

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

Date: 29 February 2024

Our ref: 15877/01/MS/RN/30007237v3

Dear Sir/Madam

East Hampshire Draft Local Plan Regulation 18 consultation

Chapter 3 – Managing Future Development

This letter comprises a formal consultation response to the ongoing East Hampshire Draft Local Plan Regulation 18 consultation ('the emerging Local Plan') which runs until the 4th March 2024.

This consultation response has been prepared by Lichfields on behalf of O'Flynn Group ('OFG'). OFG is promoting the land around Micheldever Station, within Winchester District, as a location for a new Hampshire town which could contribute to the housing needs of Winchester and Hampshire more widely. Our response primarily addresses the housing needs of the area and the extent to which the emerging Local Plan makes provision for those in line with the requirements of the NPPF.

Wider Unmet Need

East Hampshire sits within the Partnership for South Hampshire (PFSH) area and is therefore a signatory to the PFSH Statement of Common Ground (SoCG), the latest revision of which was agreed in September 2023. In considering housing need, the SoCG outlines that should areas within the PFSH continue to have housing needs they cannot fully meet, *"other PFSH LPAs would need to consider whether they could accommodate some of these wider needs through their own local plan reviews, recognising that South Hampshire's housing markets operate across local authority boundaries."* (Para 1.38).

We note that the Local Plan (para 3.10) acknowledges the unmet need position that exists across the Partnership for South Hampshire (PFSH) area. The level of unmet need across the PFSH is quantified within the PFSH Spatial Position Statement (Dec 2023) which confirms that - even assuming a position of zero shortfall within Southampton by not including an apportionment of the urban uplift (as per the December 2023 version of the NPPF) - the shortfall across the PFSH is 11,771 homes over the period 2023-2036.

The PfSH Spatial Position Statement only looks to a horizon of 2036, whereas the constituent plans across the area will look beyond that horizon. The East Hampshire Local Plan address a period of 2021 to 2040. There will be further unmet needs in the period beyond 2036, and as such the inescapable conclusion is that the quantified 11,771 is an under-estimate of unmet need over the minimum 15-year plan period that strategic policies are intended to cover, as required by the NPPF. Addressing this omission should be a minimum requirement of the PfSH and its constituent LPAs if they are to address their policy requirements to address the core tests of soundness.

For the purposes of this consultation response, we refer to the 11,771 figure as a minimum level of unmet need that must be addressed, but do not accept that it is a reasonable central estimate of the position that LPAs must grapple with, given it only addresses a period of less than 15 years from adoption of plans in the area.

Even with this caveat, the unmet need at the sub-regional level (and arising in East Hampshire's neighbouring areas) is clearly subject to three self-evident truths:

- 1 It is unambiguous. It exists and is tangible. To not plan for it will mean families and households' actual needs are going unmet.
- 2 It is defined in scale at a minimum level. It has been quantified through the PfSH. That PfSH forum will have informed the Council's engagement with neighbouring authorities under the duty-to-cooperate, and is presumably to be relied upon as discharging the legal duty-to-cooperate; and
- 3 It is required by policy to be considered and addressed within the parameters of this Local Plan process, either via the Plan making provision for it, or the Plan being based on an agreed strategy that identifies how other neighbouring Local Plans will make provision for it.

If the Council adopts a position contrary that does not positively engage with unmet need in light of these three truths, it would inevitably lead to the inevitable conclusion that the Plan was deliberately turning a blind eye to what exists in plain sight.

National Policy Position

The NPPF is clear that:

“Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas” (Para 11b) (emphasis added)

It is also clear that Local Plans, to be found 'sound', need to be:

“a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; ...

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground...” (Para 35c)

Applied to Hampshire, and this round of Plan-making, it is clear that those authorities within the PfSH progressing Plans will need to ensure those unmet needs are met across the area to be found sound. It would not be sound to “defer” them, neither would it be sound for any authority to not seek to agree how that unmet need is accommodated, where there are practical opportunities to do so, and consistent with achieving sustainable development.

To that end, there are many suitable and deliverable options for growth across the South Hampshire authorities, including sites indicated as in principle suitable within Strategic Housing Land Availability Assessments, which would be consistent with sustainably meeting the unmet needs that exist.

The East Hampshire Draft Local Plan

The emerging Local Plan sits within the context of the above national policy which requires consideration to be given to the wider unmet need of the neighbouring authorities, which given the agreement under the PfSH SoCG, includes those authorities of the wider PfSH sub-region.

The emerging Local Plan identifies that the PfSH has undertaken a ‘Broad Areas of Search’ exercise, which identifies five broad locations, none of which are located within East Hampshire. Whilst this is accurate, it should be noted that the Broad Areas of Search is a high-level assessment with an initial aim of identifying areas which, in relation to the metrics applied for that assessment, are ‘potentially’ the most sustainable locations for growth at the sub-regional level.

The areas identified within this assessment are therefore a starting point for the PfSH to identify potential sites across the sub-region and do not rule out or inhibit the delivery of other areas of growth that individual Local Authorities within the PfSH identify as being suitable to deliver housing.

Indeed, it is likely necessary that there will need to be other sites and locations identified across the area because even with those ‘Broad Areas of Search’ and the capacity provisionally identified for them, there remains unmet needs across the PfSH area of around 2,000 homes.

As previously identified, Para 11b of the NPPF requires strategic policies to consider housing needs that cannot be met within neighbouring areas. We would suggest that East Hampshire is in no way absolved of its policy requirement to consider additional sites for housing to assist the wider unmet need position across the PfSH unless it reaches agreement with those PfSH authorities that those unmet needs can most sustainably be met elsewhere.

The emerging Local Plan acknowledges the extent of the unmet need issue, such that the shortfall across the sub-region is c 12,000. This is a significant level of unmet need that is incumbent on the authorities across South Hampshire to address. Whilst Para 3.11 states that “*any homes surplus to the identified requirements could be attributed to any future identified unmet need, particularly in the South Hampshire sub-region*” this is simply incorrect as a matter of policy. The Plan makes no allowance for housing delivery to meet the PfSH area needs as it is not set out within the defined housing requirement (Policy S1). Without it being in the policy requirement, there is no mechanism by which planned supply can be ‘attributed to any future unmet need’. This is simply not a robust position.

The issue of the wider unmet need needs to be addressed collectively through the emerging local plans across the Hampshire area, and not left to the chance of potential windfall sites in the future, or a local plan review. Quite simply, what would have been the point of the PfSH work on its SoCG if not to

identify the scale of unmet need, identify potential solutions, and then make clear the task required of individual local plans. It is for East Hampshire to address the issue with its neighbouring authorities, including Winchester, as to where suitable and sustainable capacity exists to meet the wider housing needs of South Hampshire. Without that – and absent work which specifically indicates why it is impractical or unsustainable for East Hampshire itself to meet those unmet needs as per NPPF para 35 – East Hampshire’s own local plan cannot be sound.

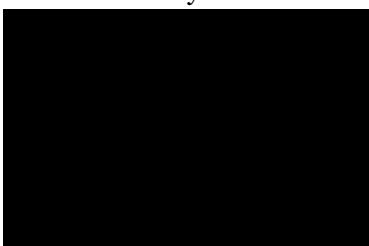
In our view, the area around Micheldever Station provides one such solution to this problem. It would meet the needs of Winchester and Hampshire more widely, and specifically address unmet needs by enabling existing large-scale planned growth at North Whiteley and West of Waterlooville (both now hypothecated by Winchester City Council to meet needs arising in the centre and north of Winchester District) to return to their original function of meeting the unmet needs of South Hampshire. East Hampshire District Council will also be aware that Basingstoke & Deane District Council is currently consulting on a Local Plan which includes a Garden Village proposal at Popham Airfield (adjacent to our clients land at Micheldever Station) which further highlights the intrinsic suitability of the location to support growth.

Summary and Conclusion

As set out above, we note that the emerging Local Plan is cognisant of some of the wider unmet need that exists across South Hampshire, building on the positive (if not wholly adequate – due to its 2036 end date) work carried out through PfSH. Unfortunately, it is failing to do anything positive about it, contrary to the obvious requirements of national policy.

It is considered that the approach of the emerging plan to this unmet need as drafted is unsound. It is not adequately addressed and is seemingly ‘deferred’ by the Plan, contrary to NPPF para 35. As such, we consider that the local plan is not robust, positively prepared or effective. Further work needs to be undertaken by East Hampshire with its neighbouring authorities to establish how the full unmet needs of South Hampshire will be met.

Yours faithfully



HALLAM LAND MANAGEMENT LIMITED

East Hampshire Local Plan 2021-2040 Regulation 18

Consultation Response

March 2024



PLANNING
LIMITED

Contents

1	Introduction	3
2	Plan-making context.....	4
3	Council Vision Local Plan Objectives	7
4	Managing future development.....	9
5	Responding to the Climate Emergency.....	12
6	Alton	14
7	ALTI – Land at Brick Kiln Lane	15
8	Conclusions	16

DOCUMENT CONTROL

Project:	Alton	Job Number:	18.209
Client:	Hallam Land Management Limited	Date:	04/03/2024
Author Initial:	██████	Reviewer Initial:	██████
Issue:	Final	Status:	Submitted
File Origin:	https://lmapplanninglimited-my.sharepoint.com/personal/owenjones_lrmplanning_com/Documents/Documents/Owen's Files 2024/240304 East Hampshire Local Plan Regulation 18 consultation response Hallam Alton.docx		



1 Introduction

- 1.1 These representations have been prepared in response to the East Hampshire Local Plan 2021-2040 Regulation 18 consultation on behalf of Hallam Land Management Limited.
- 1.2 As a matter of principle and approach, the Local Plan should be prepared with the objective of contributing to sustainable development. This is both a requirement of the Planning and Compulsory Purchase Act 2004 (Section 39(2)) and inherent in national policy (paragraph 16(a)). In the context of the planning system, sustainable development is defined by reference to social, economic and environment objectives and the Local Plan's policies and proposals will need to strike a balance between these aspects.
- 1.3 A central and overarching tenet of planning policy is the achievement of sustainable patterns of development. The Local Plan has an active role in guiding new development towards sustainable solutions. It will need to do so having regard to local circumstances and the character, needs and opportunities in East Hampshire. In this regard, the potential for new development at Alton to achieve this has been long recognised.
- 1.4 The exercise undertaken in the previous Issues and Options consultation identified a range of relevant *scene setting* considerations that the Local Plan will need to address. Proposals that promote an appropriate type of development in suitable locations will be an important component part of meeting those challenges.
- 1.5 Our representations are structured as follows:
 - Section 2 describes the scope of national planning policy as it relates to plan-making;
 - Section 3 discusses the objectives that the Council has identified to guide the Local Plan's policies and proposals;
 - Section 4 concerns the strategic policies that relate to managing future development;
 - Section 5 discusses the policies proposed in response to the declared climate emergency;
 - Section 6 concerns Alton as the principal settlement in the District and the focus for new development over the plan period;
 - Section 7 concerns the proposed housing allocation ALTI land at Brick Kiln Lane; and
 - Section 8 provides our conclusions.

2 Plan-making context

- 2.1 The planning system in England operates on the basis of a plan-led system.
- 2.2 The current Joint Core Strategy established the approach to accommodating objectively assessed needs as they existed at the time of its inception. By the present time, different development needs exist over a longer time frame. Similarly, the characteristics of the District have continued to change and evolve with the South Downs National Park now being its own and separate plan-making authority.
- 2.3 In preparing a new Local Plan, there is a statutory duty on the Local Authority to exercise its plan-making function to contribute to the achievement of sustainable development.
- 2.4 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The tests of soundness require that a Local Plan is consistent with national policy and should enable the delivery of sustainable development in accordance with it.
- 2.5 The Plan-Making Section of the NPPF sets out the expected scope and content of a new Local Plan.

Achieving sustainable development

- 2.6 The purpose of the planning system is to contribute to the achievement of sustainable development and there are three overarching objectives – economic, social and environmental. These are interdependent and are to be pursued in mutually supportive ways.
- 2.7 For plan-making, the presumption in favour of sustainable development means that plans should promote a sustainable pattern of development that seeks to meet the development needs of the area, align growth with infrastructure, improve the environment, mitigate climate change and adapt to its effects. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. Only when areas of protection afforded by the NPPF provide strong reasons not to, or when any adverse impacts significantly and demonstrably outweigh the benefits, should this principle be departed from.

Plan-Making

- 2.8 The Local Plan must include strategic policies to address each local authority's priorities. In summary, Local Plans should:
 - a. be prepared with the objective of contributing to the achievement of sustainable development;
 - b. be positively prepared, in a way that is aspirational but deliverable;
 - c. be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - d. contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - e. be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - f. serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Strategic policies

- 2.9 The Local Plan's strategic policies are required to set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:
 - a. housing (including affordable housing), employment, retail, leisure and other commercial development;

- b. infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - c. community facilities (such as health, education and cultural infrastructure); and
 - d. conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 2.10 Moreover, strategic policies should look ahead for a minimum of 15 years from the date of adoption, to anticipate and respond to long-term requirements and opportunities. They should also provide a clear strategy for bringing forward sufficient land, and at a sufficient rate, to address objectively assessed needs over the plan period in line with the presumption in favour of sustainable development. This will include allocating sufficient sites to deliver strategic priorities in the area.

Tests of soundness

- 2.11 The NPPF includes tests of soundness; plans will be sound if they are:
- a. Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.

Delivering a sufficient supply of homes

- 2.12 The Government’s objective to significantly boost the supply of new homes is restated in the new NPPF. To support this, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.
- 2.13 Local housing needs assessments will inform decisions about the minimum number of new homes needed. This will be conducted using the standard method in national planning policy, unless exceptional circumstances justify an alternative approach. In addition, any needs that cannot be met within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for.
- 2.14 In turn, planning policies should identify a sufficient supply and mix of sites taking in to account their availability, suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites for years one to five of the plan and specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15 of the plan.

Promoting sustainable transport

- 2.15 Allied to the above, the planning system should actively manage patterns of growth in support of sustainable transport objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Planning policies should support an appropriate mix of uses across an area and within larger scale sites to minimise the number and length of car journeys needed for employment, shopping, leisure, education and other activities.

Rural Areas

- 2.16 Paragraph 83 of the NPPF requires planning policies to identify opportunities for small settlements to grow and thrive, especially where this will support local services. This is a principle that applies to

East Hampshire given its rural characteristics. As such the Local Plan has an important role in striking a balance between concentration on the one hand and directing and distributing new development across the District to support its rural communities.

Synthesis

- 2.17 The above illustrates central tenets in the NPPF that the new Local Plan will need to be consistent with; the need to plan positively to meet, as a minimum, objectively assessed needs for new development and to ensure that new development is directed to locations to achieve the overarching objectives of sustainable development. It is evident from the consultation document that this has been appreciated in considering alternative development strategies via the Lens approach.
- 2.18 The tests of soundness for a Local Plan exist in the context of the Framework as a whole. Its policy approach towards the *presumption in favour of sustainable development, plan making and strategic policies* are important for understanding and applying those various tests. We have approached our consideration of the consultation document on this basis.
- 2.19 Lastly, whilst the consultation document was approved shortly after the December 2023 revisions to the NPPF, which introduced certain changes, in our opinion those do not change the overarching emphasis placed on sustainable development. In our view, the December 2023 NPPF would not lead to a wholly different approach to that set out as the preferred strategy in the consultation document.

3 Council Vision and Local Plan Objectives

- 3.1 In this Section we comment on the Council's three high level objectives as set out in Chapter 2 of the consultation document.
- 3.2 It is instructive that at the outset the Vision, cast to 2040 and beyond, is for the District's residents to live in "*healthy, accessible and inclusive communities*". Without question, this is worthy and unobjectionable outcome.
- 3.1 Within this context, the consultation document establishes the following Objectives:
- Objective A: providing sustainable levels of growth
 - Objective B: providing better quality, greener development in the right locations
 - Objective C: prioritising the health and well-being of communities in delivering what is need to
- 3.2 These are also unobjectionable. Plainly they draw from the characteristics identified in earlier stages of plan preparation. Moreover, as is evident when comparing those objectives and relevant aspects of national policy there is a high degree of alignment. We support these identified objectives. These objectives should frame the Local Plan's policies and proposals. The extent to which they achieve this will determine the extent to which the Local Plan guides successful outcomes.
- 3.3 In the context of Hallam's representations notable sub-objectives include (A1) provision of a sustainable level of housing growth to meet future housing needs and provide homes for all, helping to deal with issues of affordability and an ageing population; (B4) enabling people to live locally and reduce their reliance on the private car to help reduce the impacts of transport on the environment and improve health and wellbeing; and (C3) [to] maintain and enhance the built and natural environments to support habitats and their connectivity, help the public to access and enjoy open spaces and green infrastructure.
- 3.4 The practical effect of such objectives can be seen in the following terms:
- a) locating new development where it can contribute to reducing climate change and its effects , for example by reducing the need for long distance commuting and supporting the commitment for decarbonising travel;
 - b) directing a significant element of the new development close to the established town and villages in different spatial areas relative to their role and function utilising suitable sites in greater proximity services and facilities, public transport routes, and capitalising upon existing facilities and infrastructure;
 - c) avoiding, where possible, sites that would require challenging and costly infrastructure, with no certainty of delivery in the plan period; and
 - d) improving the sustainability of smaller places, where new development can also help strengthen their identity.
- 3.5 It is inevitable that the Local Plan will result in change for communities across the plan area. The selection of individual sites will need to balance potential harms with the benefits that would be realised. New development is often characterised negatively, but the Local Plan has an immeasurably important role. It will enable:
- a) new homes for young people and families
 - b) specialist accommodation for an ageing population
 - c) supporting community infrastructure; and
 - d) new green infrastructure, to support recreational opportunities and nature conservation and protect historic environment assets.

- 3.6 These are all necessary elements to ensure the well-being of present and future populations. When seen in these terms, the importance of the many facets of the Local Plan can be properly appreciated.
- 3.7 We have approached our consideration of the preferred strategy accordingly.

4 Managing future development

- 4.1 In this Section we comment on the spatial strategy that the consultation document proposes in Chapter 3.
- 4.2 As is evident from the previous Section, the Local Plan will have a fundamental role in shaping growth and change in the District. It will direct new development to suitable locations whilst protecting important environmental assets. In performing this role, it will need to have regard to the characteristics and opportunities and constraints that exist across the District. Earlier consultation documents have explored the extent of options in this regard, and it isn't necessary to revisit those points.
- 4.3 In the context set both by national planning policy and the proposed objectives, the spatial strategy will need to respond to the overarching emphasis on achieving sustainable patterns of development. The consultation document recognises this by the scale and location of growth proposed across different settlements by reference to their role and function.

Spatial Strategy

- 4.4 **Policy S1** is the proposed Spatial Strategy. As drafted it performs a number of functions.
- 4.5 Firstly, it determines the amount of new housing and employment land to be provided in the District between 2021 and 2040 (S1.1, S1.2 and S1.3 refer). Secondly, it establishes, by reference to the settlement hierarchy, the distribution of future development (S1.4 refers).
- 4.6 For the reasons set out below we agree with the underlining premise set out in S1.4 that *“a greater proportion of development [is distributed to] the larger and more sustainable settlements”*
- 4.7 The Settlement Hierarchy Background Paper identify the relative characteristics of settlements in the District. In considering spatial distribution, the importance of actively managing patterns of growth is highly important. The scale of new development at individual locations should be commensurate to the role and function of those settlements.
- 4.8 It is an inescapable fact that the largest settlements in the District give people the greatest opportunity to access services and facilities. This has been acknowledged in previous consultation documents and is an enduring principle that will continue to underpin this present spatial strategy. Accordingly, it is right that the fundamental tenet of the spatial strategy is based on distributing new development at the largest settlements.
- 4.9 In this context, the Local Plan will need to plan positively for new growth at various settlements. It is unrealistic to assume that future development needs can be met without settlements growing and this will require land on the edge of existing urban areas to be identified for new development. Whilst brownfield land should be afforded a priority, it is widely accepted that such resources are limited in their extent and are not sufficient to meet the overall scale of development. Development of greenfield land is therefore a legitimate part of the Local Plan.

Settlement Hierarchy

- 4.10 **Policy S2** defines the proposed settlement hierarchy as the framework for the District Council to achieve its vision to meet the scale of development required and enhance the quality of the built, natural, historic, social and cultural environments, while sustaining the vitality of communities. It of overarching importance to how new development is distributed, how places will grow and change and equally where new development is to be restricted.
- 4.11 The Key Diagram on page 37 of the consultation document defines three spatial areas; these have been a consistent aspect of work associated with a new Local Plan and is soundly based given the characteristics of the District and the extent to which the South Downs National Park imposes itself within the administrative area. Within these spatial areas, settlements are afforded a status that is determined by their role and function.
- 4.12 The Settlement Hierarchy Background Paper considers accessibility to determine the suitability of different settlements to be a focus for new development. It adopts the premise that settlements

that are in a higher tier of the hierarchy will often be more sustainable locations for new development, because new residents would be able to access a greater range of services and facilities more easily without the need to travel large distances by car. It also considers the relative population size of individual settlements as an indicator of relative demand for local services; the larger the local population, the greater the local demand for services and facilities and thus their resilience.

- 4.13 It is right that Alton is afforded the status of a Tier 1 settlement in the settlement hierarchy. Unquestionably this reflects the well-established principle that the scale of development proposals is relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility. The Background Paper reveals the average accessibility score for Alton as 29; a score which is unique across the District.
- 4.14 It follows that we agree that Alton should make a significant contribution to meeting the District's future housing needs; plainly this would contribute to a sustainable pattern of development.
- 4.15 That said, we recognise that certain other smaller settlements have locational merits and local housing need that mean they are suitable locations for some new housing.
- 4.16 Having regard to the nature of the District evident on figures 3.1 and 3.2, the Key Diagram and Settlement Hierarchy respectively, a concentration of development at Tier 1, Tier 2 and Tier 3 settlements, particularly in the North of District is preferable to a wider distribution.
- 4.17 Tier 4 and 5 settlements should be allocated lesser amounts of new housing to avoid the negative effects identified in the background paper – namely increased flood risks, limited support for improvements to services, facilities and services at the most sustainable settlements, a constraint on meeting housing needs where they arise, a more widespread change in the character of the District, and an inherent need to travel to the main settlements to access higher order services in any event.

Housing

- 4.18 Policy S1.1 identifies the number of new homes to be provided in the District (excluding the National Park) between 2021 and 2040.; requiring provision for the delivery of at least 9,082 new homes equivalent to 478 homes per annum.
- 4.19 We agree that the housing requirement should be expressed as a minimum; this is consistent with paragraphs [11b] of the NPPF.
- 4.20 The phrase “*provision for the delivery*” is also important and is welcomed. This illustrates that the District Council understands that in order for the identified number of new homes to be built it has to have a supply of development land that is to an extent larger so as to allow sufficient flexibility, or contingency, in order to ensure that this is achieved. In effect, the housing land supply strategy needs to include a degree of theoretical overcapacity.
- 4.21 Paragraph 3.25 of the consultation document indicates the sources of housing supply, which have been drawn together in the following table.

Policy S1 requirement	At least 9082
Completions 2021-2023	940
Commitments as at 31 st March 2023	3965
Windfall Allowance	1320
Residual Requirement to be met	2857
Chapter 12 allocations	3440
Total Supply	9665

- 4.22 This reveals an extent of theoretical overprovision of 6.5%; this is below the usual allowance of some 10% assumed for Local Plan preparation.
- 4.23 In respect to the plan period, the Local Plan would need to be adopted in 2025 in order to it to achieve the minimum requirement of 15 years post adoption. In our opinion, given that in spring

2024 this is a Regulation 18 Plan, albeit a full plan, the certainty that the remaining statutory stages of plan making can be complete in 12 months (i.e., by 31st March 2025) is unlikely. On account of this, the plan period should be extended until 31st March 2041 with the commensurate albeit modest increase in the housing requirement in Policy S1.1.

- 4.24 We are aware of other representations that indicate additional housing might be required on account of meeting unmet need for adjoining authorities, the extent to which the South Downs National Park is able to realise the amount of new housing directed to it (100dpa), and the approach to windfall development. All of these matters illustrate why the requirement should be viewed as a minimum. As a matter of principle this underscores the role of the allocations proposed by the consultation document.

5 Responding to the Climate Emergency

- 5.25 In this Section we comment on the environmental policies in Chapter 4 of the consultation document. We recognise the importance that new development has in terms of mitigating the effect of climate change by reducing carbon emissions and in terms of adaptation by reducing the risk to future residents and occupants through design measures.
- 5.26 In the first instance, the location of new development is of particular importance. There is an obvious benefit to directing new development to the most sustainable settlements in each of the Plan's sub areas so that, to the extent it is possible in a rural district, there is a co-location of homes jobs, services and facilities by walking and cycling and / or access by public transport connections. This approach also takes advantages of existing and recent infrastructure investment.
- 5.27 This is plainly significant where transport is now the UK's leading carbon emitting sector, with 91% of those emissions coming from road transportation¹. Moreover, research undertaken by the University of Exeter has demonstrated that "*location is the single most important factor to determining potential emissions from new development*" with, in general, transport related emissions reducing where new development was located closer to major urban areas.
- 5.28 Beyond these spatial aspects, the consultation document proposes a range of topic specific policies. We note that paragraph 4.4 refers to Responses to the 'Issues and Priorities' consultation in early 2023 having endorsed the general approach of requiring net-zero carbon development through new planning policies.
- 5.29 Paragraph 157 of the NPPF confirms that the planning system should support the transition to a low carbon future in a changing climate.
- 5.30 For residential development, the Government has established a clear road map for achieving zero carbon ready homes. This is set out in the 'Future Homes Standards,' which is due to be implemented in 2025. The Future Homes Standards will require carbon emissions produced by new homes to be 75-80% lower than those built to previous standards. Any new homes built under these new Building Regulations standards will therefore need to be zero carbon ready, which means that they will immediately be able to benefit from the decarbonisation of the electricity grid.
- 5.31 In a Written Ministerial Statement by the Minister of State for Housing in [December 2023](#), concerning local energy efficiency standards, it was confirmed that:
- "Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes."*
- 5.32 The Ministerial Statement also confirmed that the Government:
- "...does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale."*
- 5.33 **Policy CLIM1** provides broad principles which we support. However, the phrase "*radical reductions*" in CLIM1.2 is imprecise and is open to different interpretations and would conflict with paragraph 16(d) of the NPPF. The word "radical" should be deleted.
- 5.34 CLIM1.3(a) requires net-zero to be achieved through on site measures extend beyond what the NPPF intends for new homes and the application of the Future Homes Standard which anticipates net zero being achieved through decarbonisation of the national grid. To only permit planning permission in the terms of criterion a conflicts with national planning policy. Similarly, in CLIM1.4,

¹ (UK Government EV Charging Strategy).

where it refers to “*its achievement of net-zero requirements*” this should be capable of interpretation by reference to the Building Regulations and the separate decarbonisation of the grid. Amendments to the supporting text to qualify such references would be suitable.

- 5.35 **Policy CLIM2** concerns operational emissions. This is understood from paragraph 4.15 to reach emissions from “unregulated” energy use associated with “*cooking equipment, TVs, white goods, computers, and other appliances that the occupant might plug in at the wall*”. The planning system is concerned with land use planning; it cannot determine how occupants will in turn chose to use in this instance their home. Developers have no means of controlling either the choice or use of appliances in the premises they sell or rent.
- 5.36 The extent to which renewable energy can be provided as part of any development to off-set unregulated emissions is therefore uncertain and limited by the nature of any individual development both in terms of its location, type and potential effects. This requires a balanced approach with the objective to optimise renewable energy but it should not amount to a reason to refuse what is otherwise acceptable development in land use planning terms.
- 5.37 The practical aspects of a “metering, monitoring and reporting system” required by CLIM2.3 must also be scrutinised. In the first instance this requires some form of metering that the developer has access to; this is far beyond the responsibility of any developer who does not retain any long term interest in the properties that are acquired. Moreover, without any mechanism to adjust the occupiers use of unregulated emissions, this requirement serves no practical purpose.
- 5.38 This illustrates the extent to which, although well-meaning, this aspect of policy is not a land use policy and should be deleted.

