the rear boundaries of these dwellings to the building ranges from between 14 and 20m. The shortest distance to rear windows in these dwellings is 27m. These distances are sufficient to ensure that no loss of light, outlook or privacy would result.

#### Royal Huts Avenue and Portsmouth Road Properties

The distance between Royal Huts Avenue dwellings and flats and the proposed building is such that no loss of light, outlook or privacy would occur. The same is true for the properties along Portsmouth Road.

Whilst the outlook from properties backing onto the site would change noticeably, for the reasons outlined above, there would not be a harmful impact on neighbouring residential amenity by way of loss of light, outlook or privacy, in accordance with

Policy TD1 of the Local Plan Part 1 2018, retained Policies D1 and D4 of the Local Plan 2002 and the Residential Extensions SPD.

## 20. Quality of accommodation

Policy TD1 of the Local Plan Part 1 focuses on the design of development. Amongst other things, it seeks to ensure that developments maximise opportunities to improve the quality of life and health and well-being of current and future residents.

The proposed care home offers well-proportioned bed spaces (all with ensuite wetrooms) that would have a good level of light and outlook. The care home includes a number of communal spaces including a number of lounges, dining rooms, an activity room and a cinema. The indicative landscaping plans show well thought out amenity space provision that includes seating areas at the front of the site and at the rear amongst attractive landscaping.

The proposed development is therefore considered to accord with Policy TD1 of the Local Plan Part 1 which respect to the quality of accommodation provided.

## 21. Flood Risk and Foul Drainage

Policy CC4 of the Local Plan (Part 1) 2018 states that in order to reduce the overall and local risk of flooding, development must be located, designed and laid out to ensure that it is safe; that the risk from flooding is minimised whilst not increasing flood risk elsewhere and that residual risks are safely managed. In those locations identified as being at risk of flooding, planning permission will only be granted where it can be demonstrated that it is located in the lowest appropriate flood risk location, it would not constrain the natural function of the flood plain and where sequential and exception tests have been undertaken and passed. Sustainable drainage systems (SuDS) will be required on major development proposals.

Policy H8 of the Haslemere Neighbourhood Plan states that “appropriate to their scale, nature and location, development proposals should incorporate appropriate water and sewage capacity facilities.

A Flood Risk Assessment prepared by Tetra Tech accompanies the application and confirms that the site is in Flood Zone 1 for coastal and fluvial flooding. The site is also shown to be at very low risk from surface water flooding. The report advises that there is a low risk of sewer flooding, based on the advice of Thames Water.

The development is considered to be in an appropriate location with regard to flooding as it is in the lowest flood risk zone (Zone 1). In this respect, the development accords with Policy CC4 of the Local Plan Part 1.

The Flood Risk Assessment also outlines a SuDS strategy which comprises a gravity network draining the building and impermeable external areas. This will discharge to the ground via soakaways and infiltration. The soakaways are proposed to be located in the car park and the landscaped areas. The report concludes that the development of the site will reduce flood risk within the site and to areas adjacent to the site by providing a drainage system that will control surface water discharge.

As the proposal shows that surface water will not be discharged to the public network, Thames Water has raised no objection in this respect. The Lead Local Flood Authority has also reviewed the proposals and has raised no objections to the proposal, subject to conditions. Officers are therefore satisfied that the proposed development is acceptable in this regard.

The Flood Risk Assessment also deals with the aspect of foul water drainage. This confirms that the existing foul drainage system that serves the building is private and is maintained by the occupier. The outfall for the private foul drainage system is the Thames Water foul sewer that runs through the northern zone of the site. The report advises that Thames Water has confirmed that there is adequate capacity to cater for the foul discharge from the care home.

Residents have raised concerns regarding the capacity of the foul sewer network and cite existing problems. Thames Water have raised no objection in relation to foul water sewerage network infrastructure capacity. They have advised that any sewer flooding in the area is attributed to blockages rather than lack of capacity in the network. This element of the proposal is considered acceptable.

Overall, the development accords with the requirements of Policy CC4 of the Local Plan Part 1 2018 and Policy H8 of the Haslemere Neighbourhood Plan 2013-2032.

## 22. Trees and landscaping

Policy NE2 of the Local Plan (Part 1) 2018 states that the Council will seek, where appropriate, to maintain and enhance existing trees, woodland and hedgerows within the Borough. Retained Policies D6 and D7 of the Local Plan 2002 are attributed full and significant weight respectively due to their level of consistency with the NPPF 2018.

Policy H9 of the Haslemere Neighbourhood Plan relates to trees, woodland and hedgerows and reflects the spirit of the policies mentioned above.

There are a group of TPO'd oak trees along the site frontage and two TPO'd trees on the south western boundary of the site. These trees would be retained within the scheme. An Arboricultural Impact Assessment has been submitted with the application which confirms that as a result of the footprint of the new building sits outside of the calculate Root Protection Areas of the trees.

It is acknowledged in the report that a small part of the outer RPA of three trees along the frontage will be compromised by a portion of path running along the edge of the building. The report advises that this are to be excavated to enable the provision of the path will hand dug and nay roots encountered will be suitably pruned and covered.

The Council's Tree Officer has reviewed the details provided and raises no objection with regard to the impact on trees, subject to conditions in relation to tree protection measures and landscaping.

The applicant has submitted a landscaping scheme which demonstrates how the site would be landscaped to provide an enhance setting for the building. The landscaping envisaged is considered appropriate.

The proposed development is therefore considered to accord with Policy NE2 of the Local Plan Part 1 , Policy H9 of the Haslemere Neighbourhood Plan 2013-2032 and Retained Policies D6 and D7 of the Local Plan 2002.

### 23. Ecology

Policy NE1 of the Local Plan 2018 (Part 1) states that the Council will seek to conserve and enhance biodiversity. Development will be permitted provided it retains, protects and enhances biodiversity and ensures any negative impacts are avoided or, if unavoidable, mitigated.

Further, Circular 06/2005 states 'It is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before planning permission is granted.'

Policy H12 of the Haslemere Neighbourhood Plan seeks to protect and enhance biodiversity through Haslemere's Ecological Network. The policy states that development that negatively affects the network of fragments the network will not be supported unless appropriate mitigation is incorporated into the proposal. The policy also states, amongst other things, that there should be a net gain for biodiversity.

The site does not form part of Haslemere's Ecological Network as shown in Figures 8a, 8b, and 9 of the Haslemere Neighbourhood Plan.

An Ecological Impact Assessment prepared by Simlaw has been submitted with the application. An Extended Phase 1 Habitat Survey was carried out on 2<sup>nd</sup> March 2021 with a previous survey taking place in September 2017. Dusk Bat Emergence Surveys were undertaken in May and June 2021. The report advises that active bird nests were previously recorded within two buildings on the site. Demolition of the

buildings will also result in the permanent loss of the existing nesting habitats within the site and these are unlikely to be replaced by naturally occurring bird nesting habitats in the newly constructed buildings. The proposed development will therefore result in a net loss of bird nesting habitats within the site.

With regard to bats, three day roosts with one common pipistrelle each have been identified within two buildings on the application site. Another building supports a day roost used by one common pipistrelle. Demolition of the building will result in the loss of these roosts.

The hedgerows within the site have high potential to support nesting birds. In the absence of mitigation, the removal of these habitats during the bird nesting season has the potential to result in the destruction of active bird nests.

Whilst highlighting the potential harms, the report also recognises that there would be increased site biodiversity as shown in the illustrative landscaping scheme. Within this scheme there is provision for soft landscaping, planting, hedges and additional trees that are native to the UK. The proposal also incorporates native, species-rich hedgerow planting and wildflower meadow planting. The development would therefore result in a net gain of biodiversity within the site.

The increase in native planting will provide valuable food sources for bats, birds, invertebrates and other common and widespread species. The proposed development will therefore result in an increase in foraging habitat available within the site for a number of legally protected and priority species, in addition to other common and widespread species.

It is proposed to incorporate bat boxes within the fabric of the new building or on existing mature trees within the application site which will result in an increase in roosting habitat for the local bat population.

Finally, it is suggested that there will be increased bird nesting opportunities through the incorporation of bird boxes suitable to support swift and house sparrow within the fabric of the new building. This will result in an increase of available nesting habitat for these priority species. Additional bird boxes suitable to support species such as blue tit, dunnock, robin and wren, will be included on the existing mature trees.

A Biodiversity Net Gain Assessment has been undertaken for the site which confirms that with all these measures in place, there will be a net gain in biodiversity on the site as a result of the development.

Surrey Wildlife Trust has reviewed the proposals and advised that it does not raise any objection to the proposal, subject to conditions including that the development is implemented in accordance with a Landscape and Ecological Management Plan and a Construction Ecological Management Plan to be submitted to and approved in writing by the Council.

On the basis of the details outlined above the proposal is not considered to result in harm to Haslemere's Ecological Network and, in fact, will improve biodiversity at the site.

The proposed development is therefore considered acceptable in relation to biodiversity and is in accordance with Policy NE1 of the Local Plan Part 1 2018 and Policy H12 of the Haslemere Neighbourhood Plan 2013-2032.

#### 24. Archaeology

The site is not within an Area of High Archaeological Potential. However, due to the size of the site and pursuant to Policy HE15 of the Local Plan, it is necessary for the application to take account of the potential impact on archaeological interests.

Retained Policies HE14 and HE15 of the Local Plan 2002 require that appropriate desk based or field surveys should be submitted with an application and appropriate measures taken to ensure any important remains are preserved. These policies are afforded full weight owing to their consistency with the NPPF.

The need to safeguard and manage Waverley's rich and diverse heritage, including all archaeological sites, is set out in Policy HA1 of the Local Plan Part 1 2018.

The application is accompanied by an Archaeological Desk-based Assessment prepared by Thames Valley Archaeological Services. This report advises that there are no known heritage assets on the proposal site or in a position to be affected by the development. It confirms that the northern section of the site was developed in the 1970's and it seems unlikely that archaeological deposits will have survived in good condition, if at all, in this zone. The southern section of the site was used as a car park and groundworks there will have been less invasive. Therefore, archaeological survival in this section of the site is more plausible.

Surrey County Council's Archaeological Officer agrees with the conclusion that further archaeological investigation is required in the southern part of the site to clarify the identified potential. In the first instance, this should comprise an archaeological evaluation trial trenching exercise, which will aim to rapidly establish whether archaeological assets are present. The results of the evaluation will enable suitable mitigation measures to be developed. The Archaeological Officer raises no objection to the application subject to a condition requiring the implementation of a programme of archaeological work to be undertaken in accordance with a Written Scheme of Investigation to be approved by the Local Planning Authority, prior to commencement of development.