6 Alton

- 6.1 At Chapter 12, the consultation document applies the settlement strategy and settlement hierarchy proposed in Policy S1 through the distribution of development allocations. Figure 12.1 illustrates the amount, and, in effect, the proportion of new housing directed to different settlements and tiers of the hierarchy.
- 6.2 Alton is the principal settlement in the District as evidenced by the Settlement Hierarchy Background Paper and discussed in Section 4. Figure 12.3 describes the housing supply position at Alton, where completions to date and commitments amount to 1027 new homes, to which the proposed allocations are added to indicate that some 2828 are to be built at Alton. This amounts to 30% of the total requirement. Of the proposed housing identified in Figure 12.1, almost half of the proposed allocations will be provided at Alton, commensurate with its role and function.
- 6.3 In total eight new development locations at Alton are identified in the consultation document. ALT1, ALT4, ALT5 and ALT8 are proposed housing or housing led allocations. ALT2 is land identified for healthcare provision, ALT3, ALT6 and ALT7 are employment allocations.
- 6.4 Together the housing allocations amount to 1264 new homes. Therefore, to achieve the intended 1700 new homes at Alton, the Neighbourhood Plan will need to allocate an additional 430 new homes. This is no small undertaking. To this end, there is scope to increase the capacity of the proposed allocation ALT1 to 250 new homes. We comment specifically on this proposed allocation in the following section.
- 6.5 Site ALT8 is termed a strategic site proposal at Neatham Manor Farm, to provide 1000 new homes along with land for commercial development, a new primary school and community infrastructure. Strategic Sites are often means of achieving a large scale of new development and are countenanced in the NPPF in this regard; we do not object to the principle of such a strategic allocation.
- 6.6 However, its location represents a distinct departure from the existing morphology of Alton which is contained by the A31. New development here would encroach into the countryside beyond the existing established and significant eastern boundary. This also creates severance that has to be overcome in order to ensure convenient movement between the new community and the town and its facilities. Whilst a footbridge across the A31 exists, we note the text indicates this is not presently used for pedestrians and cyclists and this is still to be secured. It is inescapable that Waterbrook Road, a large industrial complex, is unlikely to represent a hospitable environment such that it would encourage such journeys without significant public realm improvements.
- 6.7 Whilst ALT8 may be justifiable in the context of the overall development requirements and the spatial strategy, it is imperative that other suitable development opportunities at Alton that do not give rise to these impacts are developed in the first instance and as a preference. This is especially the case where there are development locations identified that are in closer proximity to the town centre where there are no barriers to movement.

7 ALTI – Land at Brick Kiln Lane

- 7.1 The consultation document proposes to allocate land at Brick Kiln Copse and Basingstoke Road for new housing development. **We support this proposed allocation.** This reflects previous consultation documents and background documents produced in respect of the new Local Plan.
- 7.2 Further residential development at Alton is consistent with the Spatial Strategy in the established Joint Core Strategy and which is being carried through to the new Local Plan. As described in the previous section, Alton is the principal settlement within the District and a sustainable location for new development.
- 7.3 ALTI is situated immediately adjacent to the existing built-up area and west of the development recently completed by Redrow Homes. Its locational characteristics are indivisible from that Site.
- 7.4 The list of constraints and opportunities on page 341 of the consultation document is accurate, although none of those constraints represent issues that preclude sensitive and well-designed development. As illustrated in Appendix 1:
- Appropriate separation with the Grade II listed buildings can be achieved to ensure their significance is conserved;
 - The area of nature conservation can be retained or enhanced;
 - The extent of flood risk is limited and new homes can be situated to avoid being at risk of flooding and without increasing risks elsewhere;
 - A landscape strategy can be employed that minimises and mitigates visual impacts to an extent that they are not significantly adverse and retains separation from Beech;
 - New roundabout can be constructed at Basingstoke Road and Pertuis Avenue that would reduce the current operational limitation of this junction.
 - Improvements to walking and cycling infrastructure can be provided to encourage active travel to the town centre, which is easily accessible by these modes.
- 7.5 Development of this site will contribute towards meeting the need for housing in the area, consistent with the Local Plan's objectives.
- 7.6 The site's capacity is referred to in the consultation document as 150 new homes, although previous estimates have suggested that between 170 and 225 new homes could be accommodated. More detailed work undertaken on behalf of Hallam indicates that the site is capable of being developed for at least 225 new homes.
- 7.7 For the reasons explained in the previous section, ALTI should be allocated as a first priority ahead of development at ALT8 east of the A31.

8 Conclusions

8.1 We have drawn together below our overarching view of the consultation document and the Preferred Strategy presently.

Local Plan objectives

8.2 We support the identified objectives that are intended to underpin the Local Plan. These provide a strong steer towards achieving a Local Plan that contributes to sustainable development. The intent to provide a sustainable level of housing growth to meet future housing needs and to provide homes for all, helping to deal with the issues of affordability and an ageing population, is unobjectionable.

Planning for new homes

8.3 We note that the consultation document calculates a housing requirement of at least 9,082, and that additional development land needs to be allocated to achieve 2,857 new homes. It is beyond question that to meet the identified local housing need, there will be a need to enlarge existing urban areas.

8.4 We have identified that the theoretical overprovision of 6.5% supply is not consistent with that employed in other instances and that, in all likelihood, the plan period should be extended to achieve the necessary 15 years post adoption. Accordingly, those allocations which the consultation document refers to are likely to need to be added to for at least these reasons.

Spatial Strategy

8.5 We support the spatial strategy that underpins the consultation. The strategy rightly aims for closer integration between land use and movement, to reduce the average length and number of motorised journeys; encourage alternative means of travel which have less environmental impact; and reduce reliance on the private car. Without question, this approach fully accords with national policy.

8.6 However, given the rural nature of the District the intent to focus on higher order settlements Tier 1, Tier 2 and Tier 3 is a sound approach. A concentration at one settlement that might occur in other more urban areas is not suitable for East Hampshire.

8.7 Alton is the principal settlement within the District and a sustainable location for new development. Further residential development at Alton is consistent with the Spatial Strategy in the established Joint Core Strategy and which is being carried through to the new Local Plan.

8.8 It is of note that Alton is to accommodate almost half of the proposed allocations that will be provided through the emerging Local Plan. Whilst that is commensurate with its role and function, a substantial number of these are to be identified by Neighbourhood Plan in addition to which is the strategic allocation proposed east of the A31. These characteristics highlight the importance of the other proposed allocations made by the Local Plan at Alton in providing surety of supply in the short and medium term.

ALTI land east of Basinstoke Road, Alton

8.9 The consultation document proposes to allocate land at Brick Kiln Copse and Basingstoke Road for new housing development. **We support this proposed allocation.**

8.10 ALTI is situated immediately adjacent to the existing built up area and west of the development recently completed by Redrow Homes. Its locational characteristics are indivisible from that Site.

8.11 A sensitive and well-designed development can achieve the following:

- Appropriate separation with the Grade II listed buildings can be achieved to ensure their significance is conserved;
- The area of nature conservation can be retained or enhanced;

- The extent of flood risk is limited and new homes can be situated so as to avoid being at risk of flooding and without increasing risks elsewhere;
- A landscape strategy can be employed that minimises and mitigates visual impacts to an extent that they are not significantly adverse and retains separation from Beech;
- New roundabout can be constructed at Basingstoke Road and Pertuis Avenue that would reduce the current operational limitation of this junction.
- Improvements to walking and cycling infrastructure can be provided to encourage active travel to the town centre, which is easily accessible by these modes.

8.12 More detailed work undertaken on behalf of Hallam indicate that the site is capable of being developed for at least 225 new homes.

8.13 ALTI should be allocated as a first priority ahead of development at ALT8 east of the A31.

Appendix 1: Land at Basingstoke Way, Alton

LAND AT BRICK KILN LANE & BASINGSTOKE ROAD, ALTON

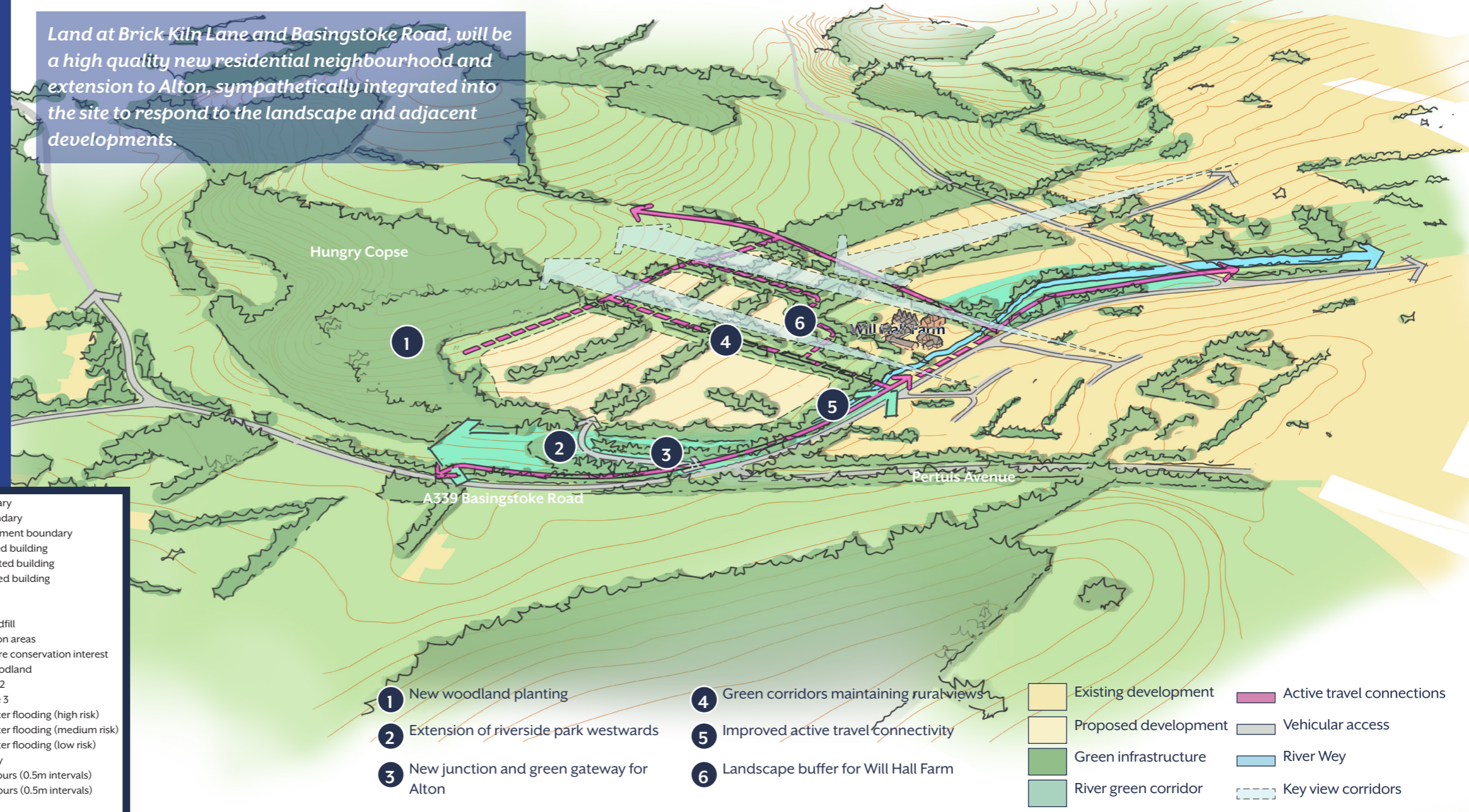
REG 18 CONSULTATION RESPONSE

Alton is the principal settlement within the District. It benefits from a range of facilities, services, employment and public transport such that it is at the apex of the District's settlement hierarchy and represents a suitable location for new housing development. In this context, the emerging Local Plan directs the majority of new housing development to Alton in various ways.

Land at Brick Kiln Lane has previously been identified in earlier consultation documents. New housing here would be conveniently located to the town centre with a genuine opportunity for walking and cycling to local destinations. A careful landscape led masterplan will enable the sensitive assimilation of new development and the protection or enhancement of other environmental assets.

The District Council has ambitious policies to ensure new development achieves a range of benefits, balancing the need for new housing and environmental protection. A collaborative masterplanning process will support a deliverable scheme that can come forward early in the plan period.

Land at Brick Kiln Lane and Basingstoke Road, will be a high quality new residential neighbourhood and extension to Alton, sympathetically integrated into the site to respond to the landscape and adjacent developments.



The site is currently comprised of one large arable field and two smaller fields of improved grassland. The site slopes down towards the south where the source of the River Wey is located. The lower lying, southern part of the site contains a SINC on the former railway embankment as well as a number of trees covered by a TPO and areas of flood zone and surface water flooding.

Brick Kiln Lane borders the site to the east and Basingstoke Road to the south. The northern boundary is bordered by Hungry Copse ancient woodland and SINC and arable land. To the east of the site, setback from the site boundary, is Will Hall Farm which includes a number of Listed Buildings. There are no public rights of way on the site but existing routes are located nearby.

Development at this location has the potential to deliver a number of benefits:

Environmental

The landscape is one of the Parish's greatest assets, providing environmental and wellbeing benefits, as well as shaping the distinct character of the area.

The development will follow a **landscape and context-led approach** which responds positively to the existing site conditions, maintaining the characteristic containment of Alton by the landscape, vegetation and topography.

Green infrastructure will **protect and enhance Hungry Copse Ancient Woodland** and provide habitat connectivity with surrounding ecological features such as the on-site SINC.

Existing **hedgerows and trees will be retained** and supplemented with new species-rich planting.

The open space network will create a variety of types of space including significant green corridors to **protect views towards the surrounding countryside** to the north.

The careful layout of development, streets, open space and tree planting will sympathetically **integrate the development into the landscape**.

A **comprehensive sitewide SuDS network** will be integrated into the open space network to manage water in storm events, helping to relieve pressure from flooding of properties down stream through controlled discharge off-site. The careful design of SuDS will also provide amenity benefits and biodiversity enhancements.

There is potential for the riverside park to be extended to improve connectivity of Alton town centre with the surrounding countryside and **celebrate the source of the River Wey**.

The site will create a range of habitats and wildlife corridors, achieving a **minimum of 10% Biodiversity Net Gain** on site.

Land use

The new neighbourhood will **deliver up to 250 new homes** comprised of a range of house types and tenures.

Development and access will be laid out to **work sympathetically with the existing landscape**, set down from the highest contours and minimising the need for re-profiling of the existing landform.

Development will work with the topography and aspect to capitalise on **opportunities for passive solar gain and energy generation** to help reduce energy consumption.

The development will take a **fabric-first approach** to new homes, providing high levels of insulation and energy conservation.

New buildings will be designed to use and **reference the historic materials palette of Alton**, contributing to the distinctiveness of the town.

The development would make contributions to **community infrastructure** to provide wider benefits for the town.

Connectivity

The development will help **improve walking and cycling connectivity** within the site and beyond to the surrounding neighbourhoods, town centre and countryside, encouraging healthy and active lifestyles.

Benefitting from the compactness of Alton and the direct routes to the town centre, the new development will be just a **20 minute walk from the heart of the High Street**.

The new neighbourhood benefits from **close proximity to the public transport network** with existing stops adjacent to the site. There is potential for improvements to the bus stops to provide wider community benefits.

A **new junction on the A339 will create a high quality green gateway to Alton**, contributing to an enhanced sense of transition between town and country as well as improving road safety and pedestrian and cycling connectivity.

Tree-lined streets will be designed as spaces to be used by all, prioritising people over vehicles.

The development will help **strengthen the connection of Alton with the wider landscape** through links to the existing public rights of way.

CARDIFF OFFICE

22 Cathedral Road, Cardiff, CF11 9LJ
02920 349737

admin@lrmpanning.com
lrmpanning.com

© LRM Planning Limited 2024

EXETER OFFICE

Winslade Manor, Manor Drive,
Clyst St Mary, Exeter EX5 1FY, 01392 690060



Registered Office: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ
Registered in England and Wales No 08618388 VAT Reg No 196 5837 49



RTPI
Chartered Town Planner

HALLAM LAND MANAGEMENT LIMITED

East Hampshire Local Plan 2021-2040 Regulation 18

Consultation Response

March 2024



PLANNING
LIMITED

Contents

1	Introduction	3
2	Plan-making context.....	4
3	Council Vision and Local Plan Objectives.....	7
4	Managing future development.....	9
5	Responding to the Climate Emergency.....	12
6	Four Marks.....	14
7	FM4 land south of Winchester Road	15
8	Conclusions.....	16

DOCUMENT CONTROL

Project:	Four Marks	Job Number:	18.201
Client:	Hallam Land Management Limited	Date:	04/03/2024
Author Initial:	██████	Reviewer Initial:	██████
Issue:	Final	Status:	Submitted
File Origin:	████████████████████ ██ ██ ████████████████████		



1 Introduction

- 1.1 These representations have been prepared in response to the East Hampshire Local Plan 2021-2040 Regulation 18 consultation on behalf of Hallam Land Management Limited.
- 1.2 As a matter of principle and approach, the Local Plan should be prepared with the objective of contributing to sustainable development. This is both a requirement of the Planning and Compulsory Purchase Act 2004 (Section 39(2)) and inherent in national policy (paragraph 16(a)). In the context of the planning system, sustainable development is defined by reference to social, economic and environment objectives and the Local Plan's policies and proposals will need to strike a balance between these aspects.
- 1.3 A central and overarching tenet of planning policy is the achievement of sustainable patterns of development. The Local Plan has an active role in guiding new development towards sustainable solutions. It will need to do so having regard to local circumstances and the character, needs and opportunities in East Hampshire. In this regard, the potential for new development at Alton to achieve this has been long recognised.
- 1.4 The exercise undertaken in the previous Issues and Options consultation identified a range of relevant *scene setting* considerations that the Local Plan will need to address. Proposals that promote an appropriate type of development in suitable locations will be an important component part of meeting those challenges.
- 1.5 Our representations are structured as follows:
 - Section 2 describes the scope of national planning policy as it relates to plan-making;
 - Section 3 discusses the objectives that the Council has identified to guide the Local Plan's policies and proposals;
 - Section 4 concerns the strategic policies that relate to managing future development;
 - Section 5 discusses the policies proposed in response to the declared climate emergency;
 - Section 6 concerns Four Marks, a Tier 3 settlement in the northern sub-area, as settlement suitable for a modest scale of new housing over the plan period;
 - Section 7 concerns the proposed housing allocation FMS4 land south of Winchester Road; and
 - Section 8 provides our conclusions.

2 Plan-making context

- 2.1 The planning system in England operates on the basis of a plan-led system.
- 2.2 The current Joint Core Strategy established the approach to accommodating objectively assessed needs as they existed at the time of its inception. By the present time, different development needs exist over a longer time frame. Similarly, the characteristics of the District have continued to change and evolve with the South Downs National Park now being its own and separate plan-making authority.
- 2.3 In preparing a new Local Plan, there is a statutory duty on the Local Authority to exercise its plan-making function to contribute to the achievement of sustainable development.
- 2.4 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The tests of soundness require that a Local Plan is consistent with national policy and should enable the delivery of sustainable development in accordance with it.
- 2.5 The Plan-Making Section of the NPPF sets out the expected scope and content of a new Local Plan.

Achieving sustainable development

- 2.6 The purpose of the planning system is to contribute to the achievement of sustainable development and there are three overarching objectives – economic, social and environmental. These are interdependent and are to be pursued in mutually supportive ways.
- 2.7 For plan-making, the presumption in favour of sustainable development means that plans should promote a sustainable pattern of development that seeks to meet the development needs of the area, align growth with infrastructure, improve the environment, mitigate climate change and adapt to its effects. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. Only when areas of protection afforded by the NPPF provide strong reasons not to, or when any adverse impacts significantly and demonstrably outweigh the benefits, should this principle be departed from.

Plan-Making

- 2.8 The Local Plan must include strategic policies to address each local authority's priorities. In summary, Local Plans should:
 - a. be prepared with the objective of contributing to the achievement of sustainable development;
 - b. be positively prepared, in a way that is aspirational but deliverable;
 - c. be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - d. contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - e. be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - f. serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Strategic policies

- 2.9 The Local Plan's strategic policies are required to set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:
 - a. housing (including affordable housing), employment, retail, leisure and other commercial development;

- b. infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - c. community facilities (such as health, education and cultural infrastructure); and
 - d. conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 2.10 Moreover, strategic policies should look ahead for a minimum of 15 years from the date of adoption, to anticipate and respond to long-term requirements and opportunities. They should also provide a clear strategy for bringing forward sufficient land, and at a sufficient rate, to address objectively assessed needs over the plan period in line with the presumption in favour of sustainable development. This will include allocating sufficient sites to deliver strategic priorities in the area.

Tests of soundness

- 2.11 The NPPF includes tests of soundness; plans will be sound if they are:
- a. Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.

Delivering a sufficient supply of homes

- 2.12 The Government’s objective to significantly boost the supply of new homes is restated in the new NPPF. To support this, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.
- 2.13 Local housing needs assessments will inform decisions about the minimum number of new homes needed. This will be conducted using the standard method in national planning policy, unless exceptional circumstances justify an alternative approach. In addition, any needs that cannot be met within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for.
- 2.14 In turn, planning policies should identify a sufficient supply and mix of sites taking in to account their availability, suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites for years one to five of the plan and specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15 of the plan.

Promoting sustainable transport

- 2.15 Allied to the above, the planning system should actively manage patterns of growth in support of sustainable transport objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Planning policies should support an appropriate mix of uses across an area and within larger scale sites to minimise the number and length of car journeys needed for employment, shopping, leisure, education and other activities.

Rural Areas

- 2.16 Paragraph 83 of the NPPF requires planning policies to identify opportunities for small settlements to grow and thrive, especially where this will support local services. This is a principle that applies to

East Hampshire given its rural characteristics. As such the Local Plan has an important role in striking a balance between concentration on the one hand and directing and distributing new development across the District to support its rural communities.

Synthesis

- 2.17 The above illustrates central tenets in the NPPF that the new Local Plan will need to be consistent with; the need to plan positively to meet, as a minimum, objectively assessed needs for new development and to ensure that new development is directed to locations to achieve the overarching objectives of sustainable development. It is evident from the consultation document that this has been appreciated in considering alternative development strategies via the Lens approach.
- 2.18 The tests of soundness for a Local Plan exist in the context of the Framework as a whole. Its policy approach towards the *presumption in favour of sustainable development, plan making and strategic policies* provide are important for understanding and applying those various tests. We have approached our consideration of the consultation document on this basis.
- 2.19 Lastly, whilst the consultation document was approved prior to the December 2023 revisions to the NPPF, which introduced certain changes, in our opinion those do not change the overarching emphasis placed on sustainable development. In our view, the December 2023 NPPF would not lead to a wholly different approach to that set out as the preferred strategy in the consultation document.

3 Council Vision and Local Plan Objectives

- 3.1 In this Section we comment on the Council's three high level objectives as set out in Chapter 2 of the consultation document.
- 3.2 It is instructive that at the outset the Vision, cast to 2040 and beyond, is for the District's residents to live in "*healthy, accessible and inclusive communities*". Without question, this is worthy and unobjectionable outcome.
- 3.1 Within this context, the consultation document establishes the following Objectives:
- Objective A: providing sustainable levels of growth
 - Objective B: providing better quality, greener development in the right locations
 - Objective C: prioritising the health and well-being of communities in delivering what is need to
- 3.2 These are also unobjectionable. Plainly they draw from the characteristics identified in earlier stages of plan preparation. Moreover, as is evident when comparing those objectives and relevant aspects of national policy there is a high degree of alignment. We support these identified objectives. These objectives should frame the Local Plan's policies and proposals. The extent to which they achieve this will determine the extent to which the Local Plan guides successful outcomes.
- 3.3 In the context of Hallam's representations notable sub-objectives include (A1) provision of a sustainable level of housing growth to meet future housing needs and provide homes for all, helping to deal with issues of affordability and an ageing population; (B4) enabling people to live locally and reduce their reliance on the private car to help reduce the impacts of transport on the environment and improve health and wellbeing; and (C3) [to] maintain and enhance the built and natural environments to support habitats and their connectivity, help the public to access and enjoy open spaces and green infrastructure.
- 3.4 The practical effect of such objectives can be seen in the following terms:
- a) locating new development where it can contribute to reducing climate change and its effects , for example by reducing the need for long distance commuting and supporting the commitment for decarbonising travel;
 - b) directing a significant element of the new development close to the established town and villages in different spatial areas relative to their role and function utilising suitable sites in greater proximity services and facilities, public transport routes, and capitalising upon existing facilities and infrastructure;
 - c) avoiding, where possible, sites that would require challenging and costly infrastructure, with no certainty of delivery in the plan period; and
 - d) improving the sustainability of smaller places, where new development can also help strengthen their identity.
- 3.5 It is inevitable that the Local Plan will result in change for communities across the plan area. The selection of individual sites will need to balance potential harms with the benefits that would be realised. New development is often characterised negatively, but the Local Plan has an immeasurably important role. It will enable:
- a) new homes for young people and families;
 - b) specialist accommodation for an ageing population;
 - c) supporting community infrastructure; and
 - d) new green infrastructure, to support recreational opportunities and nature conservation and protect historic environment assets.

- 3.6 These are all important elements to ensuring the well-being of present and future populations. When seen in these terms, the importance of the many facets of the Local Plan can be properly appreciated.
- 3.7 We have approached our consideration of the preferred strategy accordingly.

4 Managing future development

- 4.1 In this Section we comment on the spatial strategy that the consultation document proposes in Chapter 3.
- 4.2 As is evident from the previous Section, the Local Plan will have a fundamental role in shaping growth and change in the District. It will direct new development to suitable locations whilst protecting important environmental assets. In performing this role, it will need to have regard to the characteristics and opportunities and constraints that exist across the District. Earlier consultation documents have explored the extent of options in this regard, and it isn't necessary to revisit those points.
- 4.3 In the context set both by national planning policy and the proposed objectives, the spatial strategy will need to respond to the overarching emphasis on achieving sustainable patterns of development. The consultation document recognises this by the scale and location of growth proposed across different settlements by reference to their role and function.

Spatial Strategy

- 4.4 **Policy S1** is the proposed Spatial Strategy. As drafted it performs a number of functions.
- 4.5 Firstly, it determines the amount of new housing and employment land to be provided in the District between 2021 and 2040 (S1.1, S1.2 and S1.3 refer). Secondly, it establishes, by reference to the settlement hierarchy, the distribution of future development (S1.4 refers).
- 4.6 For the reasons set out below we agree with the underlining premise set out in S1.4 that *“a greater proportion of development [is distributed to] the larger and more sustainable settlements”*
- 4.7 The Settlement Hierarchy Background Paper identify the relative characteristics of settlements in the District. In considering spatial distribution, the importance of actively managing patterns of growth is highly important. The scale of new development at individual locations should be commensurate to the role and function of those settlements.
- 4.8 It is an inescapable fact that the largest settlements in the District give people the greatest opportunity to access services and facilities. This has been acknowledged in previous consultation documents and is an enduring principle that will continue to underpin this present spatial strategy. Accordingly, it is right that the fundamental tenet of the spatial strategy is based on distributing new development at the largest settlements.
- 4.9 In this context, the Local Plan will need to plan positively for new growth at various settlements. It is unrealistic to assume that future development needs can be met without settlements growing and this will require land on the edge of existing urban areas to be identified for new development. Whilst brownfield land should be afforded a priority, it is widely accepted that such resources are limited in their extent and are not sufficient to meet the overall scale of development. Development of greenfield land is therefore a legitimate part of the Local Plan.

Settlement Hierarchy

- 4.10 **Policy S2** defines the proposed settlement hierarchy as the framework for the District Council to achieve its vision to meet the scale of development required and enhance the quality of the built, natural, historic, social and cultural environments, while sustaining the vitality of communities. It of overarching importance to how new development is distributed, how places will grow and change and equally where new development is to be restricted.
- 4.11 The Key Diagram on page 37 of the consultation document defines three spatial areas; these have been a consistent aspect of work associated with a new Local Plan and is soundly based given the characteristics of the District and the extent to which the South Downs National Park imposes itself within the administrative area. Within these spatial areas, settlements are afforded a status that is determined by their role and function.
- 4.12 The Settlement Hierarchy Background Paper considers accessibility to determine the suitability of different settlements to be a focus for new development. It adopts the premise that settlements

that are in a higher tier of the hierarchy will often be more sustainable locations for new development, because new residents would be able to access a greater range of services and facilities more easily without the need to travel large distances by car. It also considers the relative population size of individual settlements as an indicator of relative demand for local services; the larger the local population, the greater the local demand for services and facilities and thus their resilience.

- 4.13 Having regard to the nature of the District evident on figures 3.1 and 3.2 , the Key Diagram and Settlement Hierarchy respectively, a concentration of development at Tier 1, Tier 2 and Tier 3 settlements, particularly in the North of District is preferable to a wider distribution.
- 4.14 Four Marks is afforded the status of a Tier 3 settlement in S2.2. In the Northern sub-area shown on the Key Diagram, Tier 3 settlements are second to the Tier 1 status of Alton. (i.e., the Tier 2 Settlements are located in separate sub-areas and at themselves the focus for development in those locations).
- 4.15 In the Joint Core Strategy Four Marks is attributed the role of a small local service centre. Contrasting the two approach, the status of Four Marks, is consistent.
- 4.16 Four Marks has a more limited range of services in comparison to Alton but is an important centre serving its community nonetheless. It is important that the emerging Local Plan has policies and proposals that enable this role to be maintained and enhanced so that the intention of living locally can be realised. It remains the case that modest development to meet local needs for housing, employment, community services and infrastructure will secure the continuing vitality and support a thriving community. As such Four Marks is a suitable location to accommodate new housing, but plainly at a scale less than Tier 1 and Tier 2 settlements.
- 4.17 Tier 4 and 5 settlements should be allocated lesser amounts of new housing to avoid the negative effects identified in the background paper – namely increased flood risks, limited support for improvements to services, facilities and services at the most sustainable settlements, a constraint on meeting housing needs where they arise, a more widespread change in the character of the District, and an inherent need to travel to the main settlements to access higher order services in any event.