The proposed development is therefore considered to accord with Retained Policies HE14 and HE15 of the Local Plan 2002 and Policy HA1 of the Local Plan Part 1 2018.

## 25. Contaminated land

Retained Policy D1 of the Local Plan 2002 seeks to ensure that development does not result in the potential pollution of air, land or water.

Paragraph 180 of the NPPF states that planning decisions should ensure that new development is appropriate for its location by taking into account the effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner in accordance with paragraph 179 of the NPPF.

The application is accompanied by a Report on Ground Investigation and a Remediation Strategy and Verification Plan for the site both dated July 2021 and prepared by Applied Geology.

These reports identify a number of remedial measures that would need to take place at the site to enable its redevelopment. These include the removal of an underground petrol storage tank and associated redundant pipework, soil sampling beneath the existing buildings and consequent remedial action as appropriate, the importing of 300mm of topsoil across all areas of soft landscaping.

The Council's Contaminated Land Officer has reviewed the proposals and agrees with most of the contents of the report. However, there is one area of concern in relation to low concentrations of asbestos fibres in soils. The report states that these are "not hazardous/background concentrations". The Contaminated Land Officer does not agree with this assertion, however, this will be dealt with when addressing other issues by remediating the soils in the landscaped areas. The Officer further advises that the Nissen huts on site (potentially ex world ward 2 buildings) indicate a watching brief for further asbestos containing materials in soil on site is essential.

The Officer raises no objection to the proposal subject to the conditions to secure the provision of a verification report once all the remedial works have been undertaken and steps to be put in place should unexpected contamination be found on the site during the course of the construction works.

Subject to these conditions, the proposed development is not considered harmful with regard to contamination and is in accordance with Retained Policy D1 of the Local Plan 2002.

## 26. Energy and sustainability statement



Policy CC1 of the Local Plan Part 1 relates to climate change and states that development will be supported where it contributes to mitigating and adapting to the impacts of climate change, including measure that use renewable and low carbon energy supply systems, provide appropriate flood storage capacity, address issues of flood risk, provide high standards of sustainable design and construction with built-in resilience to climate change; or use green infrastructure and SuDS to help absorb heat, reduce surface water run-off and support habitat networks.

Policy CC2 seeks to promote sustainable patterns of development and reduce the level of greenhouse gas emissions. It sets out a number of strategies to achieve this which include measures to minimise energy and water use through the development's design, layout, landscape and orientation; ensuring that the development is designed to encourage walking, cycling, and access to sustainable forms of transport; incorporating measures that protect and, where possible, enhance the biodiversity value of the site.

The report advises that the building, its construction components and internal systems will be designed to achieve compliance with Building Regulations Approved Document Part L2A 2013. This section of the Building Regulations covers the conservation of fuel and power in buildings. Energy efficient measures that are considered suitable by the developer include ensuring an efficient thermal performance of the building envelope and the use of low emissivity solar control glass to reduce heat loss in winter, the provision of external shading to reduce direct solar gain, the maximisation of the potential for natural ventilation, and the use of high efficiency heating and cooling systems. In addition to this, a small-scale combined heat and power plant is proposed to achieve carbon reduction and on-site energy generation. Any permission would include a condition to require 4 electric vehicle charging points and a limit on water consumption set at no more than 110 litres of water per person per day. A SuDS system also forms part of the proposal and a Travel Plan would be required to be provided in encourage use of transport modes other than the car.

The incorporation of these energy and sustainability measures means that the proposal complies with Policies CC1 and CC2 of the Local Plan Part 1.

## 27. Impact on Infrastructure

Policy ICS1 of the Local Plan Part 1 2018 states that infrastructure considered necessary to support new development must be provided either on or off site either as a requirement of planning conditions or by the payment of financial contributions through planning contributions, and/or the Community Infrastructure Levy.

A number of representations have been submitted raising objection to the proposal on the grounds that there is not sufficient capacity within the local health care system to cater for the additional burden that this development will place on it.

Officers recognise that there are significant pressures on the NHS and that this development (as with any development that provides residential accommodation) would add to those pressures. However, the route for raising funds to improve the physical infrastructure of the various health care providers such as the doctor's surgery and the Royal Surrey is via the CIL bidding process. The CIL charging schedule has been set up specifically to collect money that is then used to fund the physical infrastructure in the Borough which is needed to support new development. Although the development is not CIL liable, it is not possible to factor this into the considerations in determining whether S106 monies are required.

The local health care staffing issues that are set out in the consultation responses are noted by Officers. However, S106 contributions cannot be used to fund the provision of new staff, rather they are used to ensure that site specific impacts from a development are mitigated for by providing contributions towards infrastructure. Furthermore, a shortage of healthcare professionals in the area is an issue that sits outside of the remit of planning.

On this basis, the proposed development accords with Policy ICS1 of the Local Plan Part 1.

## 28. Tilted Balance

The Council does not have a 5 year housing land supply (between 4.47 and 5 years' worth). On this basis, paragraph 11(d) of the NPPF is engaged and the presumption in favour of sustainable development applies. Planning permission should be granted "unless the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweighs the benefits".

Taking these two points in turn, whilst the Wealden Heath II SPA is a protected area for the purpose of this paragraph, the nature of the use and occupiers of the building means that this protected area would not be harmed. With regard to the second point, there may be some impact health care facilities resulting from the development. However, the appropriate mechanism for addressing these impacts is via the CIL process. No other harm has been identified as a result of the proposal and in fact, the proposal achieves a number of benefits including the redevelopment of a brownfield site to provide care home accommodation for which there is a recognised need in the Borough, and a well-designed scheme that would make a positive contribution to the street scene. The proposal would also contribute the equivalent of 41 dwellings to the Council's housing supply. The proposed development is acceptable in all respects and would accord with the Development Plan. There is therefore nothing to preclude this development from being approved, even if the presumption in favour of sustainable development did not apply.

## 29. Conclusion

The proposal development makes much more efficient use of an under-used piece of land within the settlement boundary. It provides care home accommodation for which there is a recognised need in the Borough and would contribute the equivalent of 41 bedrooms to the Council's housing land supply. The development would improve the street scene by providing a well-designed building and a high quality landscaping scheme. The loss of the existing uses on the site is acceptable. Whilst the outlook from properties backing onto the site would change noticeably, there would not be a harmful impact on neighbouring residential amenity by way of loss of light, outlook or privacy. The County Highway Authority is satisfied that the development is acceptable from a highways safety and convenience perspective and that sufficient car parking is provided. Due to the nature of the occupiers of the care home (secured via condition) the proposed development would not have a harmful impact on the Wealden Heaths I or II SPA. It is acknowledged that the development may have some impact on local health care in the area. However, the appropriate mechanism for addressing these impacts is via the CIL process. It is noted that a number of the problems facing local health care providers, such as the lack of qualified staff in the locality, are wider issues that fall outside of the scope of planning.

Overall, the proposed development is considered to accord with the Development Plan and would provide a number of benefits. Approval is therefore recommended.

### **Recommendation**

That permission be GRANTED subject to the following conditions:

#### Condition 1

The plan numbers to which this permission relates are PL500, PL501, PL502, PL503, PL507, PL508 and PL510. The development shall be carried out in accordance with the approved plans. No material variation from these plans shall take place unless otherwise first agreed in writing with the Local Planning Authority.

#### Reason

In order that the development hereby permitted shall be fully implemented in complete accordance with the approved plans and to accord with Policy TD1 of the Local Plan 2018 (Part 1), Policy H6 of the Haslemere Neighbourhood Plan 2013-2032 and retained Policies D1 and D4 of the Local Plan 2002.

#### Condition 2

No above ground development shall take place until samples of the materials to be used in the construction of the external surfaces (including paving and pathways) of the development hereby permitted have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

#### Reason

In order to ensure a satisfactory external appearance and prevent harm to the street scene, in accordance with Policy TD1 of the Local Plan Part 1 2018, Policy H6 of the Haslemere Neighbourhood Plan 2013-2032 and Retained Policies D1 and D4 of the Local Plan 2002.

#### Condition 3

Prior to commencement of any works on site, demolition or other development activities, a protective fence to BS 5387, and located in accordance with the submitted Arboricultural Report shall be erected, so as to exclude storage of materials, level increases, excavation or other building activities likely to be harmful to roots. Such fencing shall remain in place throughout the duration of the development to the satisfaction of the Local Planning Authority. The Local Planning Authority Tree Officer shall be informed of the proposed date of commencement, at least one working week in advance, to allow inspection of protection measures via site visit or submitted photographs. Monitoring visits are to be carried out by the Applicants arboriculturalist in accordance with the inspection stages set out in the Arboricultural Report with copies of photographs sent to the Local Authority Tree Officer.

#### Reason:

In order to ensure the long term health of the trees and to protect the character and amenities of the area, in accordance with Policy NE2 of the Local Plan Part 1 2018, Policy H9 of the Haslemere Neighbourhood Plan 2013-2032 and Retained Policies D6 and D6 of the Local Plan 2002. This is a pre-commencement condition in order to ensure the protection of on-site trees during construction.

#### Condition 4

The development hereby approved shall only be used as a care home in Class C2 Use and shall be occupied solely by persons who are mentally and/or physically frail; have mobility problems; suffer from paralysis or partial paralysis; or are in the need of assistance with the normal activities of life. The building shall not be used for any other purpose within Class C2 Use of the Town and Country Planning (Use Classes) Order 1987 (as amended) or any other statutory instrument and notwithstanding any provisions either in force or enacted at a later date, there shall be no permitted change of use. In addition, there shall be no self-contained or staff accommodation within the approved development and there shall be no dogs or cats at the premises at any time (other than assisted living dogs).

#### Reason

In order to ensure that the development does not have a harmful impact on the Wealden Heaths II SPA, in accordance with Policy NE1 of the Local Plan Part 1 2018.

#### Condition 5

Prior to first occupation of the site, the submitted Parking Management Plan dated January 2022 and prepared by Development Transport Planning shall be fully implemented, and thereafter the Parking Management Plan shall be reviewed annually to the satisfaction of the Local Planning Authority.

#### Reason

In order to ensure no harmful impact on highway safety or inconvenience to highway users, and to ensure no harmful impact on the Wealden Heath II SPA, in accordance with Policies ST1 and NE1 of the Local Plan Part 1 2018 and Policy H7 of the Haslemere Neighbourhood Plan 2013-2032.