Housing

- 4.18 Policy S1.1 identifies the number of new homes to be provided in the District (excluding the National Park) between 2021 and 2040.; requiring provision for the delivery of at least 9,082 new homes equivalent to 478 homes per annum.
- 4.19 We agree that the housing requirement should be expressed as a minimum; this is consistent with paragraphs [11b] of the NPPF.
- 4.20 The phrase “*provision for the delivery*” is also important and is welcomed. This illustrates that the District Council understands that in order for the identified number of new homes to be built it has to have a supply of development land that is to an extent larger so as to allow sufficient flexibility, or contingency, in order to ensure that this is achieved. In effect, the housing land supply strategy needs to include a degree of theoretical overcapacity.
- 4.21 Paragraph 3.25 of the consultation document indicates the sources of housing supply, which have been drawn together in the following table.

Policy S1 requirement	At least 9082
Completions 2021-2023	940
Commitments as at 31 st March 2023	3965
Windfall Allowance	1320
Residual Requirement to be met	2857
Chapter 12 allocations	3440
Total Supply	9665

- 4.22 This reveals an extent of theoretical overprovision of 6.5%; this is below the usual allowance of some 10% assumed for Local Plan preparation.
- 4.23 In respect to the plan period, the Local Plan would need to be adopted in 2025 in order to it to achieve the minimum requirement of 15 years post adoption. In our opinion, given that in spring 2024 this is a Regulation 18 Plan, albeit a full plan, the certainty that the remaining statutory stages of plan making can be complete in 12 months (i.e., by 31st March 2025) is unlikely. On account of this, the plan period should be extended until 31st March 2041 with the commensurate albeit modest increase in the housing requirement in Policy S1.1.
- 4.24 We are aware of other representations that indicate additional housing might be required on account of meeting unmet need for adjoining authorities, the extent to which the South Downs National Park is able to realise the amount of new housing directed to it (100dpa), and the approach to windfall development. All of these matters illustrate why the requirement should be viewed as a minimum. As a matter of principle the underscores the role of the allocations proposed by the consultation document.

5 Responding to the Climate Emergency

- 5.25 In this Section we comment on the environmental policies in Chapter 4 of the consultation document. We recognise the importance that new development has in terms of mitigating the effect of climate change by reducing carbon emissions and in terms of adaptation by reducing the risk to future residents and occupants through design measures.
- 5.26 In the first instance, the location of new development is of particular importance. There is an obvious benefit to directing new development to the most sustainable settlements in each of the Plan's sub areas so that, to the extent it is possible in a rural district, there is a co-location of homes jobs, services and facilities by walking and cycling and / or access by public transport connections. This approach also takes advantages of existing and recent infrastructure investment.
- 5.27 This is plainly significant where transport is now the UK's leading carbon emitting sector, with 91% of those emissions coming from road transportation¹. Moreover, research undertaken by the University of Exeter has demonstrated that "*location is the single most important factor to determining potential emissions from new development*" with, in general, transport related emissions reducing where new development was located closer to major urban areas.
- 5.28 Beyond these spatial aspects, the consultation document proposes a range of topic specific policies. We note that paragraph 4.4 refers to Responses to the 'Issues and Priorities' consultation in early 2023 having endorsed the general approach of requiring net-zero carbon development through new planning policies.
- 5.29 Paragraph 157 of the NPPF confirms that the planning system should support the transition to a low carbon future in a changing climate.
- 5.30 For residential development, the Government has established a clear road map for achieving zero carbon ready homes. This is set out in the 'Future Homes Standards,' which is due to be implemented in 2025. The Future Homes Standards will require carbon emissions produced by new homes to be 75-80% lower than those built to previous standards. Any new homes built under these new Building Regulations standards will therefore need to be zero carbon ready, which means that they will immediately be able to benefit from the decarbonisation of the electricity grid.
- 5.31 In a Written Ministerial Statement by the Minister of State for Housing in [December 2023](#), concerning local energy efficiency standards, it was confirmed that:
- "Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes."*
- 5.32 The Ministerial Statement also confirmed that the Government:
- "...does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale."*
- 5.33 **Policy CLIM1** provides broad principles which we support. However, the phrase "*radical reductions*" in CLIM1.2 is imprecise and is open to different interpretations and would conflict with paragraph 16(d) of the NPPF. The word "radical" should be deleted.
- 5.34 CLIM1.3(a) requires net-zero to be achieved through on site measures extend beyond what the NPPF intends for new homes and the application of the Future Homes Standard which anticipates net zero being achieved through decarbonisation of the national grid. To only permit planning permission in the terms of criterion a conflicts with national planning policy. Similarly, in CLIM1.4,

¹ (UK Government EV Charging Strategy).

where it refers to “*its achievement of net-zero requirements*” this should be capable of interpretation by reference to the Building Regulations and the separate decarbonisation of the grid. Amendments to the supporting text to qualify such references would be suitable.

- 5.35 **Policy CLIM2** concerns operational emissions. This is understood from paragraph 4.15 to reach emissions from “unregulated” energy use associated with “*cooking equipment, TVs, white goods, computers, and other appliances that the occupant might plug in at the wall*”. The planning system is concerned with land use planning; it cannot determine how occupants will in turn chose to use in this instance their home. Developers have no means of controlling either the choice or use of appliances in the premises they sell or rent.
- 5.36 The extent to which renewable energy can be provided as part of any development to off-set unregulated emissions is therefore uncertain and limited by the nature of any individual development both in terms of its location, type and potential effects. This requires a balanced approach with the objective to optimise renewable energy but it should not amount to a reason to refuse what is otherwise acceptable development in land use planning terms.
- 5.37 The practical aspects of a “metering, monitoring and reporting system” required by CLIM2.3 must also be scrutinised. In the first instance this requires some form of metering that the developer has access to; this is far beyond the responsibility of any developer who does not retain any long-term interest in the properties that are acquired. Moreover, without any mechanism to adjust the occupiers use of unregulated emissions, this requirement serves no practical purpose.
- 5.38 This illustrates the extent to which, although well-meaning, this aspect of policy is not a land use policy and should be deleted.

6 Four Marks

- 6.1 At Chapter 12, the consultation document applies the settlement strategy and settlement hierarchy proposed in Policy S1 through the distribution of development allocations. Figure 12.1 illustrates the amount, and, in effect, the proportion of new housing directed to different settlements and tiers of the hierarchy.
- 6.2 Four Marks has historically performed the role of a local service centre and is now proposed as Tier 3 settlement. It is described in the Settlement Strategy Background Paper as:
- “[having a relatively large population considering its accessibility-based ranking, and is close to the top of its tier in terms of average accessibility scores”***
- 6.3 Figure 12.21 describes the housing supply position at Four Marks, where completions to date and commitments amount to 69 new homes, to which the proposed allocations are added to indicate that some 280 new homes are to be built at Four Marks. This amounts to less than 3% of the total requirement. Of the proposed housing identified in Figure 12.1, this increases to 6% of the proposed allocations will be provided at Four Marks, commensurate with its role and function.
- 6.4 The amount of new housing to be provided at Four Marks equates to 37% of the overall amount directed to Tier 3 Settlements. This is wholly appropriate on the basis of its location in the north of the District, the range of services and availability, proximity to Alton and the opportunity to travel by public transport and the overall scale of population which, other than Clanfield, is demonstrably larger than other settlements in this category.
- 6.5 Four new development locations at Four Marks are identified in the consultation document. FM3 relates to an extension to the healthcare centre. FM1, FM2 and FM3 are proposed housing allocations.
- 6.6 FM1 is located north of the railway line and thus traffic has to negotiate the railbridge at Lymington Grove. The extent to which access can be provided from the adjoining estate is limited by the character of those estate roads. A substantial part of the site is within the Nitrate Solent River Catchments Area that will require mitigation. Whilst there are a small number of local facilities at Lymington Bottom Road, for the most part local services are on the south side on Winchester Road, including the primary school.
- 6.7 FM2 represents a further southern extension of Blackburry Lane, which is a rural lane. Development here would replicate the linear cul-de-sac pattern at Bernards Avenue.
- 6.8 FM4 in land south of Winchester Road. This was identified as a proposed allocation in the previous Regulation 19 plan.
- 6.9 Development here benefits from direct access to the A31 and avoids the urbanising effect on rural lanes elsewhere. It is immediately adjacent to the recreation ground which has a host of playing pitches, pavilion, allotments and the community facility. The primary school is also located to the south west of the village. New housing here would be consistent with the character of existing development in this part of the village.
- 6.10 New development would be contained by existing development to the east and west and vegetation to the north and south. The A31 provides an existing bus route to Alton and Winchester with bus stops close to the site. Whilst other facilities are located further north, these are accessible by existing walking infrastructure astride the A31. Whilst a planning application for new housing was refused in 2014, the reasons for refusal related to the amount of development proposed at Four Marks at time rather than any suggestion that the site itself is unsuitable.
- 6.11 In contrast to FM1 and FM2, land south of Winchester Road is the preferable allocation.

7 FM4 land south of Winchester Road

- 7.1 The consultation document proposes to allocate FM4 for 100 new homes. We support this proposed allocation.
- 7.2 Work undertaken by Hallam suggests that this capacity could be increased to 125 or alternatively 100 plus specialist accommodation. This scale of development reflects the previous consultation documents and background documents produced in respect of the new Local Plan.
- 7.3 Further residential development at Four Marks is consistent with the Spatial Strategy in the established Joint Core Strategy and which is being carried through to the new Local Plan. As described in the previous section, Four Marks is a suitable Tier 3 settlement and a sustainable location for new development given the rural characteristics of the District overall.
- 7.4 The list of constraints and opportunities on page 433 of the consultation document is accurate, although as evidenced by the previous planning application none of those constraints represent issues that preclude sensitive and well-designed development. As shown at *Appendix 1*:
- New development can be located that protects existing residential amenity;
 - New landscaping can strengthen existing boundaries and improve green infrastructure connections The area of nature conservation can be retained or enhanced;
 - Surface water drainage can be incorporated that ensures new homes are not at risk of flooding and there is no increase in off-site flooding;
 - An appropriate and safe means of access can be formed onto the A31;
 - Connections can be provided to the boundary of the site which would allow routes to the adjoining recreation ground;
 - solar masterplaning can take advantage of the opportunity to achieve southern facing orientation
- 7.5 The District Council's Open Space, Sport and Recreation Needs and Opportunities Assessment 2018 to 2028 identifies opportunities to improve sporting facilities at the Recreation Ground. Whilst there is no apparent need to increase sports pitch provision evident through this Study, the fact that FM4 lies immediately adjacent to it is of particular note.
- 7.6 As part of the proposed development, land can be identified for recreational improvements that could constitute either informal natural space to complement the formal sports provision, or alternatively land to enlarge the area of pitches. Either way, there is scope for a substantially enlarged area of green space.
- 7.7 Development of this site will contribute towards meeting the need for housing in the area, consistent with the Local Plan's objectives, its spatial strategy and the overall rural nature of the District.

8 Conclusions

8.1 We have drawn together below our overarching view of the consultation document and the Preferred Strategy presently.

Local Plan objectives

8.2 We support the identified objectives that are intended to underpin the Local Plan. These provide a strong steer towards achieving a Local Plan that contributes to sustainable development. The intent to provide a sustainable level of housing growth to meet future housing needs and to provide homes for all, helping to deal with the issues of affordability and an ageing population, is unobjectionable.

Planning for new homes

8.3 We note that the consultation document calculates a housing requirement of at least 9,082, and that additional development land needs to be allocated to achieve 2,857 new homes. It is beyond question that to meet the identified local housing need, there will be a need to enlarge existing urban areas.

8.4 We have identified that the theoretical overprovision of 6.5% supply is not consistent with that employed in other instances and that, in all likelihood, the plan period should be extended to achieve the necessary 15 years post adoption. Accordingly, those allocations which the consultation document refers to are likely to need to be added to for at least these reasons.

Spatial Strategy

8.5 We support the spatial strategy that underpins the consultation. The strategy rightly aims for closer integration between land use and movement, to reduce the average length and number of motorised journeys; encourage alternative means of travel which have less environmental impact; and reduce reliance on the private car. Without question, this approach fully accords with national policy.

8.6 However, given the rural nature of the District the intent to focus on higher order settlements Tier 1, Tier 2 and Tier 3 is a sound approach. A concentration at one settlement that might occur in other more urban areas is not suitable for East Hampshire.

8.7 Four Marks is afforded the status of a Tier 3 settlement in S2.2. In the Northern sub-area shown on the Key Diagram, Tier 3 settlements are second to the Tier 1 status of Alton.

8.8 Four Marks has a more limited range of services in comparison to Alton but is an important centre serving its community nonetheless. It is important that the emerging Local Plan has policies and proposals that enable this role to be maintained and enhanced so that the intention of living locally can be realised. It remains the case that modest development to meet local needs for housing, employment, community services and infrastructure will secure the continuing vitality and support a thriving community. As such Four Marks is a suitable location to accommodate new housing, but plainly at a scale less than Tier 1 and Tier 2 settlements.

FM1 land south of Winchester Road, Four Marks

8.9 The consultation document proposes to allocate FM4 for 100 new homes. We support this proposed allocation.

8.10 Work undertaken by Hallam suggests that this capacity could be increased to 125 or alternatively 100 plus specialist accommodation. This scale of development reflects the previous consultation documents and background documents produced in respect of the new Local Plan. Of particular note is that:









- New development can be located that protects existing residential amenity;
- New landscaping can strengthen existing boundaries and improve green infrastructure connections The area of nature conservation can be retained or enhanced;

- Surface water drainage can be incorporated that ensures new homes are not at risk of flooding and there is no increase in off-site flooding;
 - An appropriate and safe means of access can be formed onto the A31;
 - Connections can be provided to the boundary of the site which would allow routes to the adjoining recreation ground;
 - solar masterplaning can take advantage of the opportunity to achieve southern facing orientation
- 8.11 As part of the proposed development, land can be identified for recreational improvements that could constitute either informal natural space to complement the formal sports provision, or alternatively land to enlarge the area of pitches. Either way, there is scope for a substantially enlarged area of green space.
- 8.12 Development of this site will contribute towards meeting the need for housing in the area, consistent with the Local Plan's objectives, its spatial strategy and the overall rural nature of the District.
- 8.13 FM4 should be allocated as a first priority ahead of development at FM1 and FM2 for the reasons given.

Appendix 1: Land south of Winchester Road, Four Marks Concept Plan

Do not scale from this drawing.
 This drawing is for discussion or planning purposes only. The accuracy of this drawing may be reliant upon survey information provided by third parties. Whilst all reasonable efforts are used to ensure drawings are accurate, edge Placemaking Group Ltd accept no responsibility or liability for any reliance placed on, or use of, this plan by anyone for purposes other than those stated above or for errors arising from third party information.

This drawing and the works depicted are the copyright of edge Placemaking Group Ltd and may not be reproduced or amended except by written permission.

-  Site boundary (8.3ha)
-  Existing site access
-  Noise from A31 Winchester Road
-  Existing byway
-  Existing bus stops/request bus stops
-  Existing overhead cables (to be undergrounded)
-  Existing category A tree & tree group
-  Existing category B tree & tree group
-  Existing category C tree & tree group
-  Existing category U tree & tree group
-  Existing category C Hedgerow
-  Root Protection Zones
-  Low flood risk surface water (overland flow path)
-  Proposed site access
-  Proposed residential development
-  Proposed residential development (lower density)
-  Potential care home & co-located retail (tbc)
-  Play / extension to recreation ground
-  Proposed Public Open Space
-  Proposed green link corridor creating connectivity between existing SINC's to north and south. Dark corridors for commuting bats
-  Proposed blue link corridor (SuDS, Swales) along natural flow path if possible
-  Proposed enhancement of landscape edges
-  Proposed attenuation pond with wetland planting
-  Opportunity to protect existing views from Barn Lane towards the east
-  Link to existing byway

Rev.	Date	Description

Land to south of Winchester Rd
 FOUR MARKS

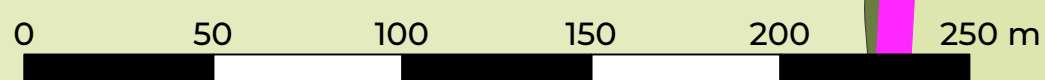
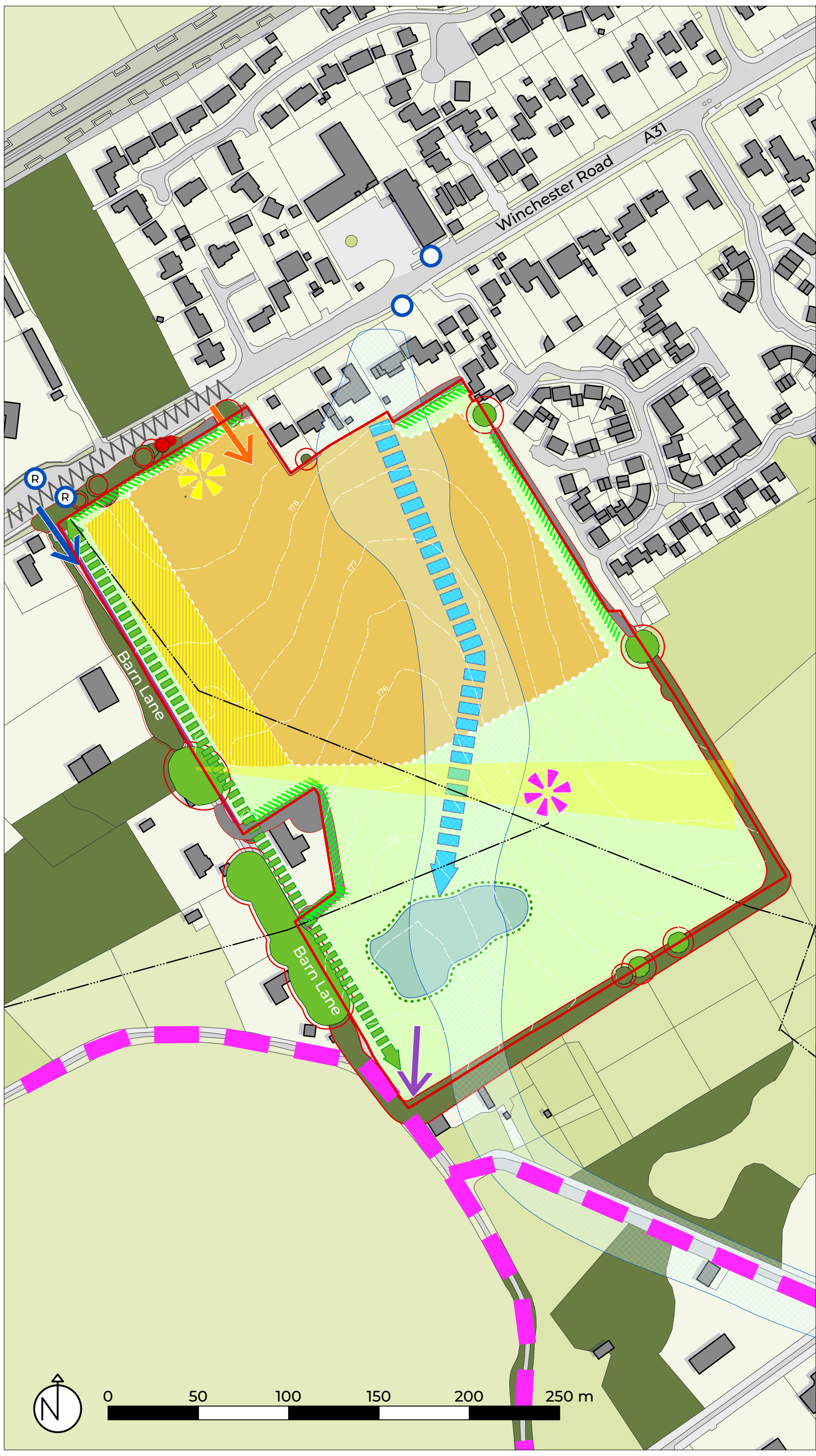
Emerging Concept Plan

Job ref: 551	Drawing number: SK03	Revision:
Scale: 1:2,000 @ A3	Date: February 2024	



part of
edge Placemaking Group Ltd

 Suite 2
 7 Buttermarket
 Thame
 Oxfordshire
 OX9 3EW
  01865 522395
 enquiries@edgeUD.co.uk
 www.edgeUD.co.uk



CARDIFF OFFICE

22 Cathedral Road, Cardiff, CF11 9LJ
02920 349737

admin@lrmp planning.com
lrmp planning.com

© LRM Planning Limited 2024

EXETER OFFICE

Winslade Manor, Manor Drive,
Clyst St Mary, Exeter EX5 1FY, 01392 690060



Registered Office: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ
Registered in England and Wales No 08618388 VAT Reg No 196 5837 49



RTPI
Chartered Town Planner

From: [REDACTED]
Sent: 08 March 2024 13:36
To: [EHDC - Local Plan](#)
Cc: [REDACTED]
Subject: Luken Beck obo Chiltley Lane - East Hants Local Plan Reps - Chiltley Lane
Attachments: [Consultation on EDHC R18 Draft Local Plan - V3 RO.pdf](#)
[Appendix 2 - 1112-01.RPT.M23 Affordable Housing Statement - LP Reps with appendix.pdf](#)

Follow Up Flag: Follow up
Flag Status: Completed

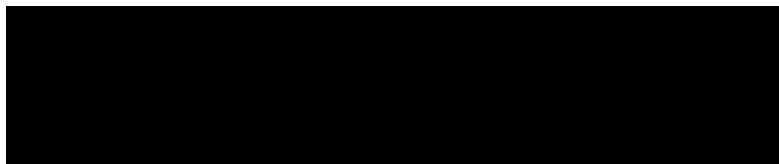
Categories: Consultation Responses

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

Hello,

Please see attached our submission on the Draft Local Plan concerning the site at Chiltley Lane.

Kind regards,



TSP:

- The information contained in this email may either be privileged and/or confidential.
- If you are not the intended recipient please delete this message; using (including disclosure, copying or onward distribution) its content may be unlawful.
- Our messages are checked for viruses, but we cannot accept liability for any viruses which may be transmitted in or with this message or attachments.
- Company Registration No. 07548836

Be green, save money and remember to print double sided.

Planning Policy Team
East Hampshire District Council

Thursday, 7 March 2024

BY ONLINE SUBMISSION

Our Ref:
Your Ref:

Dear Sir / Madam,

**Representations to Regulation 18 Consultation on Draft Local Plan
Response to proposed allocation of Land at Chiltley Farm, Liphook (LIP3) and other
policies.**

We write in response to the above consultation, on behalf of our client Bloor Homes (Southern) Ltd.

Introduction

We welcome, overall, the progress in preparation of the new Local Plan for East Hampshire. It is an important tool in guiding development at the local level. Overarchingly it is important to state as context to that, and to these representations that national policy (NPPF15, 16) confirms:

15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

16. Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Settlement Hierarchy

The DLP sets out that provision for 3,500 homes is to be made, and apportioned to settlements based on the 'Tier' of settlements in the hierarchy established in policy S2. The latter identifies Liphook in Tier 2, alongside Horndean, and Whitehill & Bordon and below Tier 1 which includes Alton only. The previous Settlement Hierarchy Background Paper (Reg 18 Consultation Nov. '22-Jan. '23) confirmed Liphook as a Tier 1 settlement with Alton and Whitehill and Bordon.

The latest background paper¹, however, which is being formally consulted on with the DLP, confirms that there was support (3.9) for including Liphook in Tier 1 due to its collection of schools, mainline railway station, and accessible main built-up area. By contrast, it confirms Four Marks and South Medstead are ranked in Tier 2 because services and facilities *"are not, in reality, accessible for many residents by means of short walking and cycling journeys"*.

The revised assessment of settlement hierarchy is based on a bespoke methodology adopted by Ridge & Partners Accessibility Study. The LSAAT approach based around a 10-minute walk/cycle time to destination (reflecting the 20 Minute Neighbourhood concept). This identifies spatial zones according to accessibility. However, by itself this is not a complete methodological approach as it makes no assessment of the settlement's facilities and services to conclude whether that centre would be accessed or whether residents are likely to drive to other locations.

Ridge & Partners approach should not be relied upon on its own for defining settlement sustainability or therefore a comparative hierarchy. It does not include a balancing qualitative exercise which considers the attractiveness of services available in each settlement (unlike earlier papers), or consider the extent to which that will drive or limit modal choices. The number and quality of services/facilities is a very important consideration and becomes more so when moving down the settlement hierarchy. Guidance on 20 Minute Neighbourhoods²

¹ Revised Settlement Hierarchy – Background Paper January 2024, EHDC

² Section 4.3 "The 20 Minute Neighbourhoods – Creating Healthier, Active, Prosperous Communities An Introduction for Council Planners in England" - TCPA

should be considered. It confirms that rural areas (which we suggest applies to the majority of East Hampshire) pose a different set of challenges and that the focus should be on ensuring a market town “becomes a complete and compact 20-minute neighbourhood” to ensure people, once they are there, would be able to find most of what they need for their everyday lives rather than having to travel to several different places.

The concepts also go further, however, than a focus on walking distances. The TCPA guidance notes (pp19);

“In seeking to make new or existing neighbourhoods more liveable, it is vital to understand the needs of local people and businesses, rather than taking a prescriptive approach to walking times and distances. It is important to recognise that the 20-minute neighbourhood is a holistic approach to place-making, and is not just a matter of improving walking conditions.

Not all neighbourhoods will include a full range of services or facilities accessible by foot, which is why it is important to provide high-quality cycling routes and public transport for longer journeys to other places. Public transport that is affordable, reliable, convenient, clean and accessible can also help to encourage people not to travel by car.”

The zonal approach used does not account for the behaviour or choices available to residents, in the same way as a scoring assessment of the range of facilities. There is clear potential for linked trips in Liphook for pedestrians, say between the large Sainsbury’s supermarket, dental surgery, and railway station. That is lost by the assessment, along with the range of additional other choices. Finally, there is a need to define in a proper way beyond the classification of say a small or large ‘shop’.

By way of a simple qualitative example Sainsbury’s in Liphook, despite its central settlement location provides a significant range of services³ beyond convenience food retail. These include ATM, groceries on demand, clothing, full disability provisions, recycling, a petrol filling station and late hours opening. It is adjacent to the Village Surgery, Millenium Centre, Millenium Green and its community centre, and close walking distance to the train station. By contrast the out-of-centre Morrisons in Horndean offers much the same but is much, much harder to access on foot, removed from the other services and facilities and linked trips will not occur.

Finally, there is no reference in the background paper to the quality of other existing public transport modes, i.e. buses, or the potential to improve these to reinforce accessibility.

As a minimum the Council should not discard earlier work but combine its earlier assessment with this latest approach. Other Tier 2 settlements do not offer the same compact centre or range of services/facilities as Liphook, which are on a par with Alton, and none provide a

³ <https://www.openingtimesin.uk/sainsburys-liphook>

mainline railway connection (that offers a genuinely modal choice to access other main settlements in and beyond East Hampshire).

We do not agree Liphook should be included as a Tier 2 settlement, but rather as a Tier 1 settlement, as in the previous version of the draft Local Plan. This in turn will influence the consideration of spatial distribution of development. EHDC should therefore strongly reconsider this approach and consider increasing the amount of housing development in Liphook due to its credentials as a sustainable location, which will also alleviate other pressures that we identify in this response (particularly tackling housing affordability).

Housing Strategy

The draft local plan proposes to meet a housing requirement to deliver **at least 9,082 homes** that is based upon meeting an annual housing requirement of 478 homes. Paragraph 3.26 confirms the need to find a further **minimum 2,857 new homes**. At this stage all housing allocations are expressed with fixed dwelling numbers.

The Council should not be seeking to meet the minimum delivery of housing to meet targets where, as it will be aware, there are additional pressures that warrant pursuing much more aspirational goals. There are also not any additional sites included to secure a buffer or test additional provisions which does not meet the Framework's requirements to plan positively (NPPF16). Paragraph 60 of the Framework confirms;

"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."

Paragraph 67 requires:

"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."

We do not agree that the Draft Local Plan achieves these goals and does not seek to address, in particular, the level of unmet need for different types and tenures of housing, particularly the need for affordable housing and to tackle very high levels of unaffordability in the District.

Meeting Housing Needs

The Council's present evidence includes the 2022 HEDNA (Iceni Projects). This confirms a need in the District of **420 affordable dwellings per annum** in East Hampshire District. That is 88% of the proposed total annual housing requirement and 48% above the affordable housing requirement for major sites (noting that a significant proportion of residential schemes coming forwards as windfall within the proposed requirement will not include affordable housing at all). Moreover, when considering the influence of affordable stock lost to RTB (Right to Buy) there is a need for 613 affordable dwellings per annum.

The Bramshott and Liphook Neighbourhood Plan process is supported by a further Housing Needs Assessment from 2021⁴. The HNA (page 27, para. 90) confirms **50 affordable dwellings per annum** between 2017/18 and 2035/36 or 450 in total and recommends Neighbourhood Plan policies should seek higher levels of affordable housing provision than the adopted JCS and avenues for delivering greater quantities of affordable housing should be explored.