#### Condition 6

Other than the provision of the new vehicular access, no development shall commence, unless and until the proposed vehicular access to Portsmouth Road has been constructed and provided with a means within the private land of preventing private water from entering the highway and visibility zones in accordance with the approved plans and thereafter the visibility zones shall be kept permanently clear of any obstruction over 0.60m high.

#### Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with Policy ST1 of the Local Plan Part 1 2018 and Policy H7 of the Haslemere Neighbourhood Plan 2013-2032. This is a pre-commencement condition to ensure highway safety during the course of the development.

#### Condition 7

The development hereby approved shall not be commenced unless and until the existing access from the site to Portsmouth Road has been permanently closed and any kerbs, verge, footway, fully reinstated.

#### Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with Policy ST1 of the Local Plan Part 1 2018 and Policy H7 of the Haslemere Neighbourhood Plan 2013-2032. This is a pre-commencement condition to ensure highway safety during the course of the development.

#### Condition 8

The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles and cycles to be parked, for the loading and unloading of number vehicles and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking, loading and unloading and turning areas shall be retained and maintained for their designated purposes.

#### Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users, in accordance with Policy ST1 of the Local Plan Part 1 2018 and Policy H7 of the Haslemere Neighbourhood Plan 2013-2032.

#### Condition 9

No development shall commence until a Construction Transport and Environment Management Plan, to include details of:

- (a) parking for vehicles of site personnel, operatives and visitors
- (b) loading and unloading of plant and materials
- (c) storage of plant and materials
- (d) programme of works (including measures for traffic management)
- (e) provision of boundary hoarding behind any visibility zones
- (f) HGV deliveries and hours of operation
- (g) measures to prevent the deposit of materials on the highway (including wheel washing facilities)
- (h) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
- (i) on-site turning for construction vehicles
- (j) Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method of piling for foundations, the careful selection of plant and machinery and use of noise mitigation barrier(s)
- (k) arrangement for public consultation and liaison during construction works
- (l) Details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination
- (m) measures to control the emission of dust and dirt during construction
- (n) a scheme for recycling/disposing of waste resulting from demolition and construction works

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

#### Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and would not result in harm to neighbouring residential amenity, in accordance with Policies TD1 and ST1 of the Local Plan Part 1 2018, Policy H7 of the Haslemere Neighbourhood Plan 2013-2032 and Retained Policies D1 and D4 of the Local Plan 2002. This is a pre-commencement condition to ensure highway safety during the course of the development.

#### Condition 10

Prior to first occupation at the development site, a Travel Plan shall be submitted for the written approval of the Local Planning Authority in accordance with the sustainable development aims and objectives of the National Planning Policy

Framework, Surrey County Council's "Travel Plans Good Practice Guide", and in general accordance with the 'Heads of Travel Plan' document and the Applicant's submitted Framework Travel Plan dated August 2021. And then the approved Travel Plan shall be implemented prior to opening of trading and thereafter shall be maintained and developed to the satisfaction of the Local Planning Authority

#### Reason

In order to encourage the use of sustainable transport options in accordance with Policy ST1 of the Local Plan Part 1 2018 and Policy H7 of the Haslemere Neighbourhood Plan 2013-2032.

#### Condition 11

Prior to occupation of the development, full details of a hard and soft landscaping scheme shall be submitted to and approved in writing. The landscaping scheme shall be carried out in strict accordance with the agreed details and shall be carried out within a timescale to be agreed by the Local Planning Authority. All new tree planting shall be positioned in accordance with guidelines and advice contained in the current British Standard 5837. Trees in relation to construction. The landscaping scheme shall be maintained to the satisfaction of the Local Planning Authority for a period of 5 years Such maintenance to include that any trees shrubs or plants planted in accordance with this condition which are removed, die or become damaged or become diseased within five years of planting shall be replaced within the next planting season by trees, and shrubs of the same size and species.

#### Reason

In the interest of the character and amenity of the area in accordance with Policy TD1 of the Local Plan 2018 (Part 1) and retained Policies D1 and D4 of the Local Plan 2002.

#### Condition 12

Prior to any works commencing on site that may affect bats, a mitigation licence shall be obtained from Natural England and the works shall in undertaken in accordance with this licence.

#### Reason

In order to ensure no harm to protected species in accordance with Policy NE1 of the Local Plan Part 1 2018 and Policy H12 of the Haslemere Neighbourhood Plan 2013-2032. This is a pre-commencement condition to ensure no harm to protected species during construction works.

#### Condition 13

The Development shall be carried out in complete accordance with the mitigation and enhancement measures set out in Sections 6 and 7 of the Ecological Impact Assessment prepared by Simlaw including the Biodiversity Net Gain Assessment dated 17<sup>th</sup> January 2022.

#### Reason

In order to ensure no harm to protected species in accordance with Policy NE1 of the Local Plan Part 1 2018 and Policy H12 of the Haslemere Neighbourhood Plan 2013-2032.

#### Condition 14

Prior to commencement of development, a Landscape and Environmental Management Plan providing management measures required to deliver the biodiversity net gain identified in the biodiversity net gain assessment, to include the following details (but not limited to):

- a) Description and evaluation of features to be managed
- b) Ecological trends and constraints on site that might influence management
- c) Aims and objectives of management
- d) Appropriate management options for achieving aims and objectives
- e) Prescriptions for management actions together with a plan of management compartments
- f) Preparation of work schedule (including annual work plan capable of being rolled forward over five year period)
- g) Details of body or organisation responsible for implementation of plan
- h) Ongoing monitoring or remedial measures
- i) Legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery
- j) Monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in complete accordance with the approved Landscape and Environmental Management Plan.

#### Reason

In order to ensure ecological enhancements on the site, in accordance with Policy NE1 of the Local Plan Part 1 2018 and Policy H12 of the Haslemere Neighbourhood Plan 2013-2032. This is a pre-commencement condition to ensure no harm to ecology during construction and beyond.

#### Condition 15

Upon completion of the approved remediation works as detailed in the submitted report Applied Geology Ltd, Report number AG3239-21-AM09, January 2022, a verification report demonstrating the effectiveness of the approved remediation works carried out shall be completed and shall be submitted to the Local Planning authority for approval prior to occupation of the development.



#### Reason

In order to ensure that no pollution arises from the development, in accordance with Retained Policy D1 of the Local Plan 2002.

#### Condition 16

Following commencement of the development hereby approved, if unexpected contamination is found on site at any time, other than that identified in accordance with Condition 16, the Local Planning Authority shall be immediately notified in writing and all works shall be halted on the site. The following shall be submitted and approved in writing by the Local Planning Authority prior to the recommencement of works:

- a) An investigation and risk assessment, according to UK best practice.
- b) Where required, a remediation scheme.
- c) Following completion of approved remediation works, a verification report, in accordance with the requirements as set out in Condition 16.

#### Reason

In order to ensure that no pollution arises from the development, in accordance with Retained Policy D1 of the Local Plan 2002.

#### Condition 17

The development hereby approved shall not be first occupied unless and until the allocated parking spaces are provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply) and a duct to be installed to facilitate the future implementation of additional charging points in accordance with the approved plans (Drawing No. ME-600 Rev\_P1) and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

#### Reason

To ensure sustainable construction and design in accordance with Policy CC2 of the Waverley Local Plan Part 1 (2018).

#### Condition 18

No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

#### Reason

The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local

underground sewerage utility infrastructure, contrary to Policy ICS1 of the Local Plan Part 1 2018.

#### Condition 19

No machinery or plant shall be operated, no demolition or construction processes carried out and no deliveries taken at or dispatched from the site except between the hours 08:00 – 18:00 Monday to Friday, 08:00 – 13:00 Saturday and not at any time on Sundays, Bank or Public Holidays.

#### Reason

In order to protect neighbouring residential amenity, in accordance Policy TD1 of the Local Plan Part 1 2018 and Retained Policies D1 and D4 of the Local Plan 2002.

#### Condition 20

There shall be no burning of any waste or other materials on the site during the demolition and construction phases of the development.

#### Reason:

In order to protect neighbouring residential amenity, in accordance Policy TD1 of the Local Plan Part 1 2018 and Retained Policies D1 and D4 of the Local Plan 2002.

#### Condition 21

The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national NonStatutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

a) The results of further infiltration testing completed in accordance with BRE Digest: 365 at locations of the proposed soakaways and confirmation of groundwater levels.

b) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep, Network Asset Management Highways Laboratory and Information Centre Merrow Lane Guildford Surrey GU4 7BQ 2 during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy.

c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.

d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.

e) Details of drainage management responsibilities and maintenance regimes for the drainage system.

f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

#### Reason

To reduce the risk of flooding to the proposed development and future occupants, in accordance with Policies CC1 and CC4 of the Local Plan Part 1 2018. This is a pre-commencement condition as it goes to the heart of the permission.

#### Condition 22

Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

#### Reason

To reduce the risk of flooding to the proposed development and future occupants, in accordance with Policies CC1 and CC4 of the Local Plan Part 1 2018.

#### Condition 23

No external lighting shall be installed until a detailed scheme of lighting including a Sensitive Lighting Management Plan has been submitted to, and approved in writing by, the local planning authority prior. This scheme shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) and an ISO lux plan showing light spill with consideration given to the impact of lighting on bats. The scheme of lighting shall be installed, maintained and operated in accordance with the approved scheme and less that local planning authority gives its written consent to any variation.

#### Reason

In order to protect the visual amenity of the area and ensure no harmful light pollution or harmful impact on ecology, in accordance with Policy TD1 and NE1 of the Local Plan Part 1 2018, Policy H12 of the Haslemere Neighbourhood Plan 2013-2032 and Retained Policies D1 and D4 of the Local Plan 2002.

#### Condition 24

The cycle, refuse store and any gazebos proposed shall not be constructed until detailed elevations have been submitted to and approved in writing by the Local

Planning Authority. The development shall be carried out in accordance with the approved drawings.

#### Reason

In order to ensure a satisfactory external appearance, in accordance with Policy TD1 of the Local Plan Part 1 2018, Policy H6 of the Haslemere Neighbourhood Plan 2013-2032 and Retained Policies D1 and D4 of the Local Plan 2002.

#### Condition 25

Prior to the occupation of the development, a detailed refuse strategy including the number, type and size of bins to be provided, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in complete accordance with the agreed details.

#### Reason

In order to ensure adequate refuse provision, in accordance with Policy TD1 of the Local Plan Part 1 2018.