We enclose as Appendix 1 a report undertaken by Tetlow King. In summary this demonstrates that East Hampshire's track record of affordable housing delivery is historically much lower with 1,757 net (of RTB) affordable homes delivered over the last 12 years, **an average of just 146 per annum**. This represents a shortfall against the predicted needs set out in the 2013 SHMA (which underpinned the 2014 Joint Core Strategy: LPP1) of 1,543 affordable dwellings over the same period. Against the 2017/2018 starting period set by the Aecom HNA for Bramshott and Liphook there has been delivery of 125 new affordable homes against a need for 300, a shortfall of 175 in six years.

As of 8 December 2023 the Council's Housing Register listed 142 households with a specified preference for an affordable home in Bramshott and Liphook Civil Parish out of 1,590. This has increased over the preceding 12 months. The average waiting time for a 4-bedroom home for those in Band 2 is over 3 years while for a household on Band a 3-bedroom home on the housing register will now take over 4 years. Bids for each affordable property in the Parish when they are available range up to 62 per property.

Meanwhile, for market housing the lower quartile prices (sale) are 21% higher than the average across the South East of England and 7% above the average for East Hampshire. Related to lower quartile incomes as a multiple, these prices now stand at 12.51 times. In 2011 this stood at 11.11 times. The national average is 7.37 times (+70%). For the South East It is on average 10.69.

Tetlow King's assessment shows there "are serious and persistent affordability challenges across East Hampshire District" and that relevant indicators show a worsening affordability situation.

Against this context, the DLP only proposes three new allocations in Liphook. Combined they would provide 111 new homes in total. Assuming that each site is fully viable and can provide 40% affordable housing then the allocations will provide 44 affordable homes (LIP1 10; LIP2 8; LIP3 27). Even if all three sites provided 100% affordable housing, they would still collectively meet only two years-worth of the affordable housing need for the parish that has been identified. The shortfall cannot be seriously met by rural exception sites (as per policy H4 or NBE1.1)

⁴ The Bramshott and Liphook Housing Needs Assessment 2021 ("2021 BLHNA") was published in August 2021 by AECOM

This demonstrates that the draft plan needs to significantly increase housing provision within Liphook. The scale of unmet affordable housing need has not been dealt with by the draft plan nor met in a positive or aspirational way contrary to the Framework (NPP15/16). The DLP itself confirms (9.3) planning authorities should boost the supply of market and affordable housing. While it may not prove possible to meet the full identified need any opportunities to meet more of that need must be very seriously considered and supported wherever possible.

In this respect, we raise objections to the draft plan strategy and policies which will not meet Objective A1 (pp31), or through current policies H1 and H3, deliver sufficient affordable housing to meet identified needs or tackle clear and present affordability issues across the District.

LIP3 – Land at Chiltley Farm

Bloor Homes are invested in the District, with other sites and interests including bringing forwards the major strategic site at Land East of Horndean that is allocated in the 2017 Site Allocations DPD.

Bloor Homes, also have an interest in Land at Chiltley Farm, Liphook (LIP3), which as noted within the draft Plan, this site is proposed for allocation for 67 dwellings, out of 111 in total for Liphook. The other sites would provide 24 and 20 dwellings respectively.

A current outline planning application is lodged with EHDC for land at Chiltley Farm (EHDC ref: 22789/007) and is currently under consideration for residential development.

Planning History

The site has previously been subject to a planning appeal (in 2016) for a detailed scheme (seeking full planning permission) for 100 dwellings.

The Inspector found no technical, environmental, or capacity constraints (site or infrastructure) for that level of development. The appeal was dismissed, but solely due to conflict with the spatial strategy in the Joint Core Strategy (which is now out of date). We recommend this decision is very carefully reviewed by the policy and development management team.

2016 Appeal Decision

The Inspector recognised there would be benefits from the proposals, that the site was a “reasonably accessible location” for housing and that there were no technical grounds that would amount to impacts for which permission should be refused.

The appeal decision confirms:

The site would be accessible: “...the main advantage is that the station, some local shops, the doctors’ surgery and dental practice would be within a relatively easy walk for most people.”

- the provision of 40 affordable homes, for which the need is unequivocal, would be

a matter of significant weight.

- closure of the existing access / ceasing of HGV movement provides local improvement
- The site is well contained by mature boundary hedgerows and trees, several protected by TPO, and particularly dense along the sunken Chiltley Lane allowing only limited glimpses into the appeal site. The site's open rural character is diminished by the existing use.
- Actual visual and landscape harm would be limited and localized.
- There would be no adverse impacts to the SDNP's natural beauty or setting.
- The Berg Estate is a low-density residential area designated as an Area of Special Character under saved Policy H9. Detached houses stand well back from the meandering estate roads within an open and verdant setting of mature specimen trees, hedges, lawned frontages and shrubbery.
- Policy H9 controls apply to the estate itself and it would not be correct to apply its principles to the appeal scheme (Chiltley Farm). This would have an altogether different character with a higher density and more enclosed pattern of built development.

East Hampshire 2018 (R18) Draft Local Plan – Withdrawn

The site was included in the 2018 Draft Regulation 18 Local Plan under policy SA2. Within that draft policy the Council considered the site suitable for inclusion as a housing allocation to secure approximately 100 dwellings in line with previous Land Availability Assessments. The draft plan was later withdrawn.

Current planning application

Bloor Homes current application 22789/007 proposes outline permission be granted for up to 100 dwellings. The planning application is advanced and consultations demonstrate there are not any technical objections or issues which would impede planning permission being granted. Discussion with EHDC officers are seeking to identify the suitable upper threshold for development. This is being reviewed and the latest scheme, which we enclose as Appendix 2 shows that c.90 dwellings is eminently achievable while having regard to:

- a) Reflecting the character and urban design principles of the Berg development
- b) Technical constraints
- c) Other policy requirements e.g. public open space, parking etc.

Draft Allocation Criteria

The currently submitted planning application demonstrates that:

Biodiversity: There would not be any significant adverse effects to ecology on the site, or to the adjacent SINC. This is consistent with the findings in the 2016 appeal decision.

Wealden Heaths II SPA: A candidate SANG site is available and deliverable, with Natural England support to mitigate the recreational pressure arising from residential development on the site.

Green Infrastructure: The visual containment provided by the site through mature planting would be protected and retained as demonstrated by the arboricultural assessment and information supporting the current application proposals for up to 100 dwellings. This is consistent with the findings in the 2016 appeal decision.

Flood Risk: The current planning application proposals are supported by a Site Specific Flood Risk Assessment which has been reviewed by EHDC's Drainage Officer and deemed acceptable. Residual comments from HCC, which are not considered to be insurmountable, are in the process of being addressed. This is also consistent with the findings in the 2016 appeal decision.

Access: Safe access to the site and acceptable effects on the local highways network have been demonstrated by the current planning application's Transport Assessment and negotiations with the HCC officers. There would be benefits arising from closing the access onto Chiltley Lane to the south (a sunken lane) and removing large scale agricultural delivery traffic from the network. This is consistent with the findings in the 2016 appeal decision.

Landscape: The current application proposals are supported by LVIA and demonstrate no significant adverse effects will arise. This is consistent with the findings in the 2016 appeal decision.

Noise: The noise assessment accompanying the present planning application demonstrates an acceptable relationship to the northern adjacent railway line. This is consistent with the findings in the 2016 appeal decision.

Heritage: Heritage and archaeological assessments with the current planning application show there are no heritage impacts of any significance. This is consistent with the findings in the 2016 appeal decision.

Agricultural Land Quality: The existing use of the site is for intensive agriculture, and it is not BMV land. Its loss will not have any significant effect on the available resource. This is consistent with the findings in the 2016 appeal decision.

Infrastructure Requirements: We note the site and schemes will be covered by CIL. In respect of bespoke infrastructure provision, the current application proposals (like the 2016 appeal scheme) intends to make improvements to the local bus network, highway network, and will provide on-site betterment through controlling existing overland surface water flows via a positive drainage solution (SuDS). Appropriate provision to infrastructure requirements offsite will also be made via s106.

Quantum of Development:

The draft LIP3 policy limits development on the site to 67 dwellings. This is significantly below the reasonable capacity of the site as demonstrated by the previous appeal decision and the

current planning application proposals. The limit of 67 dwelling would inhibit the site from realising an effective use of land and the employment of efficient densities as supported by national planning policy. It is not made clear why the capacity of 67 dwellings has been chosen but we recognise the Council's desire to reflect evidence in the local character studies and comments in the Summary of LIP3 that confirm:

"Street, block and plot design would need to respond to the locally distinctive characteristics of the Berg Estate, as described through the Local Planning Authority's Neighbourhood Character Study (2018)."

Drawing on the particular findings of the 2016 appeal Inspector we think this ascribes too much weight to reflecting the Berg Estate. An initial transition in character is an important factor but replicating the characteristics of Berg throughout the site is unrealistic and unnecessary as the scheme can create and implement its own character and therefore density. It is not correct to tie the site to the *locally distinctive characteristics* of Berg, particularly when those are not reflecting of the settlement in a wider sense. This is contrary to the principles of the National Design Guide and Framework paragraphs 133 and 135 c, d, and e. While design principles can be derived from the Berg Estate and carried through into an adjacent development, most of the Chiltley Farm site is not closely visually 'adjacent' due to the effect of intervening screening.

A character study of Berg also shows some significant areas and aspects do not comply with prevailing contemporary design guidance and should not be carried through. The enclosed scheme reflects an appropriate balance. It is important to note there are other consequences of failing to make effective use of the site.

The comparative benefits from a higher, but still realistic amount of development (vs that proposed in LIP3) include the additional contribution to housing needs for market and affordable housing.

Sites like this should have the capacity to depart from adjacent character where this meets other NPPF goals. The 2016 appeal decision has already found there is no need to follow the character and density of adjacent development on the Berg Estate. A scheme of 100 dwellings for example would provide 33 more dwellings, and 14 more in affordable tenures, than a scheme of 67. In the context of latent affordable housing need this is an important consideration. The site is not constrained or sensitive in visual, heritage, or landscape terms, and has no overriding technical constraint which should limit density.

As the policies currently worded, which does not seek to optimise the potential of the site we would object to it at present. Evidence shows that the capacity of the site can deliver 90-100 dwellings.

Development Management Policies

On behalf of our client Bloor Homes, we have carefully considered the Draft Local Plan and the policies contained therein. We have addressed each section in turn below.

Section 04 – Responding to the Climate Emergency.

We raise concerns and objections to the requirements outlined in the following draft policies:

- CLIM1 (Tackling the Climate Emergency),
- CLIM2 (Net-Zero Carbon Development: Operational Emissions)
- CLIM3 (Net-Zero Carbon Development: Embodied Emissions)
- CLIM4 (Renewable and Low Carbon Energy)
- CLIM5 (Climate Resilience)

The current approach to sustainable construction is set out by the NPPF and energy performance and water efficiency standards in the Building Regulations. Requirements in the Planning and Energy Act 2008 (Section 1) underpin this structure. Section 1 of the Act permits local authorities to adopt efficiency standards which are more stringent than those in the Buildings Regulations, those efficiency standards must however be set out in regulations or nationally adopted policy. In addition, standards and policies adopted in local plans must not be inconsistent with national policy. The draft local plan policies contain requirements which exceed current Building Regulations and are not in line with the NPPF or PPGs.

CLIM1's requirement that operational carbon dioxide emissions of residential development and major non-residential development to be reduced to net-zero through on-site measures, exceed national policy requirements. CLIM5, at section 2a, also refers to net-zero carbon requirements, not presently supported by national policy. Paragraph 159 of the Framework states new development should be planned for in ways that *"can help to reduce greenhouse gas emissions, such as through its location, orientation, and design"*.

The PPG on Climate Change considers that the challenges of climate change can be addressed through the Local Plan (Paragraph: 003 Reference ID: 6-003-20140612). It provides an example of mitigating climate change by reducing emissions as *"promoting **low carbon** design approaches to reduce energy consumption in buildings, such as passive solar design"*. Both the PPG and NPPF presently use terminology such as *"low carbon"* as opposed to zero carbon. We therefore object to the above as they are not in line with up-to-date national planning policy and guidance.

The requirements of CLIM2.1c are not feasible as it will be impossible to estimate the energy usage and demand of individual households in the future. On this basis we object to this section.

CLIM3 presents another onerous requirement at point 2. We welcome the requirement that throughout the development stages decisions should be taken to identify and make

reductions in carbon emissions as this goes hand in hand with national policy requirements. However, the whole life-cycle emissions calculation, again, goes beyond that expected level of information required in the Framework and PPG, as well as current Building Regulations. Like our objection to CLIM2.1c the process would be particularly onerous given the difficulties in estimating future technology, future energy use and demand of individual householders and the environment in which energy is consumed. It would also be extremely challenging for the LPA to monitor to the extent conditions would simply not be enforceable, also noting the potential changes in external factors as a scheme evolves.

Bloor Homes advocates a move towards net zero, and recognises the Council's ambitions to drive the agenda. However, there should be no requirement for Local Standards in respect of building performance. Instead, the Council should seek to simply refer to national Building Regulations, the Framework and PPG, which are set and evolved by the Government with consideration given to wider supply chain issues and feasibility. On this basis we object to the specific requirements in these policies for net-zero carbon, renewable energy matching annual electricity demand and whole life-cycle emissions calculations.

Section 05 – Safeguarding our Natural and Built Environment

We wish to comment on the following policies proposed in the draft Local Plan:

- Policy NBE8 (Water Quality, Supply and Efficiency)
- Policy NBE10 (Landscape)
- Policy NBE12 (Green and Blue Infrastructure)
- Policy NBE13 (Protection of Natural Resources)

Draft policy NBE8 (Water Quality, Supply and Efficiency) at point 4, requires new residential dwellings to demonstrate that they meet a water efficiency standard of no more than 95l per person per day. This, again, is not in line with Building Regulations (Approved Document G: Requirement G2) which states the requirement is either 125l per person per day or 110l per person per day where the planning authority specifies this as an optional requirement. We object to this more onerous requirement in the policy.

Draft Policy NBE10 will support development which does not have a significant impact on the principles of areas identified within landscape character assessments and where necessary it seeks for proposals to include comprehensive landscape strategies. In our view the policy, deviates from national policy, for example at paragraph 135(c and e) of the Framework which states that while development should be sympathetic to local character and history, the surrounding built environment and landscape setting... policies should not prevent or discouraging appropriate innovation or change (such as increased densities) and should seek to "optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development". As identified with other place making policies in the following section there is no policy in the draft plan to reflect the goals in the Framework of making effective use of land and achieving appropriate densities. In the absence of such the policy

requirements are not positively made, and will inhibit development potential of sites unnecessarily in application.

Draft Policy NBE13 part (e) states that proposals should avoid developing on the best and most versatile agricultural land ***unless the benefits outweigh the need to protect the land*** [our emphasis]. We welcome the flexibility in this wording which reflects the complexities of achieving a planning balance.

Section 06 – Creating Desirable Places

We wish to comment on the following policies proposed in the draft Local Plan:

- Policy DES1 (Well-designed places)
- Policy DES2 (Responding to the Local Character)
- Policy DES3 (Residential Density and Local Character)
- Policy DES4 (Design Codes Policy)

Paragraph (a) of draft Policy DES1 seeks for development to maintain and enhance the built character of the immediate surroundings to enhance its immediate settings and the wider local area. Bloor Homes are conscious of ensuring good design quality and that their developments respect their surroundings and seek to ensure their schemes reinforce or create a strong positive identity (part (b)). However, the wording of part (a) is too restrictive and focused on development relating to the existing area rather than recognising the capability, with sufficient quality, mitigation and good design, a development can create its own identity as recognised by national planning policy and the National Design Guide.

Given the requirements of modern development (and the emphasis on climate resilience in this Draft Plan), such as sustainability credentials, highly engineered highway solutions and affordable housing provision for example, it is not always possible to maintain the character of a surrounding area, which will have been built under far less onerous Policy context. Therefore, a degree of flexibility should be built into the wording of Policy DES1 to say 'in so far as current policy and legislation allows' or similar.

In a similar vein, the wording DES2.1(a and b) which requires development to respect local characteristics for plot size & shape, layout, built form, height, and massing (unless it relates to the Council's design vision at Policy DES1), is too restrictive. It also fails to allow the scope for schemes to form their own character and identity. Part e) states plans should ensure schemes should take account of local landscape and townscape features, such as those within the townscape character assessments, which again is limiting and restricts creativity in both design and room to achieve the requirements of the CLIM policies. As set out above Paragraph 135 (c) of NPPF requires developments to be *"sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)"*. **Consequently we object to this approach as currently worded.**

Draft Policy DES3 focuses on Residential Density and Local Character. Bloor support the policy in so far that it states residential proposals within the settlement boundary must optimise the density of new residential uses through making an effective use of land. However, the policy does then caveat this stating “...whilst delivering a contextually appropriate and coherent built form”.

It continues...“a. The density of proposed residential development, measured in dwellings per hectare within the development site (including street spaces and private amenity space, but excluding areas of public open greenspace and other land uses) is within the range of existing residential densities on streets adjoining the development site”. Paragraphs 123 and 124(c) and (d) of NPPF state “plans should contain policies to optimise the use of land in their area and **meet as much of the identified need for housing as possible**” [our emphasis]. We object to the draft plan policy. As an example, areas of extremely low density may not be feasibly or viably reflected by new development and the policy will impede development either overall or in terms of making the most effective use of land. This would not reflect the aim of the NPPF as described above and so be contrary to national policy. We therefore object to the policy as presently worded.

Section 08 – Delivering Green Connections

Draft Local Plan DGC1.1 encourages the imposition of Grampian conditions in securing the provision of infrastructure. Bloor Homes object to this and argue that Section 106 Agreements are far better placed for securing infrastructure delivery programming. It is unreasonable to impose conditions for the delivery of infrastructure that is wholly reliant on a third party. Moreover EHDC is a CIL charging authority.

We support Policy DGC2 (particularly at point 1) which directs development of more than ten new homes to the most sustainable locations.

Section 11 – Development Management Policies

Policy DM2.2 (Trees, Hedgerows and Woodland) states that the LPA will refuse proposals that threaten the retention of such features if they adversely affect the sites character, amenity or movement of wildlife Bloor Homes recognises the value of trees, hedgerows and woodland in both biodiversity terms and the important roles they can play in an area’s character and amenity value.

Bloor Homes consider that some flexibility should be built into the policy, which allows compensation through replanting to enable the specifics of a site and its development to be considered with a balanced approach. Paragraph 136 of NPPF presents such flexibility where it states; “existing trees are retained wherever possible” and not as an absolute. Moreover, the presence of trees is not an automatic constraint on development and their loss, if required, and replacement, if proposed, should all be considered in the planning balance. The policy as currently worded would impede that approach. The policy is not positively prepared and

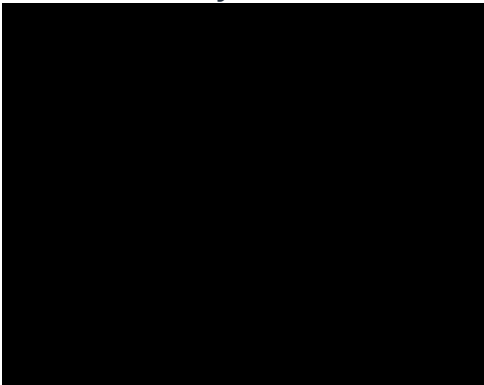
should instead confirm that the Council will support proposals that retain existing important landscape features or demonstrate and justify where they cannot, and provide appropriate replacement landscaping. The policy is not in accordance with national policy. We object to the present wording of policy DM2.2.

In conclusion, Bloor Homes supports the plan led process and the preparation of the draft local plan overall. It is important that Local Authorities have up to date plans in place to control and guide development in their areas and to encourage business investment and deliver certainty for developers to help meet the needs of the area.

Whilst we raise objections to the above policies, we are confident that each of the points can be resolved by the Council and where possible, we have set out suggestions of how this can be achieved.

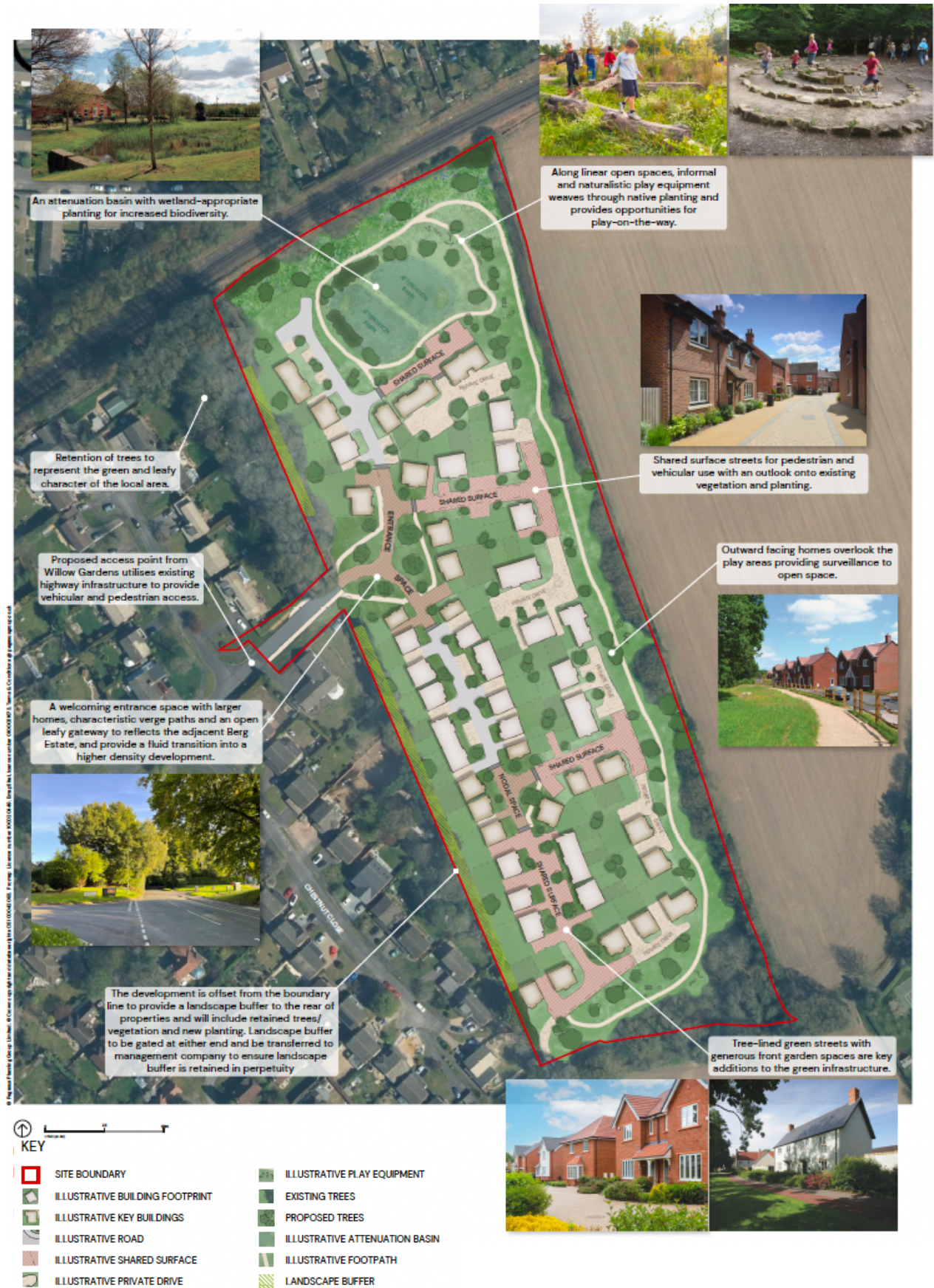
Please do not hesitate to contact me if you have any queries.

Yours Sincerely,



Appendices

Appendix 1: Indicative Masterplan providing 90 dwellings of a mix of size range and tenures.



Appendix 2: Affordable Housing Statement (Separate Attachment)

Affordable Housing Statement

Poultry Farm, Chitley Lane, Liphook, GU30 7HY

Affordable Housing Statement

Poultry Farm, Chitley Lane, Liphook, GU30 7HY

Bloor Homes

March 2024

OUR REF: 1112-01.RPT.M23

TETLOW KING PLANNING
UNIT 2, ECLIPSE OFFICE PARK, HIGH STREET, STAPLE HILL, BRISTOL, BS16 5EL
Tel: 0117 9561916 Email: all@tetlow-king.co.uk

www.tetlow-king.co.uk

Contents

Section 1	Introduction	1
Section 2	The Development Plan and Related Policies	3
Section 3	Affordable Housing Needs	8
Section 4	Affordable Housing Delivery	11
Section 5	Affordability Indicators	18
Section 6	Conclusions and Recommendations	30

Appendices

Appendix TKP1	Freedom of Information correspondence (4 December 2023 & 3 January 2024)	
---------------	--	--

Copyright

This Affordable Housing Statement has been prepared by Tetlow King Planning based on the information provided by the client and consultant team. Tetlow King Planning does not accept liability for any changes that may be required due to omissions in this information. Unless otherwise agreed, this document and all other Intellectual Property Rights remain the property of Tetlow King Planning. When issued in electronic format, Tetlow King Planning does not accept any responsibility for any unauthorised changes made by others.

Introduction

Section 1

- 1.1 This Affordable Housing Statement is prepared by **Tetlow King Planning** on behalf of **Bloor Homes**. It examines the need for affordable housing in the East Hampshire District Council administrative area (where the site is located), as well as the local need for affordable housing in Bramshott and Liphook Civil Parish.
- 1.2 The site is capable of delivering affordable housing which meets the requirements of adopted Policy CP13 of the Joint Core Strategy (2014).
- 1.3 Providing a significant boost in the delivery of housing is a key priority of the Government's National Planning Policy Framework (December 2023). Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.4 This Affordable Housing Statement considers the need for affordable housing and the contribution that the proposed development can make towards meeting the affordable housing needs of the East Hampshire District Council administrative area and of Bramshott and Liphook Civil Parish. It concludes that there is a genuine and acute need for the proposed affordable homes now, and that **substantial positive weight** should be attributed to the provision of affordable housing.
- 1.5 The Statement takes account of a range of affordable housing indicators as well as consideration of national planning policy, performance against plan requirements, affordability issues, and the Council's own corporate objectives.
- 1.6 In undertaking this work, reliance has been placed upon data obtained through a Freedom of Information ("FOI") request which is included at **Appendix TKP1** to this Statement. The request was submitted on 4 December 2023 and a full response was received on 3 January 2024.
- 1.7 This statement comprises the following five sections:
 - Section 2 reviews relevant Development Plan policies and other material considerations relevant to the site;

- Section 3 provides analysis of affordable housing needs;
- Section 4 examines past affordable housing delivery;
- Section 5 identifies a range of affordability indicators; and
- Section 6 sets out our conclusions and recommendations.

The Development Plan and Related Policies

Section 2

Introduction

- 2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), an application should be determined in accordance with the Development Plan unless material considerations strongly indicate otherwise.
- 2.2 The relevant Development Plan in respect of affordable housing for the site comprises the Joint Core Strategy (2014) and the Housing and Employment Allocations Plan (2016).
- 2.3 Other material considerations include the National Planning Policy Framework (2023), the Planning Practice Guidance (March 2014, ongoing updates), the emerging Local Plan 2040, the emerging Bramshott and Liphook Neighbourhood Plan as well as some corporate documents.

The Development Plan

East Hampshire District Local Plan Part 1: Joint Core Strategy (2014)

- 2.4 The Joint Core Strategy (“JCS”) was adopted in May 2014 and covers the East Hampshire District Council administrative area including the area which falls within the South Downs National Park Authority’s jurisdiction..
- 2.5 Section 2 of the JCS sets out the key issues and challenges facing the JCS area. Paragraph 2.5 (page 11) states that *“There is a deficit in affordable housing supply and the current completion rate is below the annual level required to address the deficit (in May 2014 there were 1,920 households on Hampshire Home Choice, registered for property in the EHDC area). Provision of affordable housing in rural areas is particularly problematic.”*
- 2.6 Pages 16 and 17 set out a number of objectives which include *“To make the most efficient use of land and 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”.*

- 2.7 **Policy CP11** (Housing Tenure, Type and Mix) states that *“To address housing requirements and to help to create sustainable communities new residential development will be required to... maximise the delivery of affordable housing; provide a range of dwelling tenures, types and sizes to meet housing needs...”*
- 2.8 **Policy CP13** (Affordable Housing on Residential Development Sites) is the main affordable housing policy within the JCS. The policy requires all residential development sites resulting in a net increase of 1+ dwelling to provide 40% affordable housing provision (or 35% in Whitehill and Bordon).
- 2.9 The policy goes on to state that *“Affordable housing will normally be provided on-site. On smaller sites (4 dwellings or less (net)), where on-site provision is likely to be unsuitable, a financial contribution or off-site provision will be required.”*
- 2.10 The policy also explains that *“The type and size of dwellings, in terms of bedroom numbers, habitable rooms or floorspace will be determined on a site-by-site basis using the most appropriate basis that helps deliver the type and size of affordable units needed, as identified by the Council.”*
- 2.11 The supporting text to Policy CP13 (paragraphs 6.29 to 6.30) states that:
- “The Viability Study has suggested that 40% of affordable housing can be justified on the basis of economic viability in the District. There would need to be justification to impose a higher quota than 40%. However, in some areas this may be feasible given the level of housing need and the limited opportunities for delivering affordable housing.*
- ... The target is therefore set at 40%; in Whitehill & Bordon the target will be 35%. On certain sites a greater percentage may be imposed, with negotiations on a site by site basis. The Policy allows flexibility to consider site specific factors, including market changes, viability and what is right for the community.”*

East Hampshire District Local Plan Part 2: Housing and Employment Allocations Plan (2016)

- 2.12 The Housing and Employment Allocations Plan (2016) was adopted in April 2016. The plan does not include any specific affordable housing policies. Policy LP1 is an allocated site for 175 units in Liphook but the policy does not give any details regarding the level of affordable housing provision expected at the allocated site. The allocated site is located to the north of Liphook whereas this site is located to the South East.