#### Condition 26

The windows at first and second floor levels that serves circulation space and are located in the rear elevations of the north eastern wings of the building shall be fixed shut in perpetuity and have obscure glazing to the extent that intervisibility is excluded.

#### Reason

In order to safeguard the privacy of neighbouring occupiers, in accordance with Policy TD1 of the Local Plan 2018 (Part 1) and Retained Policies D1 and D4 of the Local Plan 2002.

#### Condition 27

Before any on-site work begins, cross sections/details indicating the proposed finished floor levels of the proposed building and finished ground levels surrounding the buildings shall be approved in writing by the Local Planning Authority. The works shall be undertaken in strict accordance with the approved details.

#### Reason

In the interests of the character and amenity of the area, in accordance with Policy TD1 of the Local Plan Part 1 (2018), Policy H6 of the Haslemere Neighbourhood Plan 2013-2032 and Retained Policies D1 and D4 of the Local Plan 2002. This is a pre-commencement condition as it goes to the heart of the planning permission.

#### Condition 28

Prior to the commencement of development, a Construction Ecological Management Plan to include the following details (but not limited to):

- a) Map showing the location of all the ecological features
- b) Risk assessment of the potentially damaging construction activities
- c) Practical measures to avoid and reduce impacts during construction
- d) Location and timing of works to avoid harm to biodiversity features
- e) Responsible persons and lines of communication

- f) Use of protected fences, exclusion barriers and warning signs
- g) Nesting bird mitigation and management plan
- h) Invasive (plant) species management plan

shall be submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development. This is a pre-commencement condition in order to ensure no harm to ecology during the course of construction.

#### Reason

In order to ensure no harm to ecology, in accordance with Policy NE1 of the Local Plan Part 1 2018 and Policy H12 of the Haslemere Neighbourhood Plan 2013-2032.

#### Condition 29

In the event that vegetation removal and building demolition is required to take place between March and August then a report providing evidence of any additional bird nesting surveys and associated supervision required as a result, shall be submitted to and approved by the Local Planning Authority.

#### Reason

In order to ensure no harm to ecology, in accordance with Policy NE1 of the Local Plan Part 1 2018 and Policy H12 of the Haslemere Neighbourhood Plan 2013-2032.

#### Informatives:

- 1) The Council confirms that in assessing this planning application it has worked with the applicant in a positive and proactive way, in line with the requirements of Paragraph 38 of the National Planning Policy Framework 2019.
- 2) The permission hereby granted shall not be construed as authority to carry out any works on the highway. The applicant is advised that prior approval must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, or verge to form a vehicle crossover or to install dropped kerbs. Please see <https://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/vehicle-crossovers-or-dropped-kerbs>.
- 3) In the event that the access works require the felling of a highway tree not being subject to a Tree Preservation Order, and its removal has been permitted through planning permission, or as permitted development, the developer will pay to the Council as part of its licence application fee compensation for its loss based upon 20% of the tree's CAVAT valuation to compensate for the loss of highway amenity.

- 4) The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <https://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/traffic-management/permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see [www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice](http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice).
- 5) When a temporary access is approved or an access is to be closed as a condition of planning permission an agreement with, or licence issued by, the Highway Authority Local Highways Service will require that the redundant dropped kerb be raised and any verge or footway crossing be reinstated to conform with the existing adjoining surfaces at the developers expense.
- 6) The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
- 7) When access is required to be 'completed' before any other operations, the Highway Authority may agree that surface course material and in some cases edge restraint may be deferred until construction of the development is complete, provided all reasonable care is taken to protect public safety.
- 8) Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.
- 9) It is the 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.
- 10) The developer is advised that a standard fee will be charged for input to, and future monitoring of, any Travel Plan.

- 11) Management of surface water from new developments should follow guidance under sections 167 & 168 in the National Planning Policy Framework. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to Thames Water's website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>.
- 12) A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures that will undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.
- 13) There are public sewers crossing or close to the development. If significant work near the sewers is planned, it's important that the risk of damage is minimised. Thames Water will need to check that the development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read Thames Water's guide for working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes>.
- 14) The applicant is encouraged to apply for a Secure by Design Accreditation
  - 1) The Council confirms that in assessing this planning application it has worked with the applicant in a positive and proactive way, in line with the requirements of Paragraph 38 of the National Planning Policy Framework 2019.
  - 2) The permission hereby granted shall not be construed as authority to carry out any works on the highway. The applicant is advised that prior approval must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, or verge to form a vehicle crossover or to install dropped kerbs. Please see <https://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/vehicle-crossovers-or-dropped-kerbs>.
  - 3) In the event that the access works require the felling of a highway tree not being subject to a Tree Preservation Order, and its removal has been permitted through planning permission, or as permitted development, the developer will pay to the Council as part of its licence application fee compensation for its loss

based upon 20% of the tree's CAVAT valuation to compensate for the loss of highway amenity.

4. 4) The permission hereby granted shall not be construed as authority to carry out any works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <https://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/traffic-managementpermit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see [www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice](http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice).
5. 5) When a temporary access is approved or an access is to be closed as a condition of planning permission an agreement with, or licence issued by, the Highway Authority Local Highways Service will require that the redundant dropped kerb be raised and any verge or footway crossing be reinstated to conform with the existing adjoining surfaces at the developer's expense.
6. 6) The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
7. 7) When access is required to be 'completed' before any other operations, the Highway Authority may agree that surface course material and in some cases edge restraint may be deferred until construction of the development is complete, provided all reasonable care is taken to protect public safety.
8. 8) Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.
9. 9) It is the 59 of the Highways Act permits the Highway Authority to charge



developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.

10. 10) The developer is advised that a standard fee will be charged for input to, and future monitoring of, any Travel Plan.
11. 11) Management of surface water from new developments should follow guidance under sections 167 & 168 in the National Planning Policy Framework. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to Thames Water's website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>.
12. 12) A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures that will undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.
13. 13) There are public sewers crossing or close to the development. If significant work near the sewers is planned, it's important that the risk of damage is minimised. Thames Water will need to check that the development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read Thames Water's guide for working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes>.
14. 14) The applicant is encouraged to apply for a Secure by Design Accreditation

**Response to East Hampshire Local Plan consultation  
January 2024**

**re proposed development of**

**Land at Haslemere Road**

**Liphook, Hampshire**

**GU30 7DB**

**For**



**from**



**Town Planning Consultant**

**Jennifer Lampert Associates Ltd**

**5 Pincombe Ct**

**Buckingham Close**

**Exmouth**

**EX82JB**

**Tel 01395 277707**

**Email [jflplanning@aol.com](mailto:jflplanning@aol.com)**

## **Introduction**

The site is located at Haslemere Road, Liphook, Hampshire, GU30 7DB and is overall approximately 1.22 hectares in size. The site ownership abuts the public highway boundary on both the Devils Lane and Haslemere frontages.

The land is in the freehold ownership of [REDACTED] and was originally part of the larger farmholding that is still owned by the family. It ceased to be practical for arable cereal production over 20 years ago and has had no viable connection with that farming operation since.

It is currently unused farmland with scrub vegetation and semi mature self sown trees mainly hazel around the north and west periphery with a specimen beech and additional oak trees and hedgerow in the north west corner.

The land has a plateau at its western end and then slopes down gently as it narrows to the east.

The southern boundary abuts the London to Portsmouth rail line which runs in a cutting for most of the site. There is a band of mature broadleaved trees at the top of the rail embankment owned by network Rail which offers a strong landscape feature to the south of the site.

The northern boundary of the site is marked by the B2131 Haslemere Road and the mature trees and hedgerow screen. This boundary continues to run westward into the existing settlement boundary for the village of Liphook as it approaches the Devil's Lane junction.

The land is next to existing built-up limits of the settlement with substantial executive housing on both sides of Devil's Lane which is a publicly adopted road and is used by residential traffic and other service and delivery vehicles including the Council's refuse and recycling vehicles.

The railway line is in a cutting and Devil's Lane is raised in a bridge over the line.

Access into this proposed development site would be taken from the B2131.

## **Background**

This current representation is made pursuant to the representations that were made in 2018 to the East Hampshire District Council call for sites, where at that time the suggested numbers of dwellings proposed for the site was a total of 35 dwellings on 1.22 hectares for market housing.

This related to the then adopted East Hampshire District Local Plan Joint Core Strategy 2014-2028 that was adopted June 2014. It had a policy focus to protect the environment and local countryside. One of the aims was to provide sustainable communities and Liphook is identified as a large village with varying range of services and community facilities. The LP identified that the settlement needs to enhance its role as a sustainable community providing commercial and community uses for the wider area.

In addition objective 5 was to make the most efficient use of land the existing housing stock so that everyone has the opportunity to live in a decent, sustainably constructed and affordable home which is capable of being adapted to changing personal needs and objective 6 sought to promote safe and sustainable communities by ensuring an appropriate housing mix, taking into account the needs of identified groups in varying settlements.

Under paragraph 3.19 Developers will be expected to incorporate appropriate landscaping and also enhance links between existing habitats, including the enhancement of wildlife corridors.

As part of the Draft Local Plan 2017-2036 consultation there was a call for sites in March 2019. This site at Haslemere Road Liphook was submitted in response to that call for sites for 35 market houses. A request was by the Council in August 2018 for provision of details for mitigation in the form of a suitable alternative natural greenspace (SANG) because the site was located with the 5 km buffer of the Special Protection Area (SPA).

A reply was made on 25<sup>th</sup> August 2018 that if necessary the SANG provision could be made within the confines of the site with a reduction of housing units to a total of 24. The SANG provision would amount to 0.47 hectare and the reduced housing numbers would provide a mix of 6 x 2 bedroom dwellings, 10 x 3 bedrooled dwellings and 8 x 4 bedrooled dwellings with the SANG provision being at the eastern end of the site.

The site was included as part of the Land Availability Assessment (LAA) 1<sup>st</sup> April 2021 prepared to inform the emerging East Hampshire District Local Plan and email exchanges provided on 4<sup>th</sup> July 2022 when the site was given the reference no LAA/LIP-011 and outlined the site in green and marked it as “an included and developable site.” We confirmed at that time that the site area was 1.53 hectares and an estimated 29 dwellings proposed and that the site was deliverable within a reasonable time frame.

#### **Current response to the revised draft Local Plan for East Hampshire placed on consultation from 22<sup>nd</sup> January 2024**

Having examined this consultation document our comments on behalf of the landowners [REDACTED] are as follows:

We note that the site formerly referred to as LAA/LIP-011 land off Haslemere Road, Liphook in the land availability assessment of 4<sup>th</sup> July 2022 has not been included in this draft plan as a proposed development and are disappointed that the Council have decided not to include it at this draft stage.

Liphook is one of the largest settlements and is identified as a Tier 2 settlement and that new allocations through the Local Plan will augment the existing overall need for new homes until 2040 estimated to be a further 111 dwellings proposed for this settlement.( this is excluding any additional land that might be brought forward as windfall sites). Our site located south of Haslemere Road and east of Devils Lane is closest to the site proposed as LIP3 land at Chitley Farm.

Since making our previous submissions and adjusting the details proposed for the site to accommodate the requirements for SANG that reduced the numbers proposed to 29 dwellings we have now had to reassess the viability of the scale of development because of the Biodiversity Net Gain requirements that have come into effect in January 2024 and the need to minimise loss of existing habitats, together with requirements for the design of the road junction. The scheme is now consequentially amended to relate to a development of 9 detached dwellings with a substantial area provided for local use for SANG and provision of acoustic reduction details due to proximity to the railway land to the south.

This brings the scheme to be outside the classification of “ major development “ and under the threshold for allocated sites in the Local Plan. It should therefore be regarded as a windfall site and it

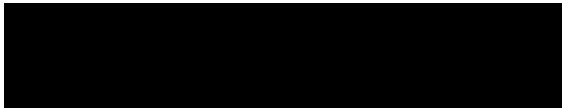
has also been confirmed that an Environmental Assessment is not required in connection with this proposed development.

Support is therefore given to figure 12.15 policy relating to the promotion of housing sites at Liphook as a Tier 2 settlement but with an amendment to figure 12.16 to include this site south of Haslemere Road to be acknowledged as a windfall site. This will be brought forward as a planning application within the next few weeks.

Please also refer to the submission being made as a response to the local plan consultation and forwarded to you by John Shephard from JJ Design 1a King Edward Road, Bedford, MK41 9S on behalf of the developer Templeview Developments Ltd and which will form the basis of the planning application for the development of this parcel of land due to be provided by the end of January 2024.

If you have any further questions please do not hesitate to contact me on 01395 277707 or by email at [jflplanning@aol.com](mailto:jflplanning@aol.com).

Best wishes



30th January 2024

**From:** [REDACTED]  
**Sent:** 08 March 2024 14:05  
**To:** [EHDC - Local Plan](#)  
**Subject:** LAA Site Submission Forms. Formal objections - Regulation 18 consultation Local Plan 2021-2024  
**Attachments:** scan0666 LAA submission forms, covering letter & Exhibits [REDACTED] March 2024.pdf

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

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

For the att of [REDACTED] Planning Policy Team.

Hi [REDACTED]

I spoke to you recently regarding the possible inclusion of land adjacent to Glamorgan Road and White Dirt Lane in Horndean, in relation to the Land Availability Assessment (LAA) process.

I advised you that the site in total is 4 hectares and that I owned 2 hectares and the adjoining land owner [REDACTED] also owned 2 hectares. The two sites share a mutual boundary between them and adjoin the settlement of Glamorgan Road in Horndean.

I mentioned that I have entered into a joint enterprise agreement with the other landowner [REDACTED] and I would provide a copy of that agreement.

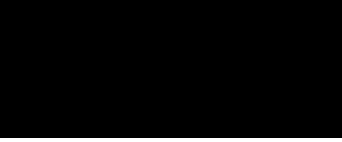
I am now in a position to submit the formal LAA submission on behalf of [REDACTED] in connection with his land comprising 2 hectares. I am not an agent for [REDACTED] just the person who has an equal interest in promoting our joint proposals.

[REDACTED] has prepared a signed letter (enclosed) addressed to you dated 7th March 2024 setting out his case for promoting his site for assessment. The aforementioned letter is intended to record his formal comments/concerns with regards to the Regulation 18 Consultation Local Plan 2021-2024. He has asked me to forward this submission and regulation 18 consultation objections on his behalf.

I am currently preparing my LAA formal submissions that will follow under separate cover, hopefully today. Thank you. Kind regards [REDACTED]

--

Kind regards



## Land Availability Assessment Site Submission Forms

### Enclosures List:

[REDACTED]  
'Land on the north side of White Dirt Lane PO8 0TR'

Covering letter dated 7<sup>th</sup> March 2024

LAA Site Submissions Forms dated 4<sup>th</sup> March 2024

Exhibit 1: Signed joint enterprise agreement document dated 7<sup>th</sup> March 2024.

Exhibit 2: Catherington Garden Suburb layout plan dated 1932.

Exhibit 3: Planning history of the site provided by EHDC.

Exhibit 4: Catherington Garden Suburb layout plan showing developed and undeveloped areas.

Exhibit 5: Land Registry Title and plan. SH 19807. Issued on 23 February 2024.

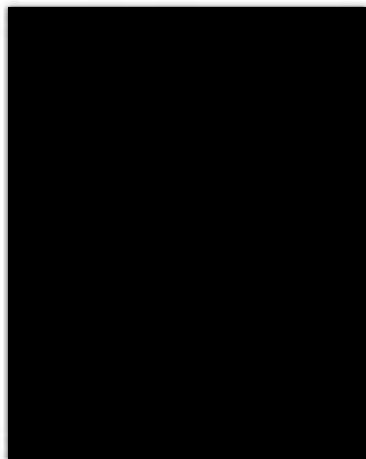
Exhibit 6: Statom Group Limited site assessment letter dated 2<sup>nd</sup> March 2024.

Exhibit 7: Plan Marked JA1 site identification plan of both proposed sites in relation to the proposed allocation site at Drift Road.

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Policy Planning Team  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
GU31 4EX  
7th March 2024



RE : Land Availability Assessment Site Submission Forms.

Dear [REDACTED]

With regards to the LAA site submissions assessment process, I am putting forward a site of approximately 2 hectares that is directly adjacent to the settlement of Glamorgan Road and White Dirt Lane. The adjoining landowner [REDACTED] also has a site of approximately 2 hectares which he is also putting forward under the LAA process. [REDACTED] and my wife and I, are entering into a joint enterprise agreement to develop the two sites as one site for residential development. I have provided a copy of this agreement signed by all parties with an interest in the two proposed sites. [Exhibit 1] I am aware that [REDACTED] spoke with you and another colleague of yours at the Local Plan Consultation at Merchanstan Hall in Horndean. The main purpose of his attendance at this consultation was to discuss the recent proposal to include a site for 80 residential dwellings at Drift Road and White Dirt Lane. We both consider this proposal is in the wrong location for the area and that has prompted us to make our land available for development.

This current proposal represents a significant conflict with two adopted policies namely CP 19 and CP 23, which under normal circumstances the proposed site would not be an acceptable location for residential development. It is because of this strict policy conflict that we have not previously considered putting our land forward for residential development. It is generally accepted I am sure, that under the significant restraints on the areas outside of the South Downes National Park the local planning authority will only have access to residential sites that are more likely than not, to be within the countryside. It seems inevitable that the majority of sites that are allocated will be outside of settlement policy boundaries and within a designated local gap. The question here is whether it is in the most suitable countryside location taking into account all of the available sites.

[REDACTED] was advised at this public consultation venue that anyone who has land within 800 metres of a settlement policy boundary is eligible to put the site forward for consideration and that it would be assessed against the current adopted principles for its suitability. It is our understanding that provided it is available by 31<sup>st</sup> March 2024 it can be considered within the current Local Plan Regulation 18 consultation for the Draft Local Plan 2021-2040. On the basis that the Local Planning Authority are prepared in principle to propose development of the site at Drift Road/White Dirt Lane then the site I am putting up for development along with [REDACTED] site should also be assessed for its suitability. Whilst we have both only identified

one category of development on the official forms, we will both be willing to discuss other alternatives should it be considered the best option for the LPA.

The LPA has no authority to allocate any area or any particular site for development without the landowners formally releasing it for development. That is a restraint they have no control over. It is clear that not all landowners are aware that they have a site that may be of interest to the LPA. This situation significantly restricts the planning policy team to those sites that have been put forward, which does not necessarily mean they are the most appropriate sites, just the sites that are available. I would make the following comments relating to the site adjacent to the Glamorgan Road settlement to be considered.

Notwithstanding the policy conflict with CP19 and CP23, any material considerations that weigh in favour of the sites development should be considered. The site I am putting forward for assessment was given planning permission for residential development dating back to 1932 or thereabouts. It formed part of the development known as the Catherington Garden Suburb. I have provided a layout plan for reference. [Exhibit 2] The development layout plan identifies 115 dwellings to be constructed on the site. World War two stopped the development from completion in 1939 and for reasons unknown the development was abandoned after the war ended in 1945. Since that time several planning applications for residential development have been put forward with various approvals and refusals. A copy of the previous planning history from the council has been provided for reference. [Exhibit 3]

I have provided a further plan showing the original layout that depicts the current areas of residential development of Glamorgan Road edged in red, and the site I am putting forward edged blue. [Exhibit 4].

Had the original development been completed it would have added a further 42 dwellings to the existing settlement. Over one third of the original scheme has been lost due to World War two. I have provided a recent copy of the Land Registry title for the site. [Exhibit 5] The conveyance for the land contains a restrictive covenant at number 3 of the charges register which states "The land thereby conveyed and any building thereon or any part thereof should not be used for any purpose than that of a private dwelling house". The history for this site is not just considered interesting it is relevant.

It is a matter of fact that this land has not been used for agricultural purposes since the residential development commenced in 1932. Where it has been used it has only been for the grazing of horses until 2009 and private equestrian use with stables to the present time. Therefore, the land has not been vacant at any time since World War two and should possibly be considered as a brownfield site as it has previously been released for residential development. The history should carry some weight in considering its suitability for residential development as it would complete the Catherington Garden Suburb as it was originally intended.

Other considerations that are material to the proposed site's development;

The site is bordered by the settlement on two flanks for the most part and contained on the other two flanks by a well-established tree and high hedge border. The site is therefore in line with principle 1 that a settlement boundary will where possible follow defined features such as walls, fences, **hedgerows**, roads, canals and woodland. The site is well contained by these enclosing features which separates the site from open countryside. Principle 2b. As a suitable site for planned allocations, it satisfies principle 2 C 1), 2), and 3).

There are no losses to agriculture.

The site is not in a flood plain area.

The site is not in an area of any special designation such as A National Park, Green belt, or Nature reserve, etc.