Other Material Considerations

Emerging Local Plan 2040

- 2.13 The emerging Local Plan was subject to Regulation 18 consultation between November 2022 and January 2023 which focussed on the issues facing East Hampshire District and the Council's priorities moving forward.
- 2.14 Pages 13 of the consultation document states that *"It is not just about the housing numbers; it is about providing the right homes. We need to meet the needs of our ageing population, those with disabilities, those needing different size homes or varying types of housing. East Hampshire is extremely unaffordable, so affordable housing needs are extremely important, as are the needs of traveller communities and those wishing to build their own homes."* (emphasis added).
- 2.15 Page 35 of the consultation document relates to affordable housing and states that:
- "In terms of affordable housing, analysis shows a total need for 613 affordable homes across the district per year¹. This equates to 97% of the standard method local housing need figure (632).*
- If the Council's adopted affordable housing policy at 40% was applied, overall housing need would equate to 1,535 homes per year (compared to 632) if the full extent of affordable housing need was to be met.*
- Evidence from the HEDNA 2022 confirms that both of these scenarios are unrealistic, but that it is clear that provision of new affordable housing is an important and pressing issue in the area.*
- It should be noted that the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise."* (emphasis added).
- 2.16 The Council's website explains that a further Regulation 18 consultation on a draft plan is taking place between 22 January and 4 March 2024.
- 2.17 The 'Foreword' on page 1 of the draft Local Plan states that *"This Local Plan must find land to meet the need for new homes. Housing is an important part of any thriving*

¹ Figure includes South Downs National Park – please refer to Section 3 of this Statement.

region, but it must be housing that is affordable, that is of the right size, type and tenure, and is in the right location.”

2.18 Page 25 sets out the Council’s vision *“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.”* (my emphasis).

2.19 **Policy H3 (Affordable Housing)** requires 40% affordable housing provision on major development sites. The Policy goes on to explain that 70% of the affordable units should be for rent of which 25% should be social rent; and the remaining 30% of the affordable units should be affordable homeownership products as agreed with the Council.

Emerging Bramshott and Liphook Neighbourhood Plan

2.20 Bramshott and Liphook Civil Parish carried out Regulation 14 consultation on the emerging Neighbourhood Plan (“NP”) between 28 July 2023 and 22 September 2023. The NP Steering Group are now preparing an updated version of the NP for Regulation 16 consultation.

2.21 Emerging Policy BL2 (Meeting Local Housing Needs) reflects the adopted JCS affordable housing provision (40%). Part ii of the policy states that:

“Affordable homes should be tenure-blind and well-integrated with market housing. The provision and mix of affordable units for new development must comply with the National Planning Practise Guidance on First Homes, which requires 25% of all affordable housing units to comprise of First Homes. The remaining tenure of affordable units should meet the specific needs of the Neighbourhood area, reflecting a 75 (affordable housing to rent):25 (intermediate housing for purchase) tenure split, prioritising affordable rented homes.”

2.22 Part iii then goes on to explain that:

“Proposals that enable an uplift to the discounts provided on the First Homes element of the development - up to 50% - to assist single occupants on median and lower quartile income, will be particularly supported, unless these can be demonstrated as unviable. Where proven unviable, a discount of at least 30%

should be applied. Such proposals should prioritise those with local connections to the Bramshott and Liphook parish and key workers.”

Corporate Documents

- 2.23 The Council’s corporate documents identify the delivery of affordable housing as a high corporate priority of East Hampshire District Council. These include the Homelessness and Rough Sleepers Strategy 2019-2024.

Conclusions on the Development Plan and Related Policies

- 2.24 The relevant Development Plan for East Hampshire District Council currently comprises the JCS (2014) and the Housing and Employment Allocations Plan (2016).
- 2.25 The evidence set out in this section clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within East Hampshire District.
- 2.26 The delivery of affordable homes at the site will make a significant contribution towards the annual affordable housing needs of the district, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 4 of this Statement.

Affordable Housing Needs

Section 3

The Development Plan

- 3.1 The adopted Development Plan does not define a numerical target for the provision of affordable homes. Instead, the adopted JCS seeks the provision of 40% affordable housing from qualifying developments.
- 3.2 In the absence of a defined affordable housing target figure in adopted and/or emerging policy, it is important to consider the objectively assessed need for affordable housing within the most up-to-date assessment of local housing need.

Housing Market Assessments

- 3.3 East Hampshire District Council has published two Housing Market Assessments over the course of the past five years. These are summarised in turn below.

East Hampshire Strategic Housing Market Assessment and Local Housing Requirements Study 2013

- 3.4 The East Hampshire Strategic Housing Market Assessment and Local Housing Requirements Study 2013 (“2013 SHMA”) was produced by Nathaniel Lichfield & Partners in August 2013 and forms part of the evidence base for the adopted JCS.
- 3.5 Table 22 (page 73) sets out an objectively assessed affordable housing need for **275 affordable dwellings** per annum during the JCS period between 2011/12 and 2027/28.

Housing and Economic Development Needs Assessment 2022

- 3.6 The Housing and Economic Development Needs Assessment (“2022 HEDNA”) was published in May 2022 by Icen Projects Limited and forms part of the evidence base for the emerging Local Plan 2040.
- 3.7 The Affordable Housing Need Summary table on Page 106 sets out an objectively assessed affordable housing need for 613 affordable dwellings across the JCS area between 2021/22 and 2037/38. However, this figure includes 193 affordable dwellings per annum within the South Downs National Park. As such, this equates to an affordable housing need of **420 dwellings per annum** in East Hampshire District.

Bramshott and Liphook Housing Needs Assessment 2021

- 3.8 The Bramshott and Liphook Housing Needs Assessment 2021 (“2021 BLHNA”) was published in August 2021 by AECOM. The 2021 BLHNA was published to support the emerging Bramshott and Liphook Neighbourhood Plan. The report is based on the findings of the Council’s 2019 Interim HEDNA which has since been superseded by the 2022 HEDNA.
- 3.9 Paragraph 90 of the 2021 BLHNA (page 27) explains that a figure of **50 affordable dwellings per annum between 2017/18 and 2035/36 in Bramshott and Liphook Civil Parish** is pro-rated based on the Parishes’ share of the East Hampshire District 2011 census population (7.3%).
- 3.10 Paragraph 93 (page 27) goes on to state that:
- “As we can see pro-rating District level estimates of affordable housing need to rural areas presents problems in practice. The District level figures are likely to represent higher needs in the urban areas of the District where there is a large social housing stock and larger numbers of households living in the private rented sector on housing benefit. Both of these factors tend to generate higher needs. By contrast, in rural parishes like Bramshott and Liphook the lack of social housing means there is no need generated from households already living in the sector. Similarly, households who may need social housing often move away to areas where their needs are more likely to be met (either because there is social housing available or more private rented housing). This means it is difficult to identify need for social/affordable rented housing within the NA².” (emphasis added).*
- 3.11 Paragraph 94 (page 27) then explains that there are currently 120 households on the Council’s register with a local connection to Bramshott and Liphook Civil Parish. This represents 8% of the 1,492 households on the register at the time and therefore, supports the use of the pro-rated figure of 50 affordable dwellings per annum in the Parish which was drawn from Bramshott and Liphook Civil Parishes share of the District’s population (7.3%). Furthermore, the FOI data in this Statement further supports this view as it shows 142 preferences for an affordable home in the Parish³ which equates to 9% of the register as of December 2023.

² Neighbourhood (Plan) Area

³ See paragraph 5.3 of this Statement.

- 3.12 Paragraphs 119 to 120 (page 32) recommend that any Neighbourhood Plan policies relating to affordable housing should seek higher levels of provision than the adopted JCS. However, it does accept that this approach is rarely accepted by Local Planning Authorities and further avenues for delivering greater quantities of affordable housing should be explored.

Affordable Housing Delivery

Section 4

Past Affordable Housing Delivery

- 4.1 Figure 4.1 illustrates the delivery of affordable housing (“AH”) in East Hampshire District since the start of the Joint Core Strategy period in 2011/12.

Figure 4.1: Gross Additions to Affordable Housing Stock, 2011/12 to 2022/23

Monitoring Period	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH as a %age of total completions
2011/12	328	100	30%
2012/13	332	44	13%
2013/14	354	161	45%
2014/15	537	113	21%
2015/16	397	50	13%
2016/17	475	174	37%
2017/18	884	105	12%
2018/19	1,103	557	51%
2019/20	795	237	30%
2020/21	410	69	17%
2021/22	576	87	15%
2022/23	494	111	22%
Total	6,685	1,808	27%
Avg. Pa.	557	151	

Source: DLUHC Live Tables 122 and 1008c

- 4.2 Between 2011/12 and 2022/23, a total of 6,685 dwellings were delivered in East Hampshire District, equivalent to 557 per annum. Of these, 1,808 dwellings were affordable tenures, equivalent to 151 per annum. This equates to 27% gross affordable housing delivery.

- 4.3 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy (“RtB”) sales from existing Registered Provider⁴ (“RP”) affordable housing stock.
- 4.4 Figure 4.2 below calculates the affordable housing delivery per annum since the start of the Joint Core Strategy period in 2011/12, net of Right to Buy sales. A net loss of 51 affordable dwellings over this period equates to 3% of the gross affordable housing completions of 1,808 affordable dwellings over the 12-year period.

Figure 4.2: Net of Right to Buy Additions to Affordable Housing Stock, 2011/12 to 2022/23

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	RP RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	A	B	C	D (B – C)	E (F / A) X 100
2011/12	328	100	0	100	30%
2012/13	332	44	10	34	10%
2013/14	354	161	7	154	43%
2014/15	537	113	5	108	20%
2015/16	397	50	6	44	11%
2016/17	475	174	3	171	36%
2017/18	884	105	3	102	12%
2018/19	1,103	557	3	554	50%
2019/20	795	237	3	234	29%
2020/21	410	69	3	66	16%
2021/22	576	87	5	82	14%
2022/23	494	111	3	108	22%
Total	6,685	1,808	51	1,757	26%
Avg. Pa.	557	151	4	146	

Source: DLUHC Live Tables 122 and 1008c; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2022/23).

⁴ RtB data on RP sales of affordable housing to RP tenants is contained in the annual Statistical Data Returns (“SDR”) data sets for the period 2011/12 to 2021/22 published by the Regulator of Social Housing. These figures have been combined on an annual basis to produce total Right to Buy sales.

4.5 Figure 4.2 demonstrates that on average between 2011/12 and 2022/23, the council has added 146 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 26% of the total average number of net housing completions.

Affordable Housing Compared to Affordable Housing Needs

2013 SHMA

4.6 Figure 4.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 275 net affordable dwellings per annum between 2011/12 and 2022/23, as set out in the 2013 SHMA.

Figure 4.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2013 SHMA, 2011/12 to 2022/23

Monitoring Period	Additions to AH Stock (Net of RtB)	2013 SHMA AH Needs Per Annum (Net)	Annual Shortfall / Surplus	Cumulative Shortfall / Surplus	Additions as a %age of Needs
2011/12	100	275	-175	-175	36%
2012/13	34	275	-241	-416	12%
2013/14	154	275	-121	-537	66%
2014/15	108	275	-167	-704	39%
2015/16	44	275	-231	-935	16%
2016/17	171	275	-104	-1,039	62%
2017/18	102	275	-173	-1,212	37%
2018/19	554	275	+279	-933	201%
2019/20	234	275	-41	-974	85%
2020/21	66	275	-209	-1,183	24%
2021/22	82	275	-193	-1,376	30%
2022/23	108	275	-167	-1,543	39%
Total	1,757	3,300	-1,543		53%
Avg. Pa.	146	275	-129		

Source: DLUHC Live Tables 122 and 1008c; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2022/23); and 2013 SHMA.

4.7 Since the start of the 2013 SHMA period in 2011/12 affordable housing completions (net of Right to Buy) have averaged 146 net affordable dwellings per annum, against a need of 275 net affordable dwellings per annum. A cumulative shortfall of -1,543 affordable dwellings has arisen over the 12-year period, equivalent to an average annual shortfall of -129 affordable dwellings.

2022 HEDNA

4.8 Figure 4.4 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 613 net affordable dwellings per annum between 2021/22 and 2022/23, as set out in the 2022 HEDNA.

Figure 4.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2022 HEDNA, 2021/22 to 2022/23

Monitoring Period	Additions to AH Stock (Net of RtB)	2022 HEDNA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	82	613	-531	-531	13%
2022/23	108	613	-505	-1,036	18%
Total	190	1,226	-1,036		15%
Avg. Pa.	95	613	-518		

Source: DLUHC Live Tables 122 and 1008c; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2022/23); and 2022 HEDNA.

4.9 Since the start of the 2022 HEDNA period in 2021/22 affordable housing completions (net of Right to Buy) have averaged 95 net affordable dwellings per annum, against a need of 613 net affordable dwellings per annum. A shortfall of -1,036 affordable dwellings has already arisen over the two-year period, equivalent to an average annual shortfall of -518 affordable dwellings.

Affordable Housing Delivery in Bramshott and Liphook Civil Parish

4.10 Figure 4.5 illustrates the delivery of affordable housing in Bramshott and Liphook Civil Parish since the start of the Joint Core Strategy period in 2011/12.

Figure 4.5: Gross Additions to Affordable Housing Stock in Bramshott and Liphook Civil Parish, 2011/12 to 2022/23

Monitoring Period	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH as a %age of total completions
2011/12	62	0	0%
2012/13	36	0	0%
2013/14	-1	0	0%
2014/15	33	0	0%
2015/16	48	0	0%
2016/17	40	6	15%
2017/18	83	42	51%
2018/19	55	4	7%
2019/20	46	35	76%
2020/21	26	7	27%
2021/22	50	20	40%
2022/23	44	17	39%
Total	552	131	24%
Avg. Pa.	46	11	

Source: Freedom of Information response (3 January 2024)

- 4.11 Over the 12-year period between 2011/12 and 2022/23 there have been a total of 552 net overall housing completions and 131 affordable housing completions in Bramshott and Liphook Civil Parish. Losses of existing stock through the RtB are not recorded on a parish basis. The figure given above is therefore a gross figure.
- 4.12 Affordable housing delivery in Bramshott and Liphook Civil Parish over the past 12-years should be viewed in context of the fact that as of 31 March 2022 there were 142 households on the councils housing register specifying Bramshott and Liphook Civil Parish as their preferred choice of location.
- 4.13 As outlined in Section 3 of this Statement, the 2021 BLHNA identifies a need for 50 affordable dwellings per annum between 2017/18 and 2035/36. Figure 4.6 below illustrates gross affordable housing delivery compared to the affordable housing need

of 50 net affordable dwellings per annum between 2017/18 and 2022/23, as set out in the 2021 BLHNA.

Figure 4.6: Gross Additions to Affordable Housing Stock in Bramshott and Liphook Civil Parish vs Needs Identified in the 2021 BLHNA, 2017/18 to 2022/23

Monitoring Period	Additions to AH Stock Gross	2021 BLHNA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2017/18	42	50	-8	-8	84%
2018/19	4	50	-46	-54	8%
2019/20	35	50	-15	-69	70%
2020/21	7	50	-43	-112	14%
2021/22	20	50	-30	-142	40%
2022/23	17	50	-33	-175	44%
Total	125	300	-175		42%
Avg. Pa.	21	50	-29		

Source: Freedom of Information response (3 January 2024); and 2021 BLHNA.

- 4.14 Since the start of the 2021 BLHNA period in 2017/18 affordable housing completions (gross) have averaged just 21 net affordable dwellings per annum, against a need of 50 net affordable dwellings per annum. A shortfall of -175 affordable dwellings has arisen over the six-year period, equivalent to an average annual shortfall of -29 affordable dwellings.
- 4.15 It is important to note that the above figures do not take into account sites within the Parish which benefit from planning permission but are yet to be built out. The Council's annual monitoring report does not provide this information at Parish level.
- 4.16 Alternatively, an initial review of the Council's planning search website shows just six approved applications delivering 1+ dwellings in Bramshott and Liphook Civil Parish since January 2021, of which none appear to be delivering any affordable housing.

Conclusions on Affordable Housing Delivery

- 4.17 The above evidence demonstrates that across East Hampshire District, the delivery of affordable housing has fallen persistently short of meeting identified needs.

- 4.18 In the 12-year period since the start of the Joint Core Strategy period in 2011/12, net of Right to Buy affordable housing delivery represented just 26% of overall housing delivery, equating to just 146 affordable dwellings per annum.
- 4.19 Comparative analysis of recorded affordable housing completions (net of RtB) over the 12-year period between 2011/12 and 2022/23 demonstrate a shortfall in the delivery of affordable housing of some -1,543 affordable homes against an identified need for 275 over the same period as per the 2013 SHMA.
- 4.20 Against the most recent assessment of affordable housing need, a shortfall of -1,036 affordable dwellings has arisen in the first two years of the 2022 HEDNA period between 2021/22 and 2022/23.
- 4.21 At the Parish level, a shortfall of -175 affordable dwellings has arisen in the first six-years of the 2021 BLHNA period.
- 4.22 It is clear that a 'step change' in affordable housing delivery is needed now in East Hampshire District to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 4.23 In light of the identified level of need there can be no doubt that the delivery of affordable dwellings at the site will make an important contribution to the affordable housing needs of East Hampshire District Council.

Affordability Indicators

Section 5

Market Signals

- 5.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. It is acknowledged that this is in the context of plan making.

Housing Register

- 5.2 The Council’s Freedom of Information response (**Appendix TKP1**) confirms that **on 31st March 2023 there were 1,590 households on the Housing Register**. This represents a 3% increase in a single year from 1,551 households at 31 March 2022 (which itself was a 9% increase from 1,421 households at 31 March 2021).
- 5.3 Of the 1,590 households on the Housing Register at 8 December 2023⁵, **142 households specified a preference for an affordable home in Bramshott and Liphook Civil Parish**; this represents 9% of the housing register.

Figure 5.1: Bramshott and Liphook Civil Parish Preferences as of 8 December 2023

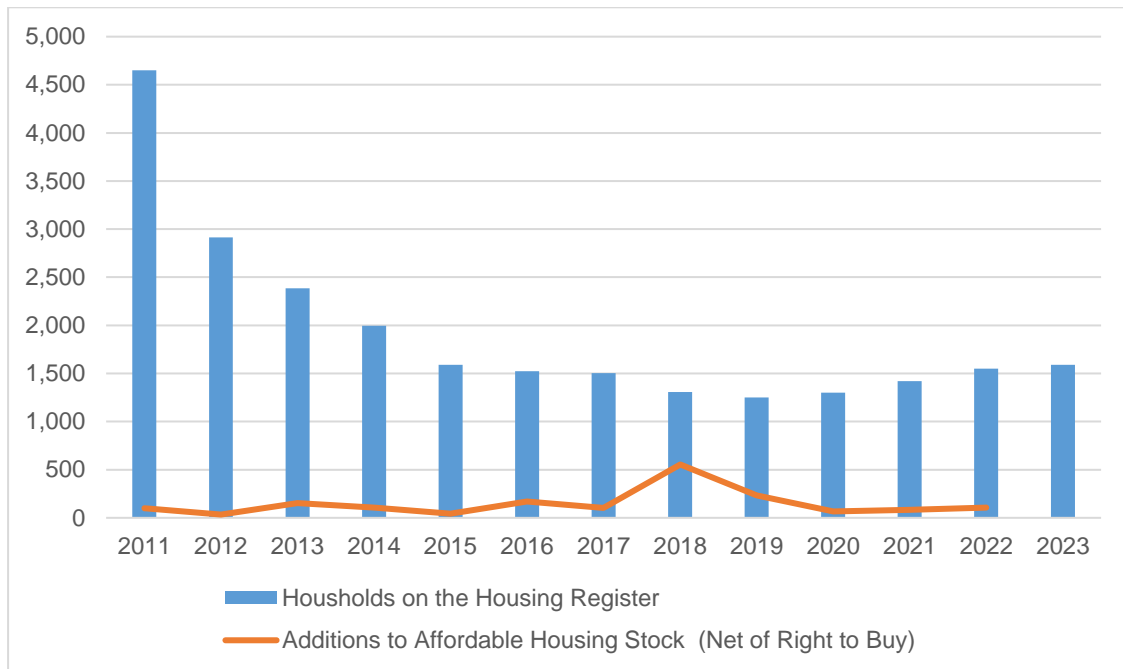
Preference	1-bed	2-bed	3-bed	4+ bed	Total
1 st preference area	20	22	2	1	45
2 nd preference area	9	12	6	7	34
3 rd preference area	36	16	8	3	63
Total	65	50	16	11	142

Source: Freedom of Information response (3 January 2024)

- 5.4 Figure 5.2 provides a comparative analysis of the number of households on the Housing Register and affordable housing delivery (net of Right to Buy) across East Hampshire District since the start of the JCS period in 2011/12. It shows that the Housing Register is now at its highest level in the last nine years.

⁵ The Council’s FOI response explains that this data cannot be provided retrospectively.

Figure 5.2: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2011 to 2023



Source: Freedom of Information response (3 January 2024); DLUHC Live Tables 122, 600, 1008c; and Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2011/12 to 2022/23).

Note: completions figures are not yet available for the 2022/2023 monitoring period.

5.5 As Figure 5.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in East Hampshire District since 2011/12.

5.6 Footnote 4 of DLUHC⁶ Live Table 600 highlights that:

“The Localism Act 2011, which came into force in 2012, gave local authorities the power to set their own qualification criteria determining who may or may not go onto the housing waiting list. Previously, local authorities were only able to exclude from their waiting list people deemed guilty of serious unacceptable behaviour. The Localism Act changes have contributed to the decrease in the number of households on waiting lists since 2012” (emphasis added).

5.7 Evidently the result of the Localism Act is that many local authorities, including East Hampshire District Council, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.

⁶ Department for Levelling Up, Housing and Communities

- 5.8 Following the 2012 changes brought about by the Localism Act, East Hampshire District Council published a revised Housing Allocations Scheme which received further revisions in **2015, 2017, 2018, 2019, 2020, 2021, 2022 and 2023**.
- 5.9 Despite this it is important to reiterate that the number of households on the Housing Register has actually increased by 3% in the past 12-months, indicating a worsening of affordability across East Hampshire District.
- 5.10 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.
- 5.11 It may also have other negative impacts when you consider that those who are excluded from the register may be forced to move away from East Hampshire District to cheaper more affordable areas but due to their connections to the area, they still have to commute back into the area to visit friends, family, and travel to their place of work.
- 5.12 One clear impact of this is that such an eventuality would generate extra traffic which brings in to question the sustainability of such an approach.
- 5.13 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester⁷ in August 2017. In assessing the need for affordable housing in the district, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 of their report that:

“The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, I attach substantial weight to this element of the proposal” (emphasis added).

⁷ Appeal reference: 3165228

5.14 Furthermore, in the appeal decision at Oxford Brookes University Campus at Wheatley⁸, Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:

“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses” (emphasis added).

5.15 The Inspector went on to state at paragraph 13.102 that:

“Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list” before concluding that “Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”.

5.16 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

“The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight”.

5.17 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery. In my opinion the numbers on East Hampshire District Council’s housing register remains high.

5.18 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. affordable rented, starter homes, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

⁸ SoS decision reference: 3230827

- 5.19 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, TKP suggest, the Government intends to assist by increasing the range of affordable housing types in the most recent NPPF (2023).
- 5.20 The Franklands Drive Secretary of State appeal decision in 2006⁹ underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 of the Inspector's report the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.
- 5.21 As such the number of households on the Housing register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

Waiting Times

- 5.22 In addition, the wait to be housed in an affordable home for applicants within Band 2 which ranges from 6 months for a 2-bed affordable flat through to 3 years and 2 months for a 4-bed+ affordable home.
- 5.23 Figure 5.3 also shows the wait to be housed in an affordable home for applicants within Band 3 which ranges from 1 year and 6 months for a 2-bedroom affordable flat to 4 years for a 4+ bedroom affordable home.
- 5.24 The waiting times for all affordable property sizes is set out at Figure 5.3 below and presents further stark evidence of a deteriorating affordable housing crisis afflicting East Hampshire District.

⁹ SoS decision reference: 1198326

Figure 5.3: Housing Register Average Waiting Times, March 2022 to March 2023

Size of Affordable Property	Band 2	Band 3	Band 4
1-bedroom home	1 year, 7 months	2 years, 9 months	n/a
2-bedroom flat	6 months	1 year, 6 months	n/a
2-bedroom house	2 years	3 years, 4 months	n/a
3-bedroom home	2 years	4 years	n/a
4+ bedroom home	3 years, 2 months	n/a	n/a

Source: Freedom of Information response (3 January 2024)

Housing Register Bids and Lettings

- 5.25 Figure 5.4 below demonstrates average number of bids per property in Bramshott and Liphook Civil Parish over the 2022/23 monitoring period for a range of types of affordable property.

Figure 5.4: Bids Per Property in Bramshott and Liphook Civil Parish, March 2022 to March 2023

Type of affordable property	Bramshott and Liphook Civil Parish	
	Number of properties advertised	Average bids per property
1-bed affordable dwelling	16	51
2-bed affordable dwelling	9	62
3-bed affordable dwelling	4	50
4+ bed affordable dwelling	0	n/a

Source: Freedom of Information response (3 January 2024)

- 5.26 Figure 5.4 demonstrates that between 1 April 2022 to 31 March 2023 there were an average of 51 bids per 1-bed affordable dwelling put up for let in the parish, 62 average bids per 2-bed affordable dwelling and 50 average bids per 3-bed affordable dwelling. No 4+ bed affordable dwellings were let over the period in the parish.
- 5.27 This should be viewed in context of the fact that the FOI response also highlights that over the 2022/23 monitoring period there were just 29 social housing lettings in Bramshott and Liphook Civil Parish
- 5.28 For every successful letting, there are clearly many other households who have missed out and are left waiting for an affordable home. Evidently there is a clear and pressing need for affordable homes within the Bramshott and Liphook area which is not being met.

Help to Buy Register

- 5.29 Further evidence in respect of the need across East Hampshire District for affordable housing is provided in information from Help to Buy South.
- 5.30 Help to Buy South was one of three agents appointed by the Government to help provide Help to Buy schemes across England. Households who were seeking shared ownership homes are required to register with Help to Buy South so that they may apply for properties.
- 5.31 The Help to Buy Register provides details of those seeking shared-ownership accommodation in the South of England. This demonstrates that as of 27 March 2023, 757 households were seeking a shared ownership home in East Hampshire District. This is clearly a significant proportion of those seeking assistance with their housing.

Temporary Accommodation

- 5.32 DLUHC data details that 76 households were housed in temporary accommodation within the East Hampshire District area on 31 March 2023. East Hampshire District Council has a responsibility to house these households.
- 5.33 DLUHC data shows that of the 76 households in temporary accommodation, 12 households have been living in temporary accommodation for less than 6 months, 1 household for 1-2 years and 53 households have been living in temporary accommodation for 5+ years.
- 5.34 The *“Bleak Houses: Tackling the Crisis of Family Homelessness in England”* report published in August 2019 by the Children’s Commissioner found that temporary accommodation presents serious risks to children’s health, wellbeing, and safety; particularly for families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour or those with substance abuse issues.
- 5.35 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a *“significant impact on many aspects of their lives”*.

Homelessness

- 5.36 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2021 and 31 March 2022, the Council accepted 362 households in need of

homelessness prevention duty¹⁰, and a further 75 households in need of relief duty¹¹ from the Council.

5.37 Furthermore a 2017 report by the National Audit Office (“NAO”) found that:

“The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England. The proportion of households accepted as homeless by local authorities due to the end of an assured shorthold tenancy increased from 11% during 2009-10 to 32% during 2016-17. The proportion in London increased during the same period from 10% to 39%. Across England, the ending of private sector tenancies accounts for 74% of the growth in households who qualify for temporary accommodation since 2009-10. Before this increase, homelessness was driven by other causes. These included more personal factors, such as relationship breakdown and parents no longer being willing or able to house children in their own homes. The end of an assured shorthold tenancy is the defining characteristic of the increase in homelessness that has occurred since 2010.” (Emphasis in original).

5.38 The NAO report also noted that *“The affordability of tenancies is likely to have contributed to the increase in homelessness”* and that *“Changes to Local Housing Allowance are likely to have contributed to the affordability of tenancies for those on benefits and are an element of the increase in homelessness.”*

Lower Quartile Private Rental Market

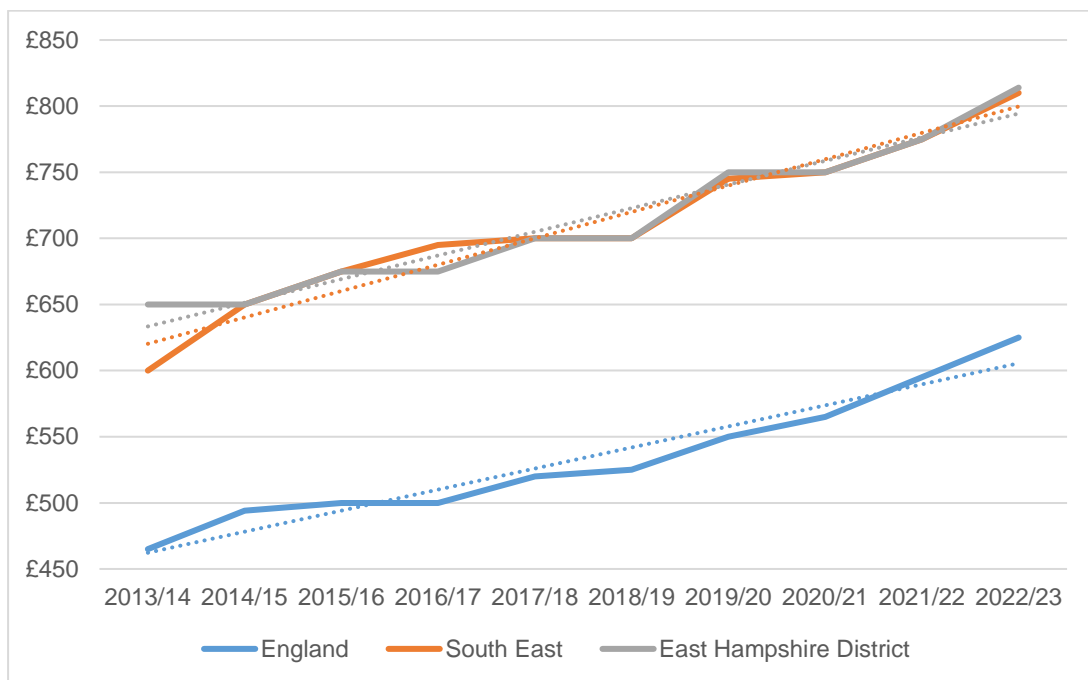
5.39 Lower quartile private sector rents are representative of the ‘entry level’ of the private rented sector and include dwellings sought by households on lower incomes.

5.40 Valuation Office Agency (“VOA”) and Office for National Statistics (“ONS”) data (first produced in 2013/14) show that the average lower quartile monthly rent in East Hampshire District in 2022/23 was £814 pcm. This represents a 25% increase from 2013/14 where average lower quartile monthly rents stood at £650 pcm.

¹⁰ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

¹¹ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.

Figure 5.5: Lower Quartile Private Sector Rents, 2013/14 to 2022/23



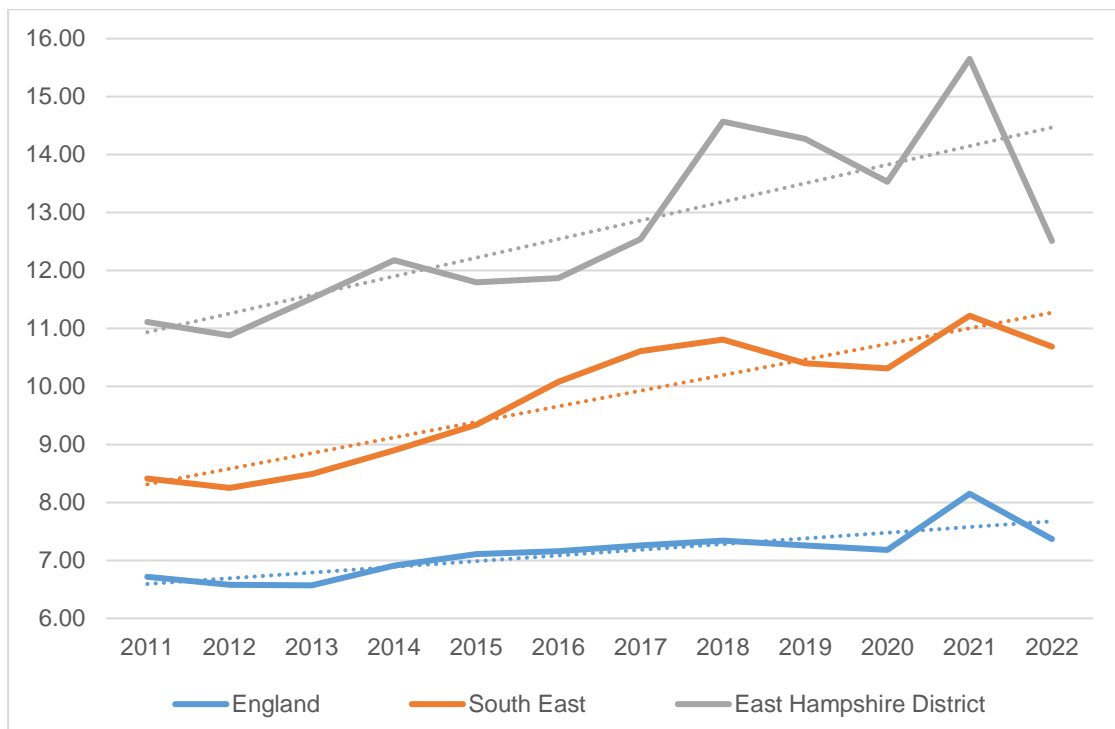
Source: VOA and ONS Private Rental Market Statistics

- 5.41 A lower quartile rent of £814 pcm in 2022/23 is slightly higher than the South East figure of £810 pcm and 30% higher than the national figure of £625 pcm.

Lower Quartile House Prices

- 5.42 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), **the ratio of lower quartile house price to incomes in East Hampshire District now stands at 12.51**, a 12% increase since the start of the JCS period in 2011 where it stood at 11.11.
- 5.43 The ratio of lower quartile house price to incomes in East Hampshire District stands significantly above the national average 7.37 (+70%) and above the South East average of 10.69 (+17%).

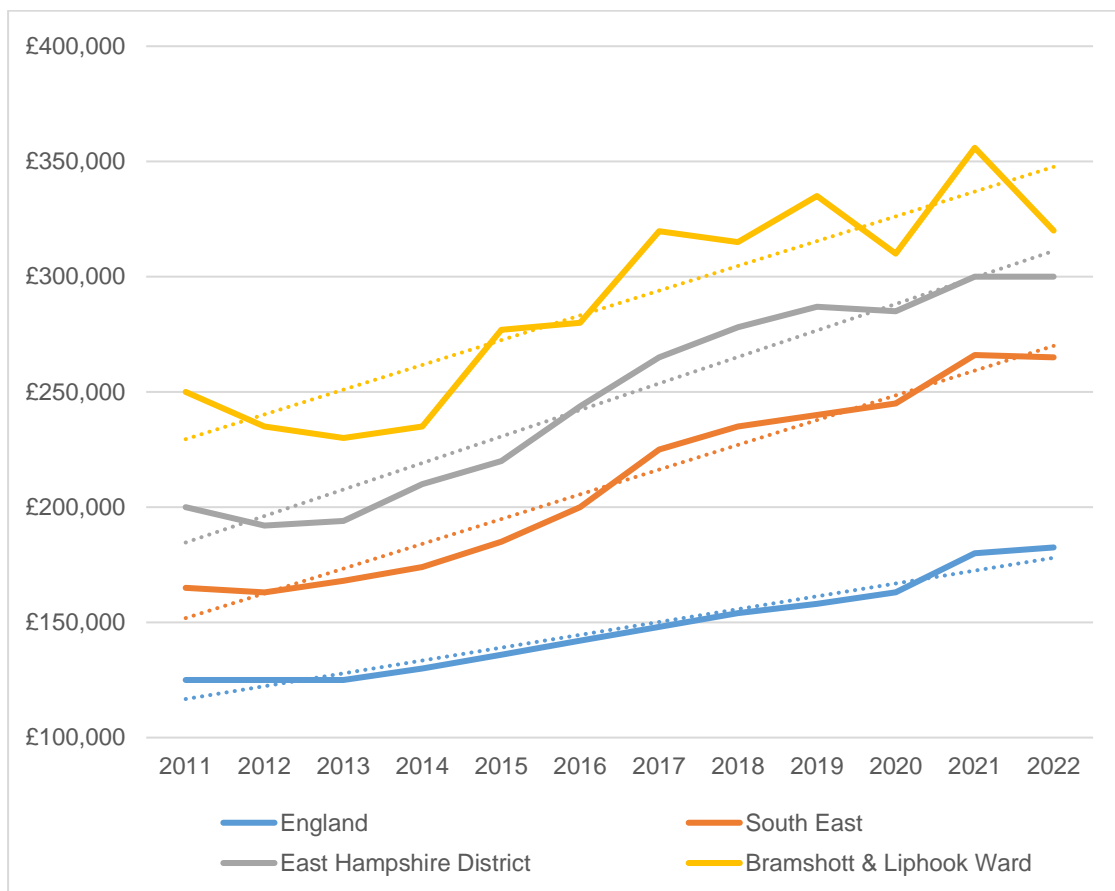
Figure 5.6: Lower Quartile Workplace-Based Affordability Ratio comparison, 2011 to 2022



Source: ONS Ratio of House Price to Work-place Based Earnings

- 5.44 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 178% higher than that.
- 5.45 Figure 5.7 illustrates the lower quartile house sale prices for England, the South East, East Hampshire District and Bramshott and Liphook Ward. It demonstrates that they have increased dramatically between the start of the JCS period in 2011 and 2022.
- 5.46 Please note that lower quartile house price data at Ward level has not been published for 2023. As such, for consistency we have compared the 2022 Ward figures with 2022 data for East Hampshire District, the South East and England.
- 5.47 In 2022 lower quartile house prices in Bramshott and Liphook Ward (£320,000) were 7% higher than across East Hampshire District (£300,000), 21% higher than across the South East (£265,000) and 75% higher than the national figure (£182,500).

Figure 5.7: Lower Quartile House Prices, 2011 to 2022



Source: ONS HPSSA Datasets

- 5.48 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire¹² in January 2022. In considering the provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

“78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and C would offer affordable housing products as defined by national and local planning policy. I do not diminish the weight to be provided to this provision because such housing might be even cheaper in a theoretical location elsewhere. In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products.”

¹² Appeal reference: 3278256

79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. I therefore place **substantial positive weight** on the proposed provision of affordable housing in Appeals A and C. The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard” (emphasis added).

Conclusions on Affordability Indicators

- 5.49 As demonstrated through the analysis in this section, affordability across East Hampshire District has been, and continues to be, in crisis.
- 5.50 House prices and rent levels in lower quartile segment of the market are higher than the South East and national averages, whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in East Hampshire District out of the reach of more and more people.
- 5.51 Analysis of market signals is critical in understanding the affordability of housing. In the opinion of Tetlow King Planning, there is an acute housing crisis in East Hampshire District, with a lower quartile house price to average income ratio of 12.51.
- 5.52 Market signals indicate a worsening trend in affordability in East Hampshire District and within Bramshott and Liphook Ward. By any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Conclusions and Recommendations

Section 6

Policy Position

- 6.1 The relevant Development Plan in respect of affordable housing for this site comprises the Joint Core Strategy (2014) and the Housing and Employment Allocations Plan (2016).
- 6.2 This Statement clearly highlights that within adopted policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key priority for East Hampshire District Council.

Affordable Housing Needs

- 6.3 The 2013 SHMA sets out an objectively assessed affordable housing need for 275 affordable dwellings per annum during the JCS period between 2011/12 and 2027/28.
- 6.4 The 2022 HEDNA identifies a need for 613 affordable dwellings across the JCS area between 2021/22 and 2037/38. However, this figure includes 193 affordable dwellings per annum within the South Downs National Park. As such, this equates to an affordable housing need of 420 dwellings per annum in East Hampshire District.
- 6.5 The 2021 BLHNA identifies a need for 50 affordable dwellings per annum within the Bramshott and Liphook NP area between 2017/18 and 2035/36.

Affordable Housing Delivery

- 6.6 Comparative analysis of recorded affordable housing completions (net of RtB) over the 12-year period between 2011/12 and 2022/23 demonstrate a shortfall in the delivery of affordable housing of some -1,543 affordable homes against an identified need for 275 over the same period as per the 2013 SHMA.
- 6.7 Against the most recent assessment of affordable housing need, a shortfall of -1,036 affordable dwellings has arisen in the first two years of the 2022 HEDNA period between 2021/22 and 2022/23.
- 6.8 At Parish level, a shortfall of -175 affordable dwellings has arisen in the first six-years of the 2021 BLHNA period.

6.9 Given the recognised shortfall in affordable housing across East Hampshire District, the site will provide an affordable housing contribution which would contribute significantly towards addressing this key corporate priority.

Affordability

6.10 In addition to the current shortfalls in delivery against the objectively assessed need for affordable housing identified in both the 2013 SHMA and 2022 HEDNA, other indicators further point to an affordability crisis in East Hampshire District.

6.11 Set out below are the key findings in respect of affordability across East Hampshire District:

Housing Needs

- As at 31st March 2022 there were 1,590 households on the Housing Register.
- Of the 1,590 households on the Housing Register at 8 December 2023¹³, 142 households specified a preference for an affordable home in Bramshott and Liphook Civil Parish; this represents 9% of the housing register.
- Between 1 April 2022 to 31 March 2023 there were an average of 51 bids per 1-bed affordable dwelling put up for let in the parish, 62 average bids per 2-bed affordable dwelling and 50 average bids per 3-bed affordable dwelling. No 4+ bed affordable dwellings were let over the period in the parish.
- This should be viewed in context of the fact that the FOI response also highlights that over the 2022/23 monitoring period there were just 29 social housing lettings in Bramshott and Liphook Civil Parish
- The Help to Buy Register provides details of those seeking shared-ownership accommodation in the South of England. This demonstrates that as of 27 March 2023, 757 households were seeking a shared ownership home in East Hampshire District. This is clearly a significant proportion of those seeking assistance with their housing.
- DLUHC data FOI response details that 76 households were housed in temporary accommodation within the East Hampshire District region at 31 March 2023. East Hampshire District Council has a responsibility to house these households.

¹³ The Council's FOI response explains that this data cannot be provided retrospectively.

- DLUHC data shows that of the 76 households in temporary accommodation, 12 households have been living in temporary accommodation for less than 6 months, 1 household for 1-2 years and 53 households have been living in temporary accommodation for 5+ years.
- DLUHC statutory homelessness data shows that in the 12 months between 1 April 2021 and 31 March 2022, the Council accepted 362 households in need of homelessness prevention duty, and a further 75 households in need of relief duty from the Council.

Lower Quartile Private Rents

- A lower quartile rent of £814 pcm in 2022/23 is slightly higher than the South East figure of £810 pcm and 30% higher than the national figure of £625 pcm.

Lower Quartile House Prices

- The ratio of lower quartile house price to incomes in East Hampshire District of **12.51** stands significantly above the national lower quartile ratio of 7.37 (+70%) and above the South East lower quartile ratio of 10.69 (+17%).
- In 2022 lower quartile house prices in Bramshott and Liphook Ward (£320,000) were 7% higher than across East Hampshire District (£300,000), 21% higher than across the South East (£265,000) and 75% higher than the national figure (£182,500).

6.12 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Bramshott and Liphook Civil Parish as well as across East Hampshire District more generally.

6.13 This demonstrates an acute need for affordable housing in East Hampshire District and one which the Council and decision takers need to do as much as possible to seek to address as required to do so, proactively, by the NPPF (2023).

Conclusions

6.14 There are serious and persistent affordability challenges across East Hampshire District. This is exemplified by the affordability indicators which show a poor and worsening affordability across East Hampshire District.

6.15 It is the opinion of Tetlow King Planning that there is an acute housing crisis in East Hampshire District, with lower quartile house price to income ratio of 12.51. Mortgage

lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 178% higher than that and rising.

- 6.16 Boosting the supply of affordable homes will mean that households needing affordable housing will spend less time on the waiting list and in unsuitable accommodation. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.
- 6.17 The affordable housing benefits the site can deliver are therefore:
- Policy compliant 40% of the scheme provided as affordable housing;
 - A deliverable scheme which provides much needed affordable homes;
 - In a sustainable location;
 - With the affordable homes managed by a Registered Provider;
 - Which provide better quality affordable homes; and
 - Greater security of tenure than the private rented sector.
- 6.18 Evidently, there can be no doubt that the provision of affordable dwellings on this site to help those in acute need in East Hampshire District should be afforded **substantial weight**.

Appendix TKP1

Freedom of Information correspondence (4 December 2023 & 3 January 2024)



[REDACTED]

From: [REDACTED]
Sent: 01 February 2024 08:18
To: [REDACTED]
Subject: FW: Resolution of your Information Request Report REF-178449-N5M4
Attachments: Version 11 - HHC Allocation Framework master Nov 2015 DO NOT USE.pdf; Version 12 - HHC Allocation Framework master Dec 2015 DO NOT USE.pdf; Version 13 - HHC Allocation Framework master Sep 2017 DO NOT USE.pdf; Version 14 - HHC Allocation Framework master Apr 2018 DO NOT USE.pdf; Version 15 - HHC Allocation Framework master May 2019 DO NOT USE.pdf; Version 16 - HHC Allocation Framework master July 2020 DO NOT USE.pdf; Version 17 - HHC Allocation Framework master 20.01.2021 DO NOT USE.pdf; Version 18 - HHC Allocation Framework master 29.04.2021 DO NOT USE.pdf; Version 19 - HHC Allocation Framework master 01.06.2021 DO NOT USE.pdf; Version 20 - HHC Allocation Framework master 29.10.2021 DO NOT USE.pdf; Version 21 - HHC Allocation Framework master 09.08.2022 DO NOT USE.pdf; Version 22 - HHC Allocation Framework master 26.08.2022 DO NOT USE.pdf; Version 23 - HHC Allocation Framework master 20.10.2023 - CURRENT (1).pdf

From: InfoRequests East Hants <Info-Requests@easthants.gov.uk>
Sent: Wednesday, January 3, 2024 11:37 AM
To: [REDACTED]
Subject: Resolution of your Information Request Report REF-178449-N5M4

Dear [REDACTED]

Freedom of Information request

Thank you for your recent communication which is being managed in line with the Freedom of Information Act under the above reference number. The details of your request are outlined below together with the council's response.

Your Request and Our Response

Questions 1 to 11 of this request relate to data held by the Housing Department.

Questions 12 to 15 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2023.

The total number of households on the Council's Housing Register at 31 March 2023. 1,590

2. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

- a 1-bed affordable dwelling;
- b 2-bed affordable dwelling;
- c 3-bed affordable dwelling; and
- d A 4+ bed affordable dwelling.

Average waiting times for applicants housed in East Hampshire between 1 April 2022 and 31 March 2023.

	Band 2	Band 3	Band 4
1 bed	1 year 7 months	2 years 9 months	N/A
2 bed flat	6 months	1 year 6 months	N/A
2 bed house	2 years	3 years 4 months	N/A

3 bed	2 years	4 years	N/A
4+ bed	3 years 2 months	N/A	N/A

3. The average waiting times at 31 March 2022 for the following types of affordable property across the Authority:

- a 1-bed affordable dwelling;
- b 2-bed affordable dwelling;
- c 3-bed affordable dwelling; and
- d A 4+ bed affordable dwelling.

Average waiting times for applicants housed in East Hampshire between 1 April 2021 and 31 March 2022.

	Band 2	Band 3	Band 4
1 bed	10 months	2 years 1 month	N/A
2 bed flat	8 months	1 year 6 months	N/A
2 bed house	2 years 8 months	3 years	N/A
3 bed	1 year 9 months	4 years 8 months	N/A
4+ bed	3 years 11 months	N/A	N/A

4. The total number of households on the Council's Housing Register at 31 March 2023 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2023)
Bramshott and Liphook Civil Parish	

Unfortunately, we are not able to retrospectively identify the number of applicants who had indicated Bramshott and Liphook as a preference area. We can provide this information as of today (8 December 2023).

As of 8 December 2023, 45 households have indicated on their application their first preference area is: Bramshott and Liphook

1 Bed	2 Bed	3 Bed	4+ Bed	Total
20	22	2	1	45

As of 8 December 2023, 34 households have indicated on their application their second preference area is: Bramshott and Liphook

1 Bed	2 Bed	3 Bed	4+ Bed	Total
9	12	6	7	34

As of 8 December 2023, 34 households have indicated on their application their third preference area is: Bramshott and Liphook

1 Bed	2 Bed	3 Bed	4+ Bed	Total

36	16	8	3	63
----	----	---	---	----

5. The number of properties advertised, and the average number of bids per property over the 2022/23 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Bramshott and Liphook Civil Parish	
	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling	16	51
2-bed affordable dwelling	9	62
3-bed affordable dwelling	4	50
4+ bed affordable dwelling	0	N/A

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

- The date they occurred;
- What they entailed; and
- Copies of the respective documents

The Hampshire Home Choice (HHC) Allocations Framework was reviewed in 2012 and the existing Qualification criteria was introduced in 2013. The HHC Framework is due to be reviewed in 2023. Since 2013 there have been amendments to the HHC Framework to meet the introduction of Legislation, Regulations and Guidance:

- **Allocation of Accommodation: Guidance for Local housing Authorities in England (2020, MHCLG) “the Code”.**
- **Providing social housing for local people: Statutory Guidance on social housing allocations for local authorities in England (DCLG, December**

2013) “Supplementary Code”.

- **Improving Access to Social Housing for Victims of Domestic Abuse in Refuges or Other Types of Temporary Accommodation: Statutory guidance on social housing allocations for local authorities in England (MHCLG, November 2019) “Supplementary Code”.**
 - **Improving access to social housing for members of the Armed Forces (MHCLG, 27 June 2020) “Supplementary Code”.**
 - **Homelessness Reduction Act 2017.**
 - **Domestic Abuse Act 2021**
 - **The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) (No. 2) Regulations 2018 (SI 2018/1056).**
 - **Allocation of Housing (Qualification Criteria for Armed Forces)(England) Regulations 2012, SI 2012/1869.**
 - **Housing Act 1996 (Additional Preference for Armed forces) (England) Regulations 2012, SI 2012/2989.**
 - **Allocation for Housing (Qualification Criteria for Right to Move) (England) Regulations 2015, SI 2015/967.**
-
- **The Data Protection Act 2018 and General Data Protection Regulation (GDPR)**

The HHC Framework has also been updated to reflect minor amendments to existing wording, Council’s brand/Logo changes.

Please find details of changes made to the HHC Allocations Framework which were not as a result of the above:

Version 21 dated 9 August 2022

- **A maximum savings/asset threshold in relation to applicants with savings/assets and/or who own a property was introduced.**

Version 17 dated 20 January 2021

- **The HHC Framework, Operational Procedures and Management Moves Policies were combined into one document (The HHC Framework).**

Version 16 dated 14 July 2020

- **The Suspension Policy in relation to rent arrears and the Priority Date assessment was amended.**
- **There was a minor amendment to the Health and Welfare Assessment process.**

Version 13 dated 27 September 2017

- Introduced the ability to apply flexibility when allocating adapted properties in villages which are not subject to a S106 preference cascade for the allocation of the property.
- Introduced an additional housing need category which allowed social housing tenants living in a bedsit/studio flat (in the East Hampshire, Eastleigh, Havant, Test Valley, and Winchester Council areas) for a period of 2 years; to qualify to be considered for one bedroom accommodation.

Versions 11 – 23 of the HHC Framework are available and have been attached. Previous versions are no longer available as these have been removed from our system in accordance with the retention schedule for the removal of documents.

Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2023 in the following locations:

Location	Total Social Housing Stock (31 March 2023)
Bramshott and Liphook Civil Parish	

Housing & Employment Development Needs Assessment (HEDNA – May 2020) was carried out in 2020 to support the development of the local plan and the data below was reported from the Regulator of Social Housing in 2020

We do not hold data specific to Bramshott and Liphook Civil Parish

East Hampshire

General Needs Rented 5,807

LCHO (Shared Ownership / Equity) 697

Supported Housing 123

Housing for Older People 785

Total 7,412

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2021 and 31 March 2022; and between 1 April 2022 and 31 March 2023 in the following locations:

Location	Social Housing Lettings	
	1 April 2021 to 31 March 2022	1 April 2022 to 31 March 2023
Bramshott and Liphook Civil Parish		

29 properties were advertised and let in Bramshott and Liphook between 1 April 2022 and 31 March 2023.

- 1 bed = 16
- 2 Bed = 9
- 3 Bed = 4
- 4 Bed = 0

31 properties were advertised and let in Bramshott and Liphook between 1 April 2021 and 31 March 2022.

- 1 bed = 13
- 2 Bed = 12
- 3 Bed = 3
- 4 Bed = 3

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the East Hampshire District Council region on the following dates:

Households in Temporary Accommodation	31 March 2022	31 March 2023
Households Housed within East Hampshire District Council		
Households Housed outside East Hampshire District Council		
Total Households		

31 March 2022 3 households were placed in East Hants in emergency placements with private providers

In addition East Hampshire had nomination rights to 193 temporary accommodation units with various housing associations. No data is available as to occupation dates to confirm the number occupied on this date.

10. The amount of money spent on temporary accommodation per household within the East Hampshire District Council region over the following periods:

- 1 April 2022 to 31 March 2023.

The total amount spent on emergency accommodation in 2022/23 £253,115.24. We are unable to provide a breakdown of expenditure by location.

11. The amount of money spent on temporary accommodation per household outside the East Hampshire District Council region over the following periods:

- 1 April 2022 to 31 March 2023.

The total amount spent on emergency accommodation in 2022/23 £253,115.24. We are unable to provide a breakdown of expenditure by location.

Housing Completions

12. The number of NET housing completions in the East Hampshire District Council region broken down on a per annum basis for the period between 2000/01 and 2022/23.

Monitoring Year	NET housing completions
2011/12	214
2012/13	201
2013/14	216
2014/15	389
2015/16	350
2016/17	310
2017/18	576
2018/19	689
2019/20	418
2020/21	275
2021/22	336
2022/23	319

13. The number of NET affordable housing completions in the East Hampshire District Council region broken down on a per annum basis for the period between 2000/01 and 2022/23.

Monitoring Year	NET affordable housing completions
2011/12	50
2012/13	78
2013/14	109
2014/15	96
2015/16	54
2016/17	114
2017/18	216
2018/19	259
2019/20	208
2020/21	91

2021/22	159
2022/23	134

14. The number of NET housing completions in Bramshott and Liphook Civil Parish broken down on a per annum basis for the period between 2000/01 and 2022/23.

Monitoring Year	NET housing completions
2011/12	62
2012/13	36
2013/14	-1
2014/15	33
2015/16	48
2016/17	40
2017/18	83
2018/19	55
2019/20	46
2020/21	26
2021/22	50
2022/23	44

15. The number of NET affordable housing completions in Bramshott and Liphook Civil Parish broken down on a per annum basis for the period between 2000/01 and 2022/23.

Monitoring Year	NET affordable housing completions
2011/12	0
2012/13	0
2013/14	0
2014/15	0
2015/16	0
2016/17	6
2017/18	42
2018/19	4
2019/20	35

2020/21	7
2021/22	20
2022/23	17

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: <ul style="list-style-type: none"> a. Affordable housing for rent b. Starter Homes c. Discounted market sales housing; and d. Other affordable routes to home ownership.[1]
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

[1] As defined by Annex 2 of the National Planning Policy Framework (2021) which can be viewed [here](#).

Please accept this email as completion of your request.

The information contained in this response is released under an Open Government Licence, for more information please visit the Councils website: <https://www.easthants.gov.uk/re-use-public-sector-information-complaints-procedure>

If you are dissatisfied with the outcome of your request, please contact our Information Governance Department on info-requests@easthants.gov.uk and we will conduct an internal review. Please do not reply to this email as it is an unmonitored email address. Upon review, if you are still dissatisfied, you may appeal our decision by contacting the Information Commissioner's Office; for more information please visit the ICO's website.

Please be aware, if we do not receive an appeal within 40 days of you receiving this letter we will assume that you are satisfied with our response. If you wish to make any further requests for information please do not hesitate to contact us on info-requests@easthants.gov.uk.