The National Planning Policy Framework does not support settlement policy boundaries for countryside locations.

The National Planning Policy Framework promotes sustainable development in rural areas.

*Planning policies should identify opportunities for villages to grow and thrive especially where this will support local services.*

This must apply equally to the settlements of Glamorgan Road as it has a settlement policy boundary and is within the countryside.

The access for my site is the current access along Glamorgan Road. The best access to the site is via White Dirt Lane which is considered to be a sustainable link between Clafield and Catherington. Whilst I accept a topographical survey has not yet been carried out, I am confident that the existing access from White Dirt Lane can be considered capable of a site line of 43 metres at 2.4 metres from the tarmac running surface of the highway without obstruction at the height of 1.0 metre.

The development of the site bordering White Dirt Lane will afford an opportunity for a foot path to be provided for the full length of the site contributing to highway safety for those walking to the local shops for their day-to-day needs. This includes other local people who regularly walk the lane.

A provisional site viability assessment report with regards to any site constraints has been provided by a well-established developer and groundworks specialist employed by Statom Group Limited. [Exhibit 6] The assessment of the site presents no restraints that can't be satisfactorily overcome and supports the deliverability of the maximum number of dwellings appropriate for the site within a two year period from commencement. The only site restraint identified is within the land owned by Mr Saunders Not the land I am putting forward.

The site proposal for the development of the land at Glamorgan Road and the adjoining land owned by [REDACTED] has been identified upon a plan marked JA1 [Exhibit 7]. The purpose of the plan is to illustrate the perceived gap in relation to the proposed development at Drift Road which is coloured brown and blue on the plan and the proposed development of my site coloured yellow and [REDACTED] site coloured orange on the plan.

The Gap Policy reflects the actual physical impacts of development of land within the local gap and the perceived impacts related to travellers when leaving one settlement and arriving at another. When leaving the settlement of Clafield the proposed development (brown land) will significantly physically and visually form a screen to the open nature of the existing land. At the point of leaving the proposed enlarged settlement of Clafield travellers will be looking directly at the settlement of Glamorgan Road which is already on the skyline thus no perception of any gap between these two settlements at this point. I will readily concede that the land coloured blue will not harm the perceived gap or the physical gap when travelling towards Catherington. Perhaps the provision of some development for both sites should be considered as a good compromise to the current allocations position.

When travelling down White Dirt Lane the residential development at White Dirt Farm Mews is the point that travellers perceive is leaving the settlement towards Clanfield. This development has a significant length of two-metre-high close boarded fencing that has a hard urban feel about it. A recent appeal decision has confirmed that White Dirt Farm Mews is not isolated and is closely related to the adjacent settlement. The perceived gap between that point and the proposed development coloured brown leaves travellers no perception of leaving one settlement before arriving at the next. Of course, this all a matter of opinion and I am of the opinion that the extent of the orange coloured land beyond the White Dirt Farm Mews buildings and the significant impact of the close boarded fencing is minimal when compared to the extent of the brown coloured land.

I am aware that the LPA will require a phase 1 & 2 environmental study report and possibly a transport statement if the site progresses to that point. These are standard practices, and I am not aware at this stage of any site restraints in relation to these requirements.

I have endeavoured to give as much information as possible so that the planning policy team can assess the land suitability for residential development of the land that I own and the land that Mr Saunders owns as a joint enterprise proposal.



**To whom it may concern**

1st March 2024

This document sets out an agreement between the registered owners of Title Number SH 19807 being [REDACTED] of [REDACTED]

[REDACTED] who are joint proprietors of land on the north side of White Dirt Lane, Clanfield, Waterlooville shown edged in red on the Land Registry title plan.

And

Title Number HP 504852 being [REDACTED]

[REDACTED] who are the owners and joint proprietors of land on the north west side of White Dirt Lane, Catherington, Waterlooville, PO8 0TN shown edged in red on the Land registry plan.

No third parties' benefit from any securities on either registered titles.

**The agreement:**

To enter into a joint enterprise development proposal with regards to the submission to East Hampshire District Council for the consideration of development of the land contained within the above Land Registry Titles for residential purposes.

The reason for the joint enterprise agreement is to make the best use of the land as one parcel of land that will benefit the landowners, the development potential and the local planning authority.

The benefits are:

The land contained within title SH 19807 is currently being used by the owners for private equestrian use. The land has previously been allocated for residential development dating back to 1932. The settlement of Glamorgan Road formed part of the original housing scheme known as the Catherington Garden Suburb as did the land contained within title SH 19807. The land immediately adjoins the settlement that it was originally part of, making the site visually more acceptable to its location in the countryside.

The land contained within Title HP 504852 immediately adjoins the land within title SH 19807. The access to the land within SH 19807 is via Glamorgan Road that is a no through Road. By amalgamating these two sites safe access can readily be achieved via White Dirt Lane which is a sustainable link between Clanfield and Catherington.

Moreover; both parcels of land are not being used for agricultural purposes and therefore no losses to agriculture will be made by the proposed development should the site be allocated.

The development will be seen against a backdrop of well established development rather than an undeveloped area where new development will dominate the skyline. The settlement of Glamorgan Road is in a sustainable area and expansion of this settlement is as acceptable in planning terms as the alternative site proposal at Drift Road and White Dirt Lane. The list of benefits is not exhaustive.

This document page is used to authenticate the agreement made on the 1st March 2024 between the registered proprietors of the following Land Registry Titles:

SH 19807: Registered Proprietors:

[Redacted]

And

HP504852: Registered Proprietors:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

**East Hampshire District Council  
Land Availability Assessment / Brownfield Land Register  
Site Submission Form**

- Please complete a separate form for each site you wish to promote
- You must complete the form in full
- You must attach Land Registry information confirming ownership(s) of the land
- If you are an agent submitting a site on behalf of a landowner, you must attach a letter from the landowner confirming that their permission has been granted for you to promote the site.

**Your details**

Name
Company / Agent
Representing
Contact Address
Contact Telephone No.
E-mail

**Site details**

**Full address of site** (this must be accompanied by a map showing the site boundary). Without this mapped information we are unable to register the site.

WINTHROPIE  
LAND ON THE NORTH SIDE OF WINTHROP LAKE, CHURCHDOWN HANTS, POB OTR

**Site area (hectares)**

2 X HECTARES

**Landowner details** (Please note: you must attach a copy of the title register for the land you have identified for development. This is available from the Land Registry and will enable the Council to confirm the identity of the landowners) if you are an agent submitting a site on behalf of a landowner, you must also attach a letter from the land owner confirming that they are content for the site to be promoted





Once commenced, how many years do you think it would take to develop the site? 2 years

Please provide an indicative phasing plan for proposals over 100 dwellings/10,000sqm.

#### Known Site Constraints

To the best of your knowledge, are there any constraints that may affect development on the site? Please identify using the options below and provide any additional information:

Access	<input checked="" type="checkbox"/>	Legal issues	<input type="checkbox"/>
Tree cover	<input type="checkbox"/>	Contamination / pollution	<input type="checkbox"/>
Topography	<input type="checkbox"/>	Environmental designation (Ecology)	<input type="checkbox"/>
Important open space	<input type="checkbox"/>	Flood risk	<input type="checkbox"/>
Listed Building(s) or Ancient Monument	<input type="checkbox"/>	Infrastructure/utility requirements	<input type="checkbox"/>
Local character	<input type="checkbox"/>	Market viability	<input type="checkbox"/>
Ownership issues	<input type="checkbox"/>	Cables, pylons, electricity lines, or pipelines	<input type="checkbox"/>

Please provide further details on the constraints identified above, or any additional constraints that you are aware of:

THE ACCESS TO THE SITE IS CURRENTLY VIA GEMERGAN ROAD WHICH IS A HOTTHROUGH ROAD, WHILST THIS ACCESS WOULD BE RESPONSIBLE FOR THE SIDE OF THE SITE. I AM ENTERING INTO A JOINT ENTERPRISE AGREEMENT WITH THE ADJOINING LAND OWNER MR RICHARD SANDERS WHO IS ALSO OFFERING HIS 2 HECTARE SITE FOR RESIDENTIAL DEVELOPMENT. THE ADJOINING LAND ABUTS WHITE DIRT LANE AND HAS A SUITABLE ACCESS POINT FOR OUR JOINT PROBLEMS. THE PROPOSED ACCESS IS EXISTING.

Do you believe the constraints on the site can be overcome? If so, please explain why and how  
Please Note: The Council encourages the submission of site studies from site promoters to help support the submission of their site suggestion. If it is unknown if a site constraint can be overcome, it may be deemed as not being deliverable/developable until further information becomes available.

Y.S. EXPLANATION GIVEN ABOVE.

#### Surveying the Site

In identifying such a site, you are giving permission for an officer of the Council to access the site in order to ascertain site suitability. In this context would there be any access issues to the site? If yes, please provide contact details of the person who should be contacted to arrange a site visit.

THE SITE IS SECURED AT THE ACCESS FROM GEMERGAN ROAD END AND

I WOULD NEED TO ATTEND THE SITE. HOWEVER, IT WOULD BE POSSIBLE TO VIEW THE SITE FROM MY NEIGHBOUR'S SITE FROM THE SOUTH END VIA A GATE WITHIN OUR BOUNDARY. IN THIS REGARD I WOULD SUGGEST THAT BOTH SITES CAN BE VIEWED AT THE SAME TIME AND MR SANDERS COULD FACILITATE THIS AND HAS CONFIRMED THIS. HIS CONTACT DETAILS ARE DETAILED ON HIS LAA SITE SUBMISSION FORM.

Any other relevant information?

#### DATA PROTECTION STATEMENT

The information contained within your response may be shared with other Council employees or agencies who may be involved with the process. Please note that the Council is obliged to make the site information available as part of the evidence base but will not publish personal information such as names, telephone numbers, email addresses or private addresses.