Kind regards

Information Governance Officer

East Hampshire District Council

Penns Place

Petersfield GU31 4EX

www.easthants.gov.uk

www.facebook.com/easthampshiredistrictcouncil

www.twitter.com/easthantsdc

Your privacy matters, go to: www.easthants.gov.uk/privacy-policy

██████████ Leevan Ltd Comment on the Draft Local Plan - Allocated sites in Four Marks

Sat 02/03/2024 10:33

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

 10 attachments (3 MB)

Leevan Ltd Land Availability Assessment Site Submission Form for Land Rear of 87 Lymington Bottom 020324.pdf; Leevan Ltd Land Availability Assessment Site Submission Supporting Document 020324.pdf; ██████████ Leevan Ltd 020324.pdf; OCEs HP375430 dated 7.5.21.pdf; Official Copy of Register - EDOC REGISTRATION - SH55437.pdf; SH55437_Official Copy of Title Plan - EDOC REGISTRATION.pdf; Site Location Plan.pdf; Title Plan HP375430 7.5.21.pdf; 26 May 2021 LAA Suggestion Form.pdf; 26 May 2021 LAA Supporting Report .pdf;

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

We are writing in response to East Hampshire District Council's Draft Local Plan 2021 - 2040 Consultation (22nd January - 4th March 2024) to comment on the draft local plan and in particular to comment on sites to be allocated in Four Marks.

Leevan Ltd have submitted a Land Availability Assessment Site Submission for the land to the rear of 87 Lymington Bottom, Four Marks (the proposed site), and propose that the site be allocated for new development in the final version of the Local Plan. The submission is included below for your reference.

The site provides an opportunity to meet local housing needs including over 90% smaller homes to meet demographic trends including provision for single story dwellings suitable for older and disabled people and provide for employment and community uses (if required) as well as new public open green space and new pedestrian/cycle routes to improve connectivity and significantly improve sustainable transport provision in Four Marks.

We believe that the proposed site to the rear of 87 Lymington Bottom, Four Marks, should be allocated in the final version of the Local Plan for the reasons set out in the supporting document attached to the e mail below.

This document provides an update on the current status of the proposed site and supporting information that demonstrates that the proposed site is worthy of being allocated in the final version of the Local Plan.

On behalf of Leevan Ltd
██████████

From ██████████

Sent: Saturday, March 2, 2024 9:27 PM

To: 'localplan@easthants.gov.uk' <localplan@easthants.gov.uk>

Subject: Land Availability Assessment Site Submission for land to the rear of 87 Lymington Bottom, Four Marks.

Please find attached a Land Availability Assessment Site Submission for land to the rear of 87 Lymington Bottom, Four Marks.

The submission includes:

- The completed Land Availability Assessment Site Submission form
- Site Location Plan
- Title documents and title plans
- Letters from ██████████ and Leevan Ltd

- a supporting document prepared by Leevan Ltd

The documents forming the appendices to the supporting document prepared by Leevan Ltd can be accessed as detailed below:

Appendix A : Site location form – this is the site location form attached to this e mail

Appendix B : Land Availability Assessment Site Submission Form (prepared by Fredrick Adam, dated 26th May 2021) – see documents attached

Appendix C: Supporting Report (prepared by Fredrick Adam, dated 26th May 2021) – see documents attached

Appendix D : Land Availability Assessment Site Submission Form (prepared by Leevan, dated 2nd March 2024) – this is the form submitted and attached to this e mail

The documents referred to in the supporting document can be accessed from the link below:

[REDACTED]

Best regards

[REDACTED]

East Hampshire District Council Land Availability Assessment / Brownfield Land Register Site Submission Form

- This form can be completed electronically
- Please complete a separate form for each site you wish to promote.
- You must complete the form in full
- You must attach an OS base map showing the precise boundaries of the site
- 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 they are content for the site to be promoted.

This form should be returned to East Hampshire District Council using the details provided at the end of this form.

Your details	
Name	[REDACTED]
Company / Agent	Fredrick Adam Ltd
Representing	[REDACTED]
Contact Address	% Fredrick Adam Ltd, Lymington Farm Industrial Estate, Lymington Bottom Road, Medstead, GU34 5EW
Contact Telephone No.	[REDACTED]
E-mail	[REDACTED]

Site details
<p>Full address of site (this must be accompanied by a map showing the site boundary). <u>Without this mapped information we are unable to register the site.</u></p> <p>Number 87 Lymington Bottom, Four Marks, Alton, Hampshire, GU34 5AH</p>
<p>Site area:</p> <p>11.221 acres</p>

Landowner details (Please note: you must submit 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 attach a letter from the land owner confirming that they are content for the site to be promoted.

Please see attached title references: HP375430 and SH55437 and letters from [REDACTED].


Current and Potential use

Current land use and description (e.g. previously developed land, greenfield)
 Part residential (within the defined Settlement Policy Boundary (SPB) (policy CP10), and part agricultural (policy CP19)

Condition of current use (e.g. vacant, derelict, poor quality)
 Residential garden land (reasonable quality) and vacant agricultural land.

Relevant planning history of site (please provide planning application numbers if available)
 A review of the on-line planning history for the property confirms the following:
 LPA Ref: 26164/004: single storey rear extension and rear porch/covered way. Approved in December 1998.

Proposed land use	Please tick	Potential capacity of site for specific uses
		The potential capacity for each use is dependent on the division of uses across the site.
New homes (C3 use class)	<input checked="" type="checkbox"/>	100-180 dwelling s
Mobile homes (C3 use class)	<input type="checkbox"/>	pitches
Older persons accommodation (C2 use class)	<input checked="" type="checkbox"/>	25 dwelling s
Traveller accommodation	<input type="checkbox"/>	pitches plots
Self and / or custom build plots	<input checked="" type="checkbox"/>	25 plots
Office	<input checked="" type="checkbox"/>	1,500 sqm
Light / General Industrial	<input type="checkbox"/>	sqm
Storage uses	<input type="checkbox"/>	sqm

Retail		sqm
Leisure (e.g. community facilities, recreation facilities)		4,000 sqm
Cultural (e.g. places of worship)		sqm
Other use(s) (please describe)		

Is the site suitable for a mix of uses (e.g. a new settlement including housing and employment)? Please specify and if there a range of development options available please provide further details below and / or attach further information if necessary:

Yes - housing (Class C3 and C2), employment and community uses.


Reason for suggested development (e.g. the current use is no longer needed, the current use is not viable, the location does not suit the needs of the occupier):

Part of the site is within the defined settlement policy boundary, the remainder is vacant. The site benefits from an access onto Lymington Bottom.

The site links to the proposed Four Marks South Large Development Site.

Availability

Broadly what timeframe would you anticipate the site could first become available for the suggested development:

1 – 5 years		11 – 15 years	
6 – 10 years		Longer than 15 years	

Once commenced, how many years do you think it would take to develop the site? years

2 years

Please provide an indicative phasing plan for proposals over 100 dwellings/10,000sqm.

Please see drawing number: FA-R19-05-A103

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		Legal issues	
Tree cover		Contamination / pollution	
Topography		Environmental designation (Ecology)	
Important open space		Flood risk	
Listed Building(s) or Ancient Monument		Infrastructure/utility requirements	
Local character		Market viability	
Ownership issues		Cables, pylons, electricity lines, oil pipelines	

Please provide further details on the constraints identified above, or any additional constraints that you are aware of:

There are no known constraints to development.

Please refer to supporting report prepared by Fredrick Adam Ltd dated 26 May 2021.

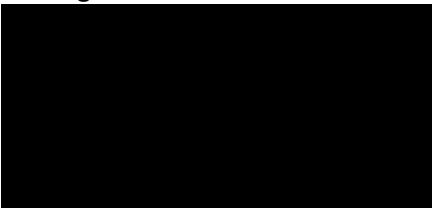
Do you believe the constraints on the site can be overcome? If so, please explain why and how

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.

Please refer to supporting report prepared by Fredrick Adam Ltd dated 26 May 2021.

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.



Any other relevant information?

Please refer to supporting report prepared by Fredrick Adam Ltd dated 26 May 2021.

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:

26 May 2021



Please email your completed form to localplan@easthants.gov.uk

87 LYMINGTON BOTTOM, FOUR MARKS

ALTON, HAMPSHIRE, GU34 5AH

SITE SUBMISSION

LAND AVAILABILITY ASSESSMENT (LAA)

PREPARED ON BEHALF OF 

BY FREDRICK ADAM LTD

26 MAY 2021



87 LYMINGTON BOTTOM, FOUR MARKS

ALTON, HAMPSHIRE, GU34 5AH

SITE SUBMISSION

LAND AVAILABILITY ASSESSMENT

EAST HAMPSHIRE DISTRICT COUNCIL

PREPARED ON BEHALF OF 

BY FREDRICK ADAM LTD

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Fredrick Adam Ltd



CONTENTS**PAGE NUMBER**

1. INTRODUCTION	4
2. SITE SURVEY INFORMATION	6
3. LINK TO FOUR MARKS SOUTH	13
4. CONCLUSION	15

APPENDICES

Appendix 1: Site location plan: drawing number: FA-R19-05-A101

Appendix 2: Road connections: drawing number: FA-R19-05-A105

Appendix 3: Site photographs taken in April 2021

Appendix 4: Land use plan: drawing number: FA-R19-05-A106

Appendix 5: Wider land use plan: drawing number: FA-R19-05-A107

Appendix 6: Tree protection plan: drawing number FA-R19-05-A104

Appendix 7: Mains sewer pipeline plan

Appendix 8: Relationship with Four Marks South: drawing number: FA-R19-05-A108

Appendix 9: Phasing plan: drawing number: FA-R19-05-A103

1.0 INTRODUCTION

- 1.1 In response to East Hampshire District Councils (EHDC) call for sites, Fredrick Adam Ltd has been instructed by [REDACTED] the owners of number 87 Lymington Bottom, to submit the land identified on drawing number: FA-R19-05-A101, for consideration for housing, employment and community use in the Land Availability Assessment (LAA) (*appendix 1*).
- 1.2 The site is located off Lymington Bottom in Four Marks, and measures a total of 11.46 acres.
- 1.3 As defined on drawing number FA-R19-05-A101, the site comprises 0.239 acres of land (968.87 square metres) located within the defined Settlement Policy Boundary (SPB), and 11.221 acres of land outside the SPB.
- 1.4 The area within the SPB, comprises a detached two-storey dwelling house, which is set well back from the road, and benefits from an access directly off Lymington Bottom. Residential amenity space is located to the front, sides and rear.
- 1.5 Agricultural land, within the same ownership, is located to the east/southeast.

LAND AVAILABILTY ASSESSMENT (LAA)

- 1.6 The government is seeking to ensure that land availability is not a constraint to the delivery of new homes and economic development uses over the local plan period.
- 1.7 In accordance with government guidance in the form of the National Planning Policy Framework (2019) and the National Planning policy Guidance (NPPG), Local Planning Authorities (LPAs) are required to prepare a Land Availability Assessment (LAA) to identify land for development.
- 1.8 The LAA identifies a future supply of land, which is suitable, available and achievable for development, and does not determine whether a site should be allocated. It provides a complete audit on a range of sites, and the development plan (DP) determines which of these sites, if any, are most suitable to meet identified need.
- 1.9 The NPPG confirms that a LAA should:
 - Identify sites and broad locations with potential for development;

- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

1.10 This report accompanies a copy of the relevant completed EHDC site submission form, and provides an initial desk-top assessment of the site against relevant opportunities and constraints.

2.0 SITE SURVEY INFORMATION

2.1 The following paragraphs provide site survey information, specifically in relation to the site and surrounding area i.e site context, and also the characteristics of the site itself.

SITE SIZE, BOUNDARIES AND LOCATION

2.2 The site is located within the parish of Four Marks, and within the north west part of East Hampshire.

2.3 As shown on drawing number FA-R19-05-A101, the site measures a total of 11.46 acres; 0.239 acres within the SPB, and 11.221 outside (**appendix 1**).

2.4 Lymington Bottom is predominantly a residential road, and runs along the western boundary of the site. Drawing number FA-R19-05-A105 confirms the established connection between Lymington Bottom, Alton Lane, Gradwell Lane, Brislands Lane, Blackberry Lane, Kitwood Road and Hawthorn Road (**appendix 2**).

2.5 A detached residential dwelling house (Class C3) is located to the north of the site.

2.6 Detached residential dwellings are located immediately opposite the site, to the south west.

2.7 Belford House, a residential care home, which is set within approximately 3 acres, is located immediately south of the site.

2.8 As shown on drawing number FA-R19-05-101, hedging runs along the land identified as agricultural. At this point, agricultural land outside the ownership of [REDACTED] bounds the site to the east. It runs parallel and infills the section between Alton Lane and Blackberry Lane. Agricultural land is also located to the south of the site; and a mix of agricultural and garden land to the north, which extends from the rear of the residential plots fronting Blackberry Lane.

2.9 Photographs of the site taken in April 2021 are enclosed at (**appendix 3**).

CURRENT LAND USE AND CHARACTER

2.10 Land use is the characterisation of land, based on what can be built on it and what the land can be used for.

2.11 The most common land uses are:

- Residential.
- Recreational.
- Agricultural.
- Commercial.
- Transport.

2.12 Drawing number FA-R19-05-A106 illustrates the current land use and character for the site (*appendix 4*).

LAND USES AND CHARACTER OF THE SURROUNDING AREA

2.13 In considering the land use and character of the surrounding area, paragraph 4.1.10 of the EHDC Neighbourhood Character Study (2018) states:

“Four Marks lies on an elevated undulating clay plateau with the clay cap overlying chalk bedrock. It is the highest settlement in Hampshire at roughly 220m above sea level. It is on the old Pilgrims’ Way, the historical route taken by pilgrims from Winchester to Canterbury. Four Marks is a relatively modern village which only expanded significantly in the second half of the 20th century and which has continued to grow in recent years with much new housing being built. Before the turn of the century there was no settlement at Four Marks. Early OS mapping (1866 – 1889) shows the railway, which arrived in 1868 passing through open countryside.

Large areas of woodland sat to the east and northeast, much of which remains together with many of the old field boundaries. By the turn of the century, some cottages had been built close to the inn and the settlement was identified as Four Marks. To the south a row of smallholdings on one and two-acre plots with small houses along Blackberry Lane built for veterans of the Crimean War was to follow. Further development of the village followed but most has taken place since the end of World War II. There have been a significant number of

planning applications in recent years, many of which are recently completed or still under construction.”

2.14 Drawing number FA-R19-05-A107 also illustrates the land uses and character of the wider area (**appendix 5**).

PHYSICAL CONSTRAINTS

2.15 The site submission form categorises physical constraints as follows:

- Access.
- Tree cover.
- Topography.
- Important open space.
- Listed building(s) or Ancient Monuments.
- Infrastructure/Utility requirements
- Cables, pylons, electricity lines, oil pipelines.
- Ownership Issues.

2.16 In the context of the site, we address each of these below.

Access

2.17 As shown on drawing number FA-R19-05-A101, access to the site is provided directly off Lymington Bottom (**appendix 1**).

2.18 An Access Feasibility Study, carried out in January 2021, which includes forecast information from traffic surveys undertaken in 2017, has been undertaken by Highgate Transportation Ltd. The study has been prepared on the basis of the site being developed independently to provide up to 180 new dwellings. The site is also capable of accommodating a mix of uses.

2.19 The report concludes that the existing access is safe and appropriate; and that the use will result in no adverse material impact on the local network for a development of up to 180 dwellings.

Tree Cover

- 2.20 A review of the adopted EHDC Local Plan Proposals Map (2014) confirms that there are no trees which are subject to Tree Preservation Orders on the site.
- 2.21 A number of trees within the planning unit for Bedford House are subject to TPOs (LPA Ref: (EH236)90) (**appendix 6**).
- 2.22 Due to the location of the trees, and subject to a Arboricultural Survey and Method Statement, the protected trees to the south and south east will not present a constraint to development of the site.

Topography

- 2.23 The land gently slopes to the north and slightly east and west from the central section.
- 2.24 There are no significant gradient constraints which would prevent redevelopment of the site.

Important Open Space

- 2.25 The site is not designated as Important Open Space.

Listed Buildings and Ancient Monuments

- 2.26 There are no listed buildings or ancient monuments on the site or within the immediate vicinity of the site.
- 2.27 The closest listed building is Jayswood Cottage on Hawthorn Lane.

Infrastructure and Utility Requirements

- 2.28 A main waste water drainage pipeline (sewer) runs from the northeast, down the centre of the site and along the access driveway, joining the main drain in Lymington Bottom. A drawing is attached at (**appendix 7**) to confirm the location of the pipeline.

Cables, pylons, electricity lines, oil pipelines

- 2.29 There are no cables, pylons, electricity lines or oil pipelines running across the site.

Ownership

- 2.30 There are no legal impediments to development.
- 2.31 A copy of the land registry titles and a letter from [REDACTED], confirming their intent to have their site considered in the LAA for housing, is submitted with the completed site submission form.
- 2.32 The owners of title HP375430 are also the majority shareholders of Leevan Ltd, the company that owns title SH55437.
- 2.33 All shareholders of Leevan Ltd are committed to making the site available for development.
- 2.34 There are no ownership issues that would prevent the site being developed if allocated.

POTENTIAL ENVIRONMENTAL CONSTRAINTS

- 2.35 The site submission form categorises environmental constraints as follows:
- Designations.
 - Contamination.
 - Flood risk.
- 2.36 In the context of the site, we address each of these below.

Designations

- 2.37 A review of the adopted EHDC Local Plan Proposals Map (2014) confirms that part of the site is located within the defined SPB and part outside.
- 2.38 There are no site-specific designations covering the site.

Contamination

- 2.39 There is no known contamination risk on the site.

Flood Risk

- 2.40 A review of the Environmental Agency Flood Risk Map confirms that the site is in flood zone 1, with a low probability of flooding.

CONSISTENCY WITH DEVELOPMENT PLAN POLICIES

- 2.41 The DP comprises the saved policies of the EHDC Local Plan (2006), the Joint Core Strategy (JCS) (2014), and the Medstead and Four Marks Neighbourhood Plan (2016).
- 2.42 The redevelopment of the site for housing will be considered against the provisions of the DP, unless material considerations indicate otherwise.
- 2.43 The principle of developing the site for housing will be considered against policies CP2, CP10 and CP19 of the JCS, and policy 1 of the Neighbourhood Plan.
- 2.44 Policy CP2 of the JCS confirms that new development should make the best use of previously developed land and buildings within existing built-up areas.
- 2.45 Policy CP10(2) of the JCS confirms that provision for new housing will be supported within defined SPBs of towns and villages where it is consistent with maintaining and enhancing their character and quality of life. Criterion (4) of policy CP10 confirms that a minimum of 175 houses will be located at both Liphook and Four Marks/South Medstead, stating: “sites will be identified through the Local Plan: Allocations, SDNP Local Plan or Neighbourhood Plans and settlement policy boundaries adjusted accordingly. Housing should be accommodated through development and redevelopment opportunities within existing settlement policy boundaries in the first instance.”
- 2.46 Policy CP19 of the JCS states: “the approach to sustainable development in the countryside, defined as the area outside settlement policy boundaries, is to operate a policy of general restraint in order to protect the countryside for its own sake. The only development allowed in the countryside will be that with a genuine and proven need for a countryside location, such as that necessary for farming, forestry, or other rural enterprises (see Policy CP6). Within the South Downs National Park the pursuit of National Park purposes will be paramount.”
- 2.47 Redevelopment of the section of the site falling within the SPB for housing would be consistent with DP policy and national policy.
- 2.48 At this point in time, redevelopment of the section of the site falling outside the SPB would fall contrary to policy, unless material considerations indicate otherwise.

PROXIMITY TO SERVICES AND OTHER INFRASTRUCTURE

- 2.49 Drawing number FA-R19-05-A107 confirms the local services and infrastructure which we consider are easily accessible from the site (**appendix 5**).
- 2.50 The site can accommodate a mix of uses to provide greater access to facilities for local residents.
- 2.51 Lymington Bottom predominantly provides access to single dwelling properties and is subject to a 30mph speed restriction. The road is lit.
- 2.52 The site is located 820 metres from the A31, and within five minutes drive of the village centre, where there is a range of local shops, which address the daily needs of residents, and also those people passing through the village.
- 2.53 The site is located within walking distance of fourteen bus stops, and between 10 and 15 minutes drive from Alton train station. The Watercress Line to Alresford can be accessed via foot or car from the site.
- 2.54 Four Marks School is located within walking distance of the site, and Medstead and Chawton Primary School a short distance via car.
- 2.55 Alton, Farnham, Alresford, Winchester and Guildford are located between 15 and 35 minutes drive from the site.
- 2.56 National Cycle Network route number 224 is located around 2.5km north of the site. It runs from Farnham to Medstead, and from Wickham to Gosport, with both on-road routes and traffic free-routes within the vicinity of the site. Route 224 connects to route 23 in Medstead, with route 23 running from Reading to Southampton via Basingstoke, Alresford, Winchester and Eastleigh. The route is predominantly an on-road route, and is within the vicinity of the site.
- 2.57 The site is in a sustainable location, with access to services on foot, cycle and via private car.

SITE SUITABILITY FOR HOUSING OR A MIX OF USES

- 2.58 The site is being put forward for housing, but it could accommodate a mix of uses.

3.0 LINK TO FOUR MARKS SOUTH

3.1 Four Marks South Consortium, which is made up of five separate companies, is promoting five sites within close vicinity of number 87 Lymington Bottom.

3.2 [REDACTED] are not part of the consortium.

3.3 The proposal to redevelop 87 Lymington Bottom is privately funded, with funds guaranteed to deliver the redevelopment of the site by the shareholders of Leevan Ltd.

3.4 The consortium sites are being promoted on the basis they could provide a large strategic allocation of:

- Some 800 new homes, including affordable housing, and self build custom plots equating to 5% of the total number of homes delivered on the site.
- 1ha of employment land.
- A relocated (expanded) primary school.
- 0.2ha of land for a community use/building.
- A 100 unit care home.
- Subject to further investigation - gypsy and traveller pitches.
- Subject to further investigation - plots for travelling showpeople.
- Open space and parkland.

3.5 The natural relationship between the Four Marks South Consortium sites and number 87 Lymington Bottom is illustrated on drawing number FA-R19-05-A108 (**appendix 8**).

3.6 The site logically links to those being promoted by the consortium, with the added benefit of a separate access onto Lymington Bottom.

3.7 Highgate Transportation Ltd has undertaken an access feasibility study for a development of up to 180 dwellings on the site. Forecasts from traffic surveys undertaken in 2017, prior to Covid-19, confirm that visibility splays commensurate

with the percentile speeds can be provided in accordance with Manual for Streets 2 (2010) Table 10.1 Derived Sight Stopping Distances (SSDs) for streets.

- 3.8 The proposed visibility splays have been checked against the highway ownership boundary obtained from Hampshire County Council (HCC), and it is confirmed that the splays do not cross onto third party land, and are within the highway boundary.
- 3.9 It is anticipated that the site access and main internal access roads would be offered for adoption.
- 3.10 The site can be developed independently of the consortium sites, or as part of a larger strategic allocation.
- 3.11 Due to the private ownership of the site, the council can have confidence that the owners will not hold up the delivery of new housing, i.e. due to developer finance, mortgage deals, or by seeking to re-negotiate any s106 agreement.

4.0 CONCLUSIONS

- 4.1 The site comprises 11.46 acres and is located in a suitable, accessible and sustainable location.
- 4.2 The site could be redeveloped independently of the Four Marks South large development site to provide a mix use development with up to 180 new dwellings, or could form part of a larger strategic allocation.
- 4.3 There are no site-specific designations covering the site, and no known environmental or technical constraints that would prevent redevelopment, should the site be allocated.
- 4.4 The site is close to a range of facilities, services and schools and within close proximity to cycle and bus routes.
- 4.5 The site is controlled by [REDACTED] and is available.
- 4.6 In accordance with the requirement on the site submission form, a plan indicating how the redevelopment of the site could be phased is enclosed at (**appendix 9**).



**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	Mr Martin Pratt
Company / Agent	Leevan Ltd
Representing	████████████████████
Contact Address	██ ████████████████████
Contact Telephone No.	██████████
E-mail	████████████████

Site details
<p>Full address of site (this must be accompanied by a map showing the site boundary). <u>Without this mapped information we are unable to register the site.</u></p> <p>87 Lymington Bottom, Four Marks, Alton, Hampshire, GU34 5AH</p>
<p>Site area (hectares) 4.64</p>
<p>Landowner details (Please note: <u>you must</u> 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.</p> <p>Please see attached title references: HP375430 and SH55437 and letters from ██████████ ██████████</p>

Current and Potential use**Current land use and description** (e.g. previously developed land, greenfield)

Part residential garden land (within the defined Settlement Policy Boundary), and part agricultural occasional sheep and cattle grazing land with no built structures (greenfield).

Please refer to supporting report prepared by Leevan Ltd dated March 2024.

Condition of current use (e.g. vacant, derelict, poor quality)

Residential garden land (reasonable quality) and occasional sheep and cattle grazing agricultural land (Grade 3 Agricultural Land Classification).

Please refer to supporting report prepared by Leevan Ltd dated March 2024.

Relevant planning history of site (please provide planning application numbers if available)

This land was submitted for inclusion in the Land Availability Assessment by Mrs Kerry Dames of Fredrick Adam Ltd on 26 May 2021.

An outline planning application (Ref: 52254) for a proposed residential development on land to the rear of 87 Lymington Bottom, Four Marks was submitted to East Hampshire District Council on 15/11/2023.

The description of the application is as follows:

'Outline planning application with all matters reserved except for means of access for the erection of up to 95 dwellings to include the provision of vehicular access point, public open space, landscaping, sustainable drainage systems (SuDS) and up to 2,100 m2 of land in a flexible Class E(e) (Commercial, Business and Service) and Class F2(a) (Local Community) use.'

The supporting documents submitted as part of the application demonstrate the significant social, environmental and economic benefits of a high-quality new development in a sustainable location. The supporting documents confirm that no unacceptable adverse impacts would arise due to new development on the site that would significantly and demonstrably outweigh the benefits.

The application is currently being determined with an expiration date of 30/04/2024.

Proposed land use	Please tick	Potential capacity of site for specific uses
New homes (C3 use class)	X	Up to 95 dwellings
Mobile homes (C3 use class)		
Older persons accommodation (C2 use class)	X	Up to 25 of the dwellings
Traveller accommodation		
Self and / or custom build plots		
Office		
Light / General Industrial		
Storage uses		
Retail		
Leisure (e.g. community facilities, recreation facilities)	X	Up to 2,500 sqm
Cultural (e.g. places of worship)		
Suitable Alternative Natural Greenspace (SANG)		
Biodiversity Net Gain off site mitigation		
Other use(s) (please describe)		Public open green space > 1 hectare

Is the site suitable for a mix of uses (e.g. a new settlement including housing and employment)? Please specify and if there a range of development options available please provide further details below and / or attach further information if necessary:

Yes - housing (Class C3 and C2), employment and community facilities as well as new public open green space.

Reason for suggested development (e.g. the current use is no longer needed, the current use is not viable, the location does not suit the needs of the occupier):

The site benefits from access onto Lyminster Bottom.

The site provides an opportunity to meet local housing needs including over 90% smaller homes to meet demographic trends including provision for single story dwellings suitable for older and disabled people and provide for employment and community uses (if required) as well as new public open green space and new pedestrian/cycle routes to improve connectivity and significantly improve sustainable transport provision in Four Marks.

Availability

Broadly what timeframe would you anticipate the site could first become available for the suggested development:

1 – 5 years	X	11 – 15 years	
6 – 10 years		Longer than 15 years	

Once commenced, how many years do you think it would take to develop the site?

2-3 years

Please provide an indicative phasing plan for proposals over 100 dwellings/10,000sqm.

N/A

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		Legal issues	
Tree cover		Contamination / pollution	
Topography		Environmental designation (Ecology)	
Important open space		Flood risk	
Listed Building(s) or Ancient Monument		Infrastructure/utility requirements	
Local character		Market viability	
Ownership issues		Cables, pylons, electricity lines, oil pipelines	

Please provide further details on the constraints identified above, or any additional constraints that you are aware of:

There are no known constraints to development.

Please refer to supporting report prepared by Leevan Ltd dated February 2024.

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.

Please refer to supporting report prepared by Leevan Ltd dated March 2024.

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.

██████████

████████████████████

██████████

Any other relevant information?

The site was previously submitted to the EHDC Land Availability Assessment in 2021. Please refer to supporting report prepared by Fredrick Adam Ltd dated 26/05/2021. The site has been included in LAA/FM-031 & 042 but not individually, whereas the site is to be considered on a standalone basis, as well as together with adjacent sites, particularly LAA /FM-015, combined with which the proposed site provides a significant opportunity to improve pedestrian/cycle route connectivity within Four Marks.

Please refer to supporting report prepared by Leevan Ltd dated March 2024.

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: 02/03/2024

**Please return your completed Site
Submission Form to
localplan@easthants.gov.uk**

Title reference: SH55437

Land Availability Assessment Site Submission
Supporting Document

Leevan Ltd

Land to the rear of 87 Lymington Bottom, Four Marks

March 2024

Copyright © Leevan Limited (12428748)

The material presented in this report is the property of Leevan Limited and shall not be used by or distributed or made available to any other company or person without the knowledge and written consent of Leevan Limited.