#### PRIVACY NOTICE

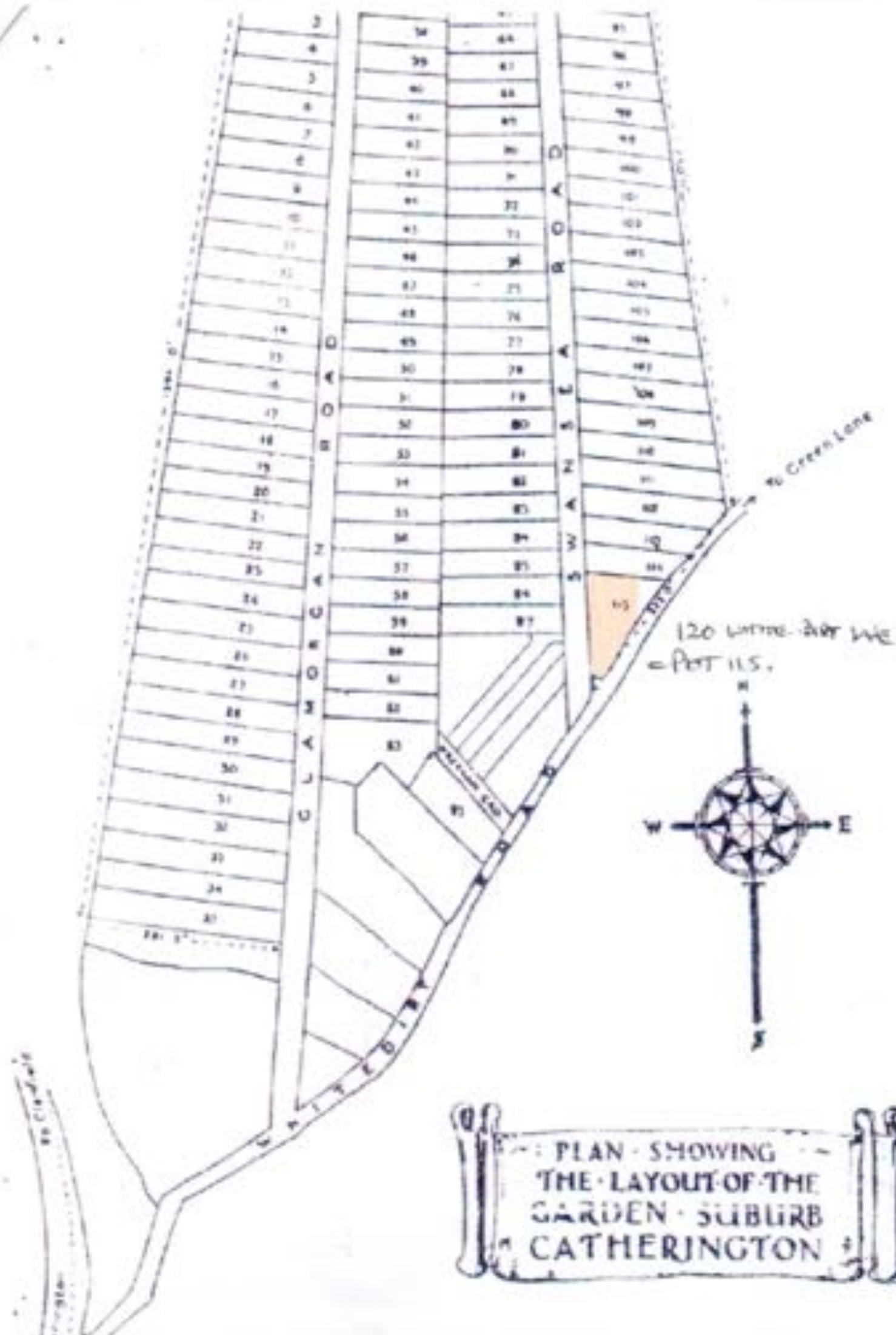
For more information on how your data is used and how we protect your privacy please read the Planning Policy privacy notice, which can be viewed using this link to our website, <https://www.easthants.gov.uk/service-privacy-notices>

Name

Date

4 MARCH 2024

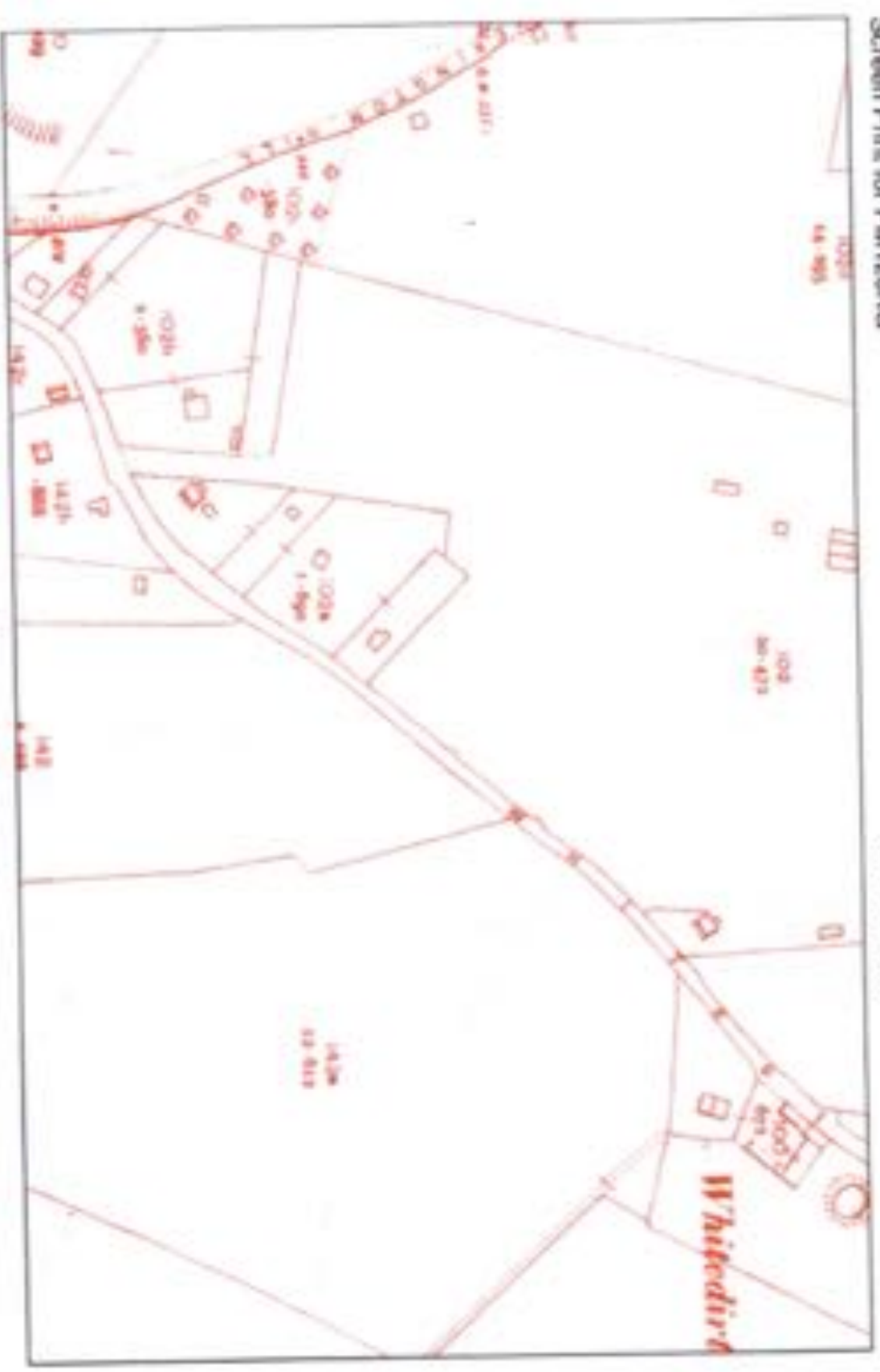
Please return your completed Site Submission Form to [localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

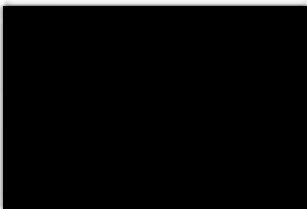


PLAN SHOWING THE LAYOUT OF THE GARDEN SUBURB CATHERINGTON

Screen Print for PM120KG

Scale 1:25000





Enquiries to: Mrs K Cook  
 Direct Dial: 01753 234248  
 Our Ref: SOLLET/KMC  
 Your Ref:  
 Direct Fax: 01753 234348  
 e-mail address:

4<sup>th</sup> August 2005

Dear 

Re: Site History on Land adjacent to Glamorgan Road and White Dirt Lane,  
 Catherington.

Thank you for your letter and payment of £35 in respect of a site history on the above land.

The applications received for this site are listed below:

**HO/GLA/50**

- PRD 387 Erection of 15 bungalows of Glamorgan Road. Perm 3<sup>rd</sup> Nov 1949.
- PRD 563 Use of land for residential development. Perm 22<sup>nd</sup> Aug 1950
- PRD 563/1 Use of land facing Glamorgan Road for the erection of 19 bungalows.  
 Refused 10<sup>th</sup> Oct 1958.
- PRD 563/2 Residential development on approx 0.5 of an acre of land on the west  
 side of Glamorgan Road. Refused 2<sup>nd</sup> Apr 1963.
- PRD 1977 Use of land fronting Glamorgan Road for the erection of 6 dwellings  
 only. Perm 30<sup>th</sup> June 1955
- PRD 1977/1 Use of land at Glamorgan Road for residential development.  
 Perm 30<sup>th</sup> June 1955
- PRD 2062 Use of approx 6 acres of land for residential development, White Dirt  
 Lane. Refused 11<sup>th</sup> Oct 1955
- PRD 2062 Compensation Notice for refusal of a Planning Permission for  
 residential development on 11<sup>th</sup> Oct 1955.
- PRD 2062/1 Use of approx 7 acres of land off White Dirt Lane for the erection of  
 50 bungalows. Refused 19<sup>th</sup> Sept 1958.
- PRD 2062/2 Residential development on approx 11 acres of land off the east side  
 of Glamorgan Road. Refused 17<sup>th</sup> Apr 1963.

**HO/GLA/26** As above.

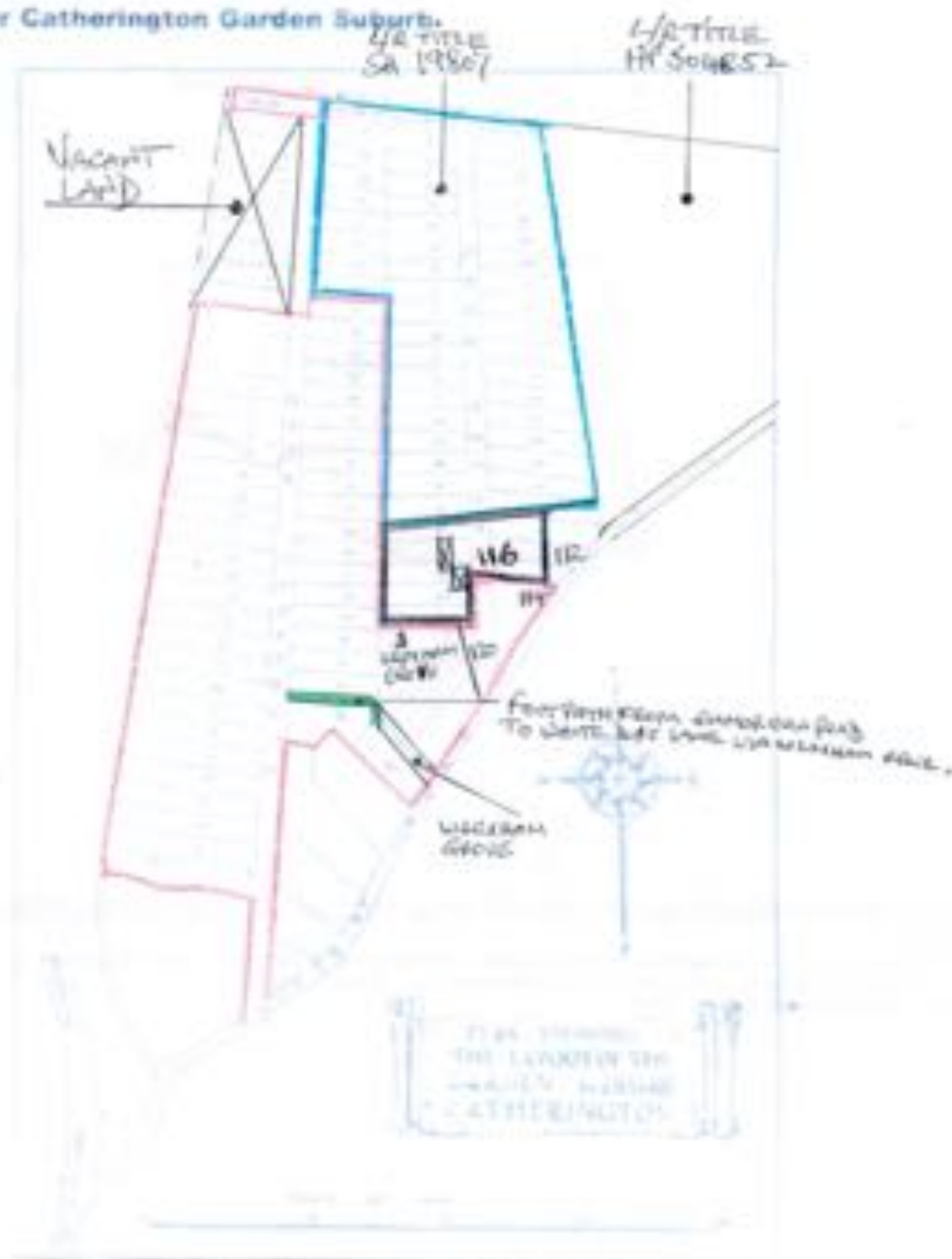
**HO/GLA/49**

- PRD 387 Erection of 15 bungalows off Glamorgan Road. Perm 3<sup>rd</sup> Nov 1949.



## APPENDIX 3.2

Plan for Gathering Garden Suburb.



Site plan showing the layout of the garden suburb, Gathering Garden.



## Official copy of register of title

Title number SH19807

Edition date 21.03.2017

- This official copy shows the entries on the register of title on 23 FEB 2024 at 13:50:08.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 23 Feb 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Weymouth Office.

### A: Property Register

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

HAMPSHIRE : EAST HAMPSHIRE

- 1 (21.05.2001) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Land on the north side of White Girt Lane, Clanfield, Waterlooville.
- 2 (21.05.2001) A Conveyance of the land in this title and other land dated 11 June 1923 made between (1) Ernest Albert Sibbey and (2) Benjamin Grubb contains the following provision:-  
  
"the Purchaser his heirs and assigns shall not by reason of the Conveyance hereinbefore contained obtain any right to the access of light or air which will or may interfere with the use of any other property of the Vendor for building or other purposes."
- 3 (21.10.2005) The land has the benefit of the rights granted by a Transfer of the land in this title dated 21 September 2005 made between (1) John Ashley Hooper and (2) Jonathan William Adams and Samantha Louise Adams.  
  
NOTE: Copy filed.
- 4 (25.04.2007) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.
- 5 (09.08.2007) A new title plan based on the latest revision of the Ordnance Survey and showing an amended extent has been prepared.
- 6 (21.03.2017) The land has the benefit of any legal easements reserved by a Transfer of the land edged and numbered SH46390 in green on the title plan dated 14 March 2017 made between (1) Jonathan William Adams and Samantha Louise Adams and (2) Robert John Saunders but is subject to any rights that are granted by the said deed and affect the registered land.  
  
NOTE: Copy filed under SH46390.



Title number SH19807

## B: Proprietorship Register

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

### Title absolute

- 1 (21.10.2005) PROPRIETOR: [REDACTED]
- 2 (21.10.2005) The price stated to have been paid on 21 September 2005 was £40,000.

## C: Charges Register

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

- 1 (21.05.2005) A Conveyance of the land in this title and other land dated 9 November 1945 made between (1) Ivor Francis Solomon and (2) John Wupper contains the following restrictive stipulations:-  
  
\*subject to the restrictions and stipulations contained in the Schedule hereto in far as the same now relate to and affect the property hereby conveyed and which restrictions and stipulations the Purchaser hereby covenants with the Vendor to observe and perform so far as aforesaid and to indemnify the Vendor and the estate of the said Herbert George Solomon in respect of any breach or non-observance or non-performance thereof.  
  
THE SCHEDULE before referred to.  
  
1. ....  
2. ....  
3. The land thereby conveyed and any building thereon or any part thereof should not be used for any purpose other than that of a private dwellinghouse.  
4. ....  
5. No shows swings roundabouts booths or caravans house on wheels shed or other chattels intended for use as a sleeping apartment should be permitted or allowed on any part of the land thereby conveyed.  
6. Any building to be erected on land thereby conveyed should be set back at least 20 feet from and should front the road on which same abutted.  
7. To the existing rights of way for the owners of adjoining property to pass over the roads and footpath coloured Green and Yellow on the said plan.  
8. To reserve the pieces of land marked Yellow and Green on the said plan as Roadways and footpath.\*  
  
NOTE 1: The roadway known as Glamorgan Road forms part of the land coloured Green referred to.  
  
NOTE 2: The land coloured Yellow referred to above has been tinted blue on the title plan.

End of register

HM Land Registry  
Official copy of  
title plan

Title number **SH19807**  
Ordnance Survey map reference **SU691558**  
Scale **1:1250 enlarged from 1:2500**  
Administrative area **Hampshire - East**  
**Hampshire**



© Crown Copyright. Reproduced by permission of the Controller of Her Majesty's Stationery Office. Ordnance Survey map reference SU691558. Scale 1:1250 enlarged from 1:2500. Administrative area Hampshire - East. Hampshire.



To whom it may concern

02/03/2024

**RE: Proposed development of 4 Hectares of land at White Dirt Lane POB OTW**

I have been made aware that there is a possible site for residential development on land immediately adjacent to the Glamorgan Road and White Dirt Lane settlement which lies within the boundary catchment of Horndean.

The land being referred too is contained within 2 land registry titles SH19807 being approximately 2 Hectares which is owned by [REDACTED] and Land registry title HPS04852 which is also approximately 2 Hectares which is owned by [REDACTED]. As these two titles are immediately adjacent to each other the landowners have entered into a joint enterprise agreement to formally submit there land to the local planning authority in compliance with the East Hampshire District Council Land Availability Assessment site submission allocations procedure.

I am aware that these forms have yet to be submitted for formal assessment and I have been requested to make a provisional assessment of the viability to deliver new residential dwellings within the boundaries of these two amalgamated sites.

As an established housebuilding group I can confirm that the Statom Group Ltd would be extremely interested in developing this site for residential development. In this regard I make the following comments in relation to any site restraints and limitations for this proposed development. My provisional assessment is as follows:

The site location is immediately adjacent to a well established highway link from Clanfield to Catherington which is considered an acceptable/sustainable means of access to facilitate the proposed development of this site. It currently has safe means of access which is considered to be compliant with the highways act 1980.

Although there has not been any soil samples taken by Statom Group Ltd trial holes have shown that the sub soil is of chalk and flint which is a well established substrata which provides good drainage and sound integrity which eliminates the need for any special engineering ground specifications or costs that could cause risk to the sites practical or commercial viability.

The sites topography is in line with standard sustainable project design processes, and viability assessments. This will ensure this project is deliverable and viable from design to resource and procurement.

**Statom Group Limited**

Statom House, 795 London Road, West Thurrock, Essex, RM20 3LH

Tel: 01708 222 777

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

Registered in England and Wales

Company No: 8785228 VAT 177634867



There is an existing High Voltage pole mounted surface run cable owned by SSE. Recent enquiries with SSE in connection with diverting this supply away from build area has been confirmed as practically viable and is not considered a site restriction that cannot be overcome in connection with this proposed development.

In line with section 30 and 40 of the water act 1991 the existing infrastructure for surface water and foul water is readily accessible. The surface water engineering could be managed on site with good free draining substrata with either attenuation or soakaway designs and the local sewer network could easily sustain the proposed development in principle. Due to the topography of the land engineering levels for this infrastructure are practical and viable with no change to standard construction and engineering solutions in line with the local waters authorities adoptable construction details and sewers for adoption edition 8.

Having reviewed the as built drawings and data sheets from the local utilities network the site has existing gas, electric and water supply all adjacent to the proposed development capable of delivering its needs for local service and infrastructure.

Taking into account the collated information I would propose some outline dates for any standard design proposal for a duration, sequence and programme of these works. I would propose a 36 Week build duration per unit/plot based on a three to four bedroom house. The supporting roads and sewers would be deliverable and viable and the duration of this work be around 20 weeks. The full programme of works to deliver the sites capability would not exceed 2 years from the date of commencement. These works could be phased or built concurrently.

Any queries or requests my details are attached below

Kind Regards



**Statom Group Limited**

Statom House, 755 London Road, West Thurrock, Essex, RM20 3LH

Tel: 01708 222 777

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

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J A 1

Perceived GAP

DOUBLE THE PERCEIVED GAP

HP504852

SH19807

EXISTING SETTLEMENT: PLOTS  
CHANGES ADDED RED. GENERAL ROAD  
WITH DISTANCE.