Contents

1	Introduction	5
2	Current Land Use and Site Description	7
2.1	Relevant Planning History of the proposed site	7
3	Proposed Land Use	8
4	Site Constraints	8
4.1	Access	8
4.2	Legal issues	8
4.3	Tree cover	8
4.4	Contamination/pollution.....	9
4.5	Topography.....	9
4.6	Environmental designation (Ecology).....	9
4.7	Important open space	9
4.8	Flood risk	9
4.9	Listed Building(s) or Ancient Monument.....	10
4.10	Infrastructure/utility requirements.....	10
4.11	Local character	10
4.12	Market viability.....	10
4.13	Ownership issues.....	10
4.14	Cables, pylons, electricity lines, oil pipelines.....	10
4.15	On-site drainage	10
4.16	Green Infrastructure and Biodiversity.....	11
4.17	Noise.....	11
4.18	Residential Amenity.....	11
4.19	Agricultural land quality	11
4.20	Built heritage	11
4.21	Water quality.....	11
5	Comparison of the proposed site with sites submitted for allocation in the Draft Local Plan.....	12
5.1	Objective 1 - To protect, enhance and restore biodiversity and geodiversity across the East Hampshire planning area.....	13
5.2	Objective 2 - To minimise carbon emissions and contribute to achieving net zero carbon emissions in the East Hampshire planning area	14
5.3	Objective 3 - To promote adaptation and resilience to climate change.....	18
5.4	Objective 4 - To promote accessibility and create well-integrated communities.....	19
5.5	Objective 5 - To actively promote health and wellbeing across East Hampshire and create safe communities free from crime	20

5.6	Objective 6 - To strengthen the local economy and provide accessible jobs and skills development opportunities for local residents	21
5.7	Objective 7 - To protect and enhance built and cultural heritage assets in the East Hampshire planning area	21
5.8	Objective 8 - To provide good quality and sustainable housing for all	22
5.9	Objective 9 - To conserve and enhance the character of the landscape and townscape...	22
5.10	Objective 10 - To support efficient and the sustainable use of East Hampshire's natural resources.....	23
5.11	Objective 11 - To achieve sustainable water resource management and protect and improve water quality in the East Hampshire planning area	24
5.12	Objective 12 - To minimise air, noise and light pollution in the East Hampshire planning area	25
6	Summary	26
6.1	Housing	26
6.2	Connectivity.....	26
6.3	Accessibility to Community Facilities/Services.....	27
6.4	Flood Risk.....	28
6.5	Biodiversity	28
7	Conclusion.....	30

Appendices

Appendix A	Site Location Plan
Appendix B	Land Availability Assessment Site Submission Form (prepared by Fredrick Adam, dated 26th May 2021)
Appendix C	Supporting Report (prepared by Fredrick Adam, dated 26th May 2021)
Appendix D	Land Availability Assessment Site Submission Form (prepared by Leevan, dated 2 nd March 2024)

1 Introduction

The land to the rear of 87 Lymington Bottom, Four Marks, identified on Site Location Plan drawing number: 104-08 (Appendix A) (the proposed site) was submitted to East Hampshire District Council (EHDC) to be considered in the Land Availability Assessment on 26th May 2021.

A copy of the previously submitted Land Availability Assessment Site Submission Form (Appendix B) and the accompanying Supporting Report (prepared by Fredrick Adam, dated 26th May 2021) (Appendix C) are attached for reference.

On 11th July 2023, Leevan Ltd's agent at the time, Fredrick Adam Ltd, received the following email from localplan@easthants.gov.uk:

'Dear Sir/Madam,

East Hampshire District Council is currently preparing a new Local Plan, which will include site allocations for development.

I am writing to you as you have submitted land previously which currently forms part of the Land Availability Assessment (LAA), and we are seeking confirmation either from you as the landowner or as the agent that the land in question is still available and that you are still interested in having your land included in the LAA.

If you could please respond to this email to the following address localplan@easthants.gov.uk by Friday 21st July 2023 to confirm that the land is still available. If we do not hear from you by this date, we will assume that the proposed site is no longer available and will be removed from the LAA.

Please note this email does not suggest the land is suitable for development, and any development still requires planning permission where required. The LAA is essentially a list of available sites which the Council uses to identify potential sites for allocation in the Local Plan.

Further information about the Local Plan and the LAA is available on the Council's website at www.easthants.gov.uk/draft-local-plan.

Regards,

Jamie Biltcliffe'

Fredrick Adam Ltd responded the following via email on 12th July 2023.

'Dear Sir/Madam

In response your email, I can confirm that I would like my client's sites to still be considered for inclusion in the LAA, they are still available.

Kind regards

Kerry Dames'

On 15th November 2023, Leevan Ltd emailed the following to localplan@easthants.gov.uk:

'Dear Sir/Madam,

RE: Land to the rear of 87 Lymington Bottom, Four Marks

It was confirmed by Kerry Dames (Fredrick Adam Ltd) on 12th July 2023 that the land in question is still available and that we would like the land included in the LAA.

Please see attached a site location plan for the land in question.

Please could you confirm if the land is included in the LAA?

Best regards,

Nick'

EHDC responded the following via email on 28th November 2023:

'Hi Nick

Apologies for the delay in reply.

I can confirm that LAA/FM-031 now displays on the LAA interactive map:

Land availability assessment | East Hampshire District Council (easthants.gov.uk)

Kind Regards

Sarah Hamilton'

An oversight/error by EHDC appears to have occurred as the proposed site has been included in the LAA as part of the Four Marks South (LAA/FM-031) site but not as an independent site.

Subsequently, the proposed site has not been considered independently for allocation by EHDC or considered independently as part of the Draft Local Plan documents including the Integrated Impact Assessment (IIA) for the East Hampshire Local Plan and the Draft Local Plan.

In response to East Hampshire District Council's (EHDC) call for sites, Leevan Ltd submit the land identified on Site Location Plan drawing number: 104-08 (Appendix A) (the proposed site), for consideration for housing, employment and community use in the Land Availability Assessment (LAA) (see Appendix D).

This document provides an update on the current status of the proposed site and supporting information that demonstrates that the proposed site is worthy of being allocated in the final version of the Local Plan.

The following documents are submitted in support of this document:

- Transport Assessment, prepared by Highgate Transportation Ltd
- Arboricultural Survey, prepared by Bernie Haverson
- Contamination Assessment, prepared by Ground and Water Ltd
- Nutrient Desktop Survey, prepared by Earthcare Technical Ltd
- Flood Risk Assessment, prepared by Ground and Water Ltd
- Combined Drainage Strategy Report, prepared by Nola Design Ltd
- Biodiversity Net Gain Assessment, prepared by Rachel Hacking Ecology Ltd
- Ecological Mitigation and Enhancement Strategy, prepared by Rachel Hacking Ecology Ltd

2 Current Land Use and Site Description

The proposed site is to the east of Lymington Bottom and measures a total of approximately 4.64 hectares.

The proposed site comprises approximately 0.10 hectares of land located within the defined Settlement Policy Boundary (SPB), and 4.54 hectares of land outside the SPB.

Defra Mapping identifies the land outside of the SPB as Grade 3 Agricultural Land Classification (ALC), which is currently a grazing field with no built structures.

The proposed site is in a shallow dry valley with a southwest to northeast orientation. The ground falls from the northern corner of the proposed site to a low point near to where the proposed site joins Lymington Bottom and the proposed site sits higher in the north side of the shallow valley than the south side.

Over-grown hedges with scattered mature trees enclose the proposed site. A patch of hawthorn trees grows on an old pit (filled in) and would be removed to enable new development. There are no other trees within the proposed site.

An existing mains sewer passes through the proposed site along an alignment convenient for new development.

The proposed site is not covered by any national statutory or non-statutory designations for landscape, historical or ecological character or quality.

The proposed site is not traversed or bounded by public rights of way and views in and out of the proposed site are limited by the existing perimeter green infrastructure.

Land use around the proposed site is residential (including a neighbouring care home) and pastoral agriculture.

Outside the proposed site boundary to the northwest, long gardens run down from the houses along Blackberry Lane. Back gardens from the houses along Lymington Bottom meet the southwest side of the proposed site and at the northern corner, a cul-de-sac of bungalows, Bernard Avenue, meets the north corner of the proposed site. Eastwards, the proposed site is contiguous with a long rectangular pasture of gradually rising land.

The topography of the land surrounding the proposed site is rolling; the valley in which the proposed site sits continues to the northeast and Lymington Bottom follows the alignments of another valley heading southeast. Land to the north of the proposed site continues to rise to the A31 Winchester Road and north-eastwards and another gentle rise occurs west of Lymington Bottom.

The South Downs National Park lies approximately 0.67 miles (1 km) to the east of the proposed site at its nearest point.

2.1 Relevant Planning History of the proposed site

An outline planning application (Ref: 52254) for a proposed residential development on land to the rear of 87 Lymington Bottom, Four Marks was submitted to East Hampshire District Council on 15th November 2023.

The description of the proposed development is as follows:

‘Outline planning application with all matters reserved except for means of access for the erection of up to 95 dwellings to include the provision of vehicular access point, public open space, landscaping, sustainable drainage systems (SuDS) and up to 2,100 m² of land in a flexible Class E(e) (Commercial, Business and Service) and Class F2(a) (Local Community) use.’

The supporting documents submitted as part of the application demonstrate the significant social, environmental and economic benefits of a high-quality new development in a sustainable location. The supporting documents confirm that no unacceptable adverse impacts would arise due to new development on the proposed site that would ‘significantly and demonstrably’ outweigh the benefits.

Leevan is committed to working with EHDC to ensure the development is in keeping with the character and density of development within Four Marks.

The application is currently being determined with an expiration date of 30th April 2024.

3 Proposed Land Use

The proposed site is suitable for a mix of uses including housing (Class C3, C2 and self and/or custom build plots), employment and community facilities as well as new public open space.

The proposed site benefits from access onto Lymington Bottom and provides an opportunity to meet local housing needs and provide for employment and community uses (if required) as well as new public open space and new pedestrian/cycle routes to improve connectivity.

4 Site Constraints

4.1 Access

There are no identified constraints to development in relation to access.

Vehicular access to the proposed site can be taken from Lymington Bottom. A Transport Assessment (TA) submitted in support of application reference 52254 concludes appropriate visibility splays can be provided (using the appropriate calculation set out in the current guidance document Manual for Streets 2), an appropriate strategy for servicing and delivery vehicles can be provided, and an appropriate strategy for access by emergency service vehicles can be provided via a new simple priority junction arrangement. The assessment has been prepared on the basis of the proposed site being developed independently to provide up to 95 new dwellings.

4.2 Legal issues

There are no identified constraints to development in relation to legal issues.

4.3 Tree cover

There are no identified constraints to development in relation to tree cover.

A review of the adopted EHDC Local Plan Proposals Map (2014) confirms that there are no trees which are subject to Tree Preservation Orders on the proposed site.

An Arboricultural Survey has been submitted in support of application reference 52254, which confirms that the trees within and surrounding the proposed site will not present a constraint to development.

4.4 Contamination/pollution

There are no identified constraints to development in relation to contamination/pollution.

A Contamination Assessment has been submitted in support of application reference 52254. The Ground Investigation was undertaken following chemical laboratory testing on soil samples recovered from the proposed site to enable recommendations for the safe redevelopment of the proposed site and the protection of site workers, end-users and the public from any potential contamination identified. The assessment comprises a Tier 2 Generic Quantitative Risk Assessment, under Land Contamination Risk Management (LCRM).

4.5 Topography

There are no identified constraints to development in relation to topography.

4.6 Environmental designation (Ecology)

There are no identified constraints to development in relation to environmental designations.

An initial desktop survey in support of application reference 52254 has shown that the proposed site is not within a catchment identified as containing designated sensitive estuarine or surface water sites, such as a Special Protection Area (SPA) or Special Area of Conservation (SAC), or their component Sites of Special Scientific Interest (SSSIs) which are in an unfavourable condition due to elevated nutrient levels and is therefore not subject to nutrient neutrality.

The proposed site is within the Wey and Trib Management Catchment of the Thames.

The proposed site is within Thames Waters operational area, and final effluent would be discharged outside of a nutrient neutrality affected area once treated. Therefore, no further nutrient neutrality assessment is required.

4.7 Important open space

There are no identified constraints to development in relation to important open space.

4.8 Flood risk

There are no identified constraints to development in relation to flood risks.

As the proposed site is completely within a Flood Zone 1 and no flood models are available which show the proposed site being flooded from rivers and seas, no flood resistance measures, resilience measures and excavation routes are considered necessary. Hampshire County Council Drainage (Comment Date: Wed 03 Jan 2024) have commented that the proposed site is within Flood Zone 1 and is generally at very low risk of flooding.

A Flood Risk Assessment has been submitted in support of application reference 52254. Methods of ensuring the flood risk is minimised are recommended involving implementation of a Sustainable Urban Drainage Systems (SuDS).

4.9 Listed Building(s) or Ancient Monument

There are no identified constraints to development in relation to listed buildings or ancient monuments.

The nearest Grade II Listed Building is located along Hawthorn Lane approximately 0.9 miles (1.5km) from the proposed site. There is no inter-visibility between any Grade II Listed Buildings and the proposed site.

4.10 Infrastructure/utility requirements

There are no identified constraints to development in relation to infrastructure/utility requirements.

A 375dia foul sewer exists along Lymington Bottom. Branching off this is a 225dia foul sewer which extends across the proposed site and beyond in a north easterly direction. In the northern sector of the proposed site, a 150dia foul sewer branches off the 225dia and extends in a north westerly direction into land beyond the proposed site boundary.

4.11 Local character

There are no identified constraints to development in relation to local character.

4.12 Market viability

There are no identified constraints to development in relation to market viability.

4.13 Ownership issues

There are no identified constraints to development in relation to ownership issues.

A copy of the land registry titles is attached.

[REDACTED] are committed to making the proposed site available for development.

4.14 Cables, pylons, electricity lines, oil pipelines

There are no identified constraints to development in relation to cables, pylons, electricity lines, and oil pipelines.

4.15 On-site drainage

There are no identified constraints to development in relation to on-site drainage.

A Combined Drainage Strategy Report has been submitted in support of application reference 52254.

Hampshire County Council Drainage have commented on application reference 52254 that *'at this site, infiltration testing was undertaken at depths of one to two metres below ground level, with useable infiltration rates recorded. Groundwater levels are understood to be quite deep at this location, and there should be no issues utilising shallow infiltration features for this development'*.

4.16 Green Infrastructure and Biodiversity

There are no identified constraints to development in relation to green infrastructure or biodiversity.

A Provisional Environmental Assessment and Biodiversity Net Gain Assessment are submitted in support of application reference 52254, which conclude that the proposed site would not impact upon any ecological designations. An Ecological Mitigation and Enhancement Strategy is also submitted which provides mitigation and enhancement recommendations for the proposed site.

4.17 Noise

There are no identified constraints to development in relation to noise.

4.18 Residential Amenity

There are no identified constraints to development in relation to residential amenity.

4.19 Agricultural land quality

There are no identified constraints to development in relation to agricultural land quality.

4.20 Built heritage

There are no identified constraints to development in relation to built heritage.

There are no Conservation Areas in the immediate vicinity of the proposed site.

4.21 Water quality

There are no identified constraints to development in relation to water quality.

5 Comparison of the proposed site with sites submitted for allocation in the Draft Local Plan

An Integrated Impact Assessment (IIA) has been carried out alongside development of the East Hampshire Local Plan. The IIA for the East Hampshire Local Plan, January 2024 provides an assessment of the Draft Local Plan and its environmental, economic, social, health and equality impacts.

Objectives are used for appraising potential impacts of potential sites for allocation. Each objective is supported by a series of decision-making criteria. Together these form the IIA Framework.

The proposed site allocations considered for inclusion in the Local Plan have been assessed against the IIA Framework within the IIA for the East Hampshire Local Plan, January 2024.

Leevan Ltd have compared the proposed site with other sites within Four Marks submitted for allocation in the Draft Local Plan. The proposed sites that have been considered are as follows:

- FMS1, Land west of Lymington Barn (LAA Ref MED-022)
- FMS2, Land rear of 97-103 Blackberry Lane (LAA Ref FM-015)
- FMS4, Land south of Winchester Road, Four Marks (LAA Ref FM-013)
- Land at Lymington Bottom (LAA Ref FM-026)
- Four Marks South (LAA Ref FM-031)
- Land at Four Marks, south (LAA Ref FM-042)

The listed sites include those allocated in the Draft Local Plan as well as the Four Marks South site, which the proposed site has been included in but has not been assessed independently, and the adjacent site on Land at Lymington Bottom (Ref: 56082/004).

Appendix F of the IIA for the East Hampshire Local Plan, January 2024 and the attached table demonstrate that there is no substantial or material difference between the high-level assessment score summaries for each of the considered sites (with reference to Table 5.2 within the IIA for the East Hampshire Local Plan, January 2024).

The proposed site would be expected to achieve at least substantially similar scores to the allocated sites if assessed on the same basis given that the proposed site is adjacent to LAA Ref FM-026 and is adjacent to and shares a boundary with LAA Ref FM-015.

There are no site-specific designations covering the proposed site, and no known environmental or technical constraints that would prevent the proposed site being allocated in the final version of the Local Plan.

Furthermore, the proposed site offers significant opportunities in respect of the objectives for which negative impacts are assessed for other sites submitted for allocation in the Draft Local Plan. These opportunities are described below. In addition, the proposed site offers significant opportunities when directly compared to the allocated sites, particularly when combined with the adjacent allocated site LAA Ref FM-015. These opportunities are also described below.

These opportunities demonstrate that the proposed site would score highly if assessed on the same basis and that the proposed site is worthy of being allocated in the final version of the Local Plan.

5.1 Objective 1 - To protect, enhance and restore biodiversity and geodiversity across the East Hampshire planning area

Decision-making criteria:

- Protect and enhance local, national and international nature conservation interests.
- Increase habitat connectivity and enhance biodiversity in East Hampshire, including supporting the delivery of the forthcoming Local Nature Recovery Strategy
- Achieve net gains in biodiversity, with new developments expected to secure 10% net gain
- Contribute towards the maintenance and enhancement of green and blue infrastructure

An Ecological Mitigation and Enhancement Strategy and a Biodiversity Net Gain Assessment are submitted in support of application reference 52254, which provides mitigation and enhancement recommendations for the proposed site.

New development on the proposed site would retain and enhance the perimeter green infrastructure to form a significant landscape buffer to the perimeter of the proposed site. As well as maintaining the existing perimeter green infrastructure to mitigate visual impact on surrounding views, a biodiversity net gain of greater than 10% is achievable by providing enhanced green spaces with provision of wildlife areas and new tree and hedgerow planting.

The following sets out how the proposed site is capable of achieving multi-functional green spaces and enhancement of biodiversity:

- Introduce a range of trees species, focusing on native species in open spaces with some non-native and fruiting species that will each attract a range of insects, birds etc.
- Create linear green corridors connected to the wider green infrastructure network.
- Include a varied mix of native shrubs that will provide food and shelter for wildlife including specific plants for pollinators.
- Incorporate species rich grass/meadow mixes which are low maintenance to promote increased biodiversity;
- Incorporate a range of bat and bird boxes throughout the proposed site.
- Include a structures such as log piles hibernacula, utilising wood from felled trees.
- Provision of hedgehog habitats including brash piles and increasing permeability across and beyond the proposed site.
- Adopt an appropriate management regime that promotes biodiversity.

In comparison to the adjacent site LAA Ref FM-015, the proposed site has a greater relative length of existing perimeter green infrastructure. The proposed site has substantial existing green infrastructure around three sides, whereas the LAA Ref FM-015 site has existing green infrastructure around two sides.

Hedgerows and trees on the proposed site boundaries are an important characteristic of the proposed site, helping to integrate it with the rural landscape to the south. The proposed site includes a greater number of hedgerows and trees on the proposed site boundaries when compared to the LAA Ref FM-015 site. This will help to integrate the proposed site with the adjacent rural landscape.

Maintaining and augmenting the green infrastructure on the proposed site boundaries would enhance the proposed site's sense of containment, helping to avoid adverse impacts on residential amenity whilst enhancing its relationship to the wider countryside.

As such, the proposed site would contribute to protecting, enhancing and restoring biodiversity and geodiversity and therefore should be considered as making a positive contribution to Objective 1, as confirmed with reference to Chapter 5: NBE2 to NBE7 and NBE12 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.2 Objective 2 - To minimise carbon emissions and contribute to achieving net zero carbon emissions in the East Hampshire planning area

Decision-making criteria:

- Reduce regulated and unregulated greenhouse gas emissions associated with modern lifestyles as part of a much faster transition towards net zero emissions than “business as usual”
- Prioritise sustainable modes of transport, including active travel (walking and cycling) and public transport
- Increase and improve accessibility to services and facilities, particularly in rural areas
- Reduce the need to travel by car, including through improved broadband provision and speed
- Promote energy generation from renewable sources
- Minimise energy consumption in new dwellings

An overlay of the proposed site location and the adjacent allocated site LAA Ref FM-015 location (below) demonstrates that together the sites provide an opportunity to significantly improve sustainable transport provision in Four Marks. This includes a proposed new walking/cycle link between Blackberry Lane and Lymington Bottom.

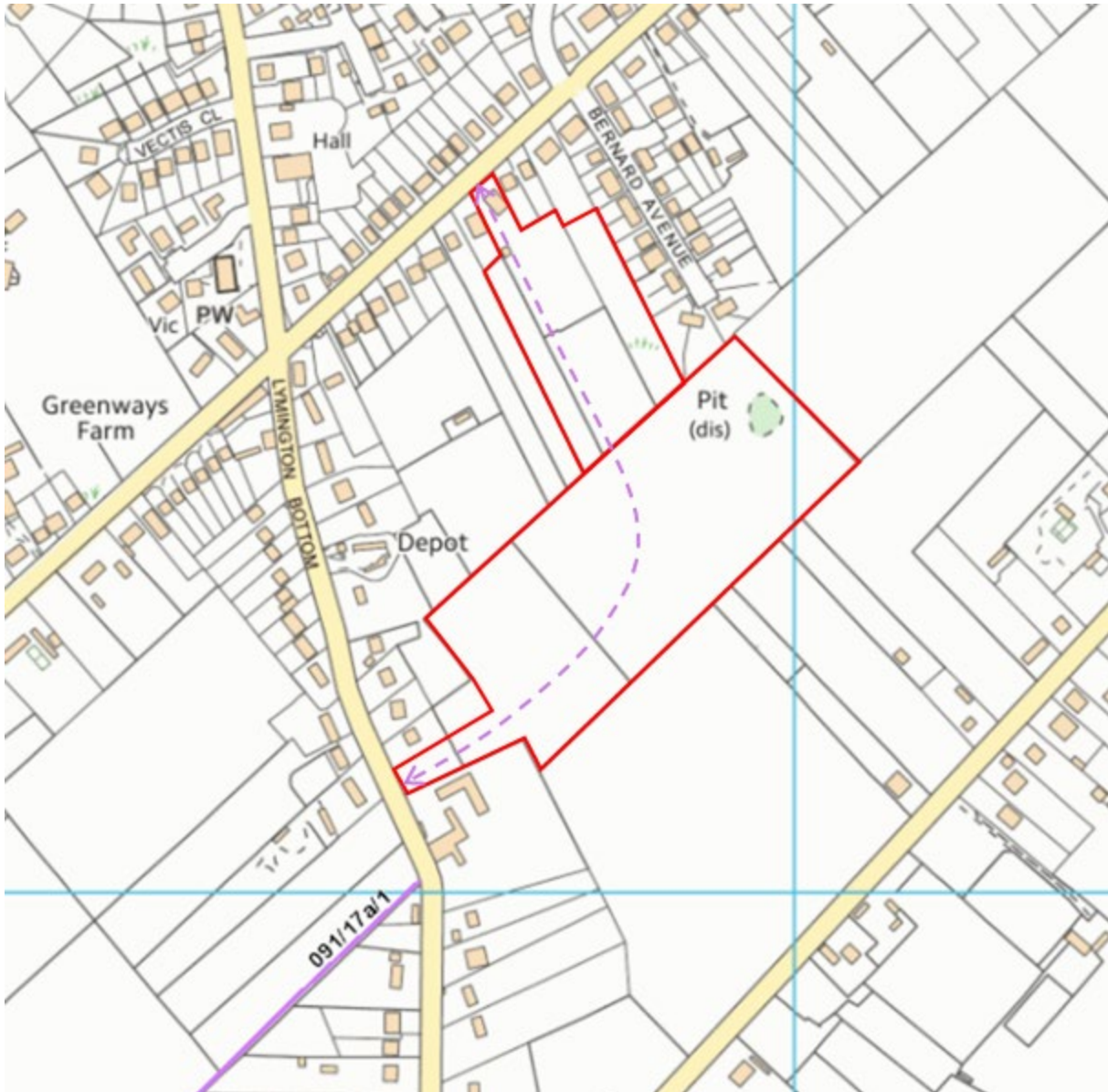


Figure 1: Proposed new walking/cycle link between Blackberry Lane and Lymington Bottom.

There is an opportunity to improve the quality, safety and convenience of pedestrian/cycle routes in Four Marks by providing a good quality link that can be extended through the LAA Ref FM-015 site towards the centre of the village and towards the local primary school.

In addition, at present there is a lack of connection between village footpath 17a and village footpath 16 as can be seen from the extract from the Map of public rights of way below.

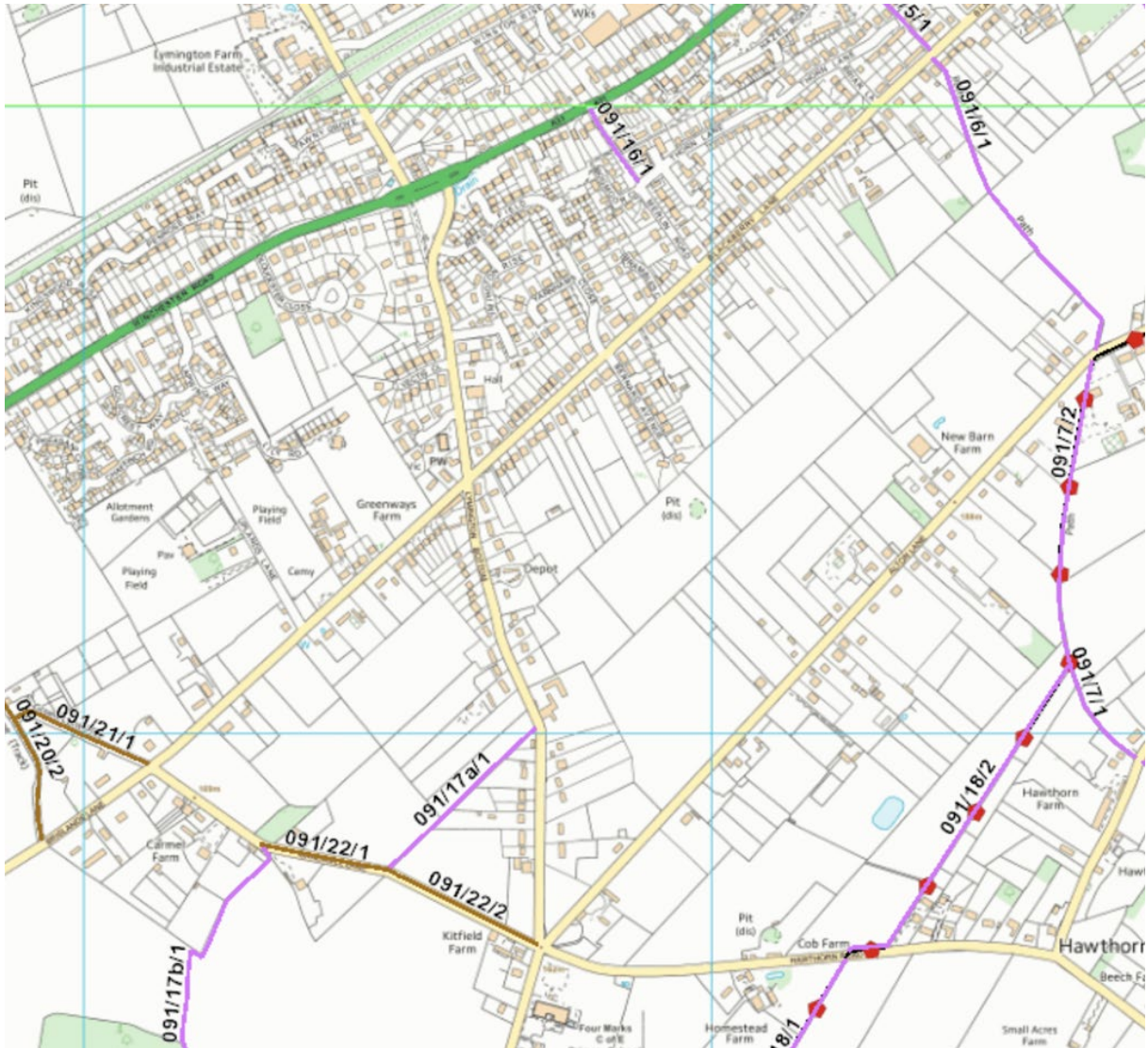


Figure 2: Lack of connection between village footpath 17a and village footpath 16

An overlay demonstrating the position of the proposed site and the LAA Ref FM-015 site below shows how the proposed connectivity would allow a pedestrian link between footpaths 16 and 17a.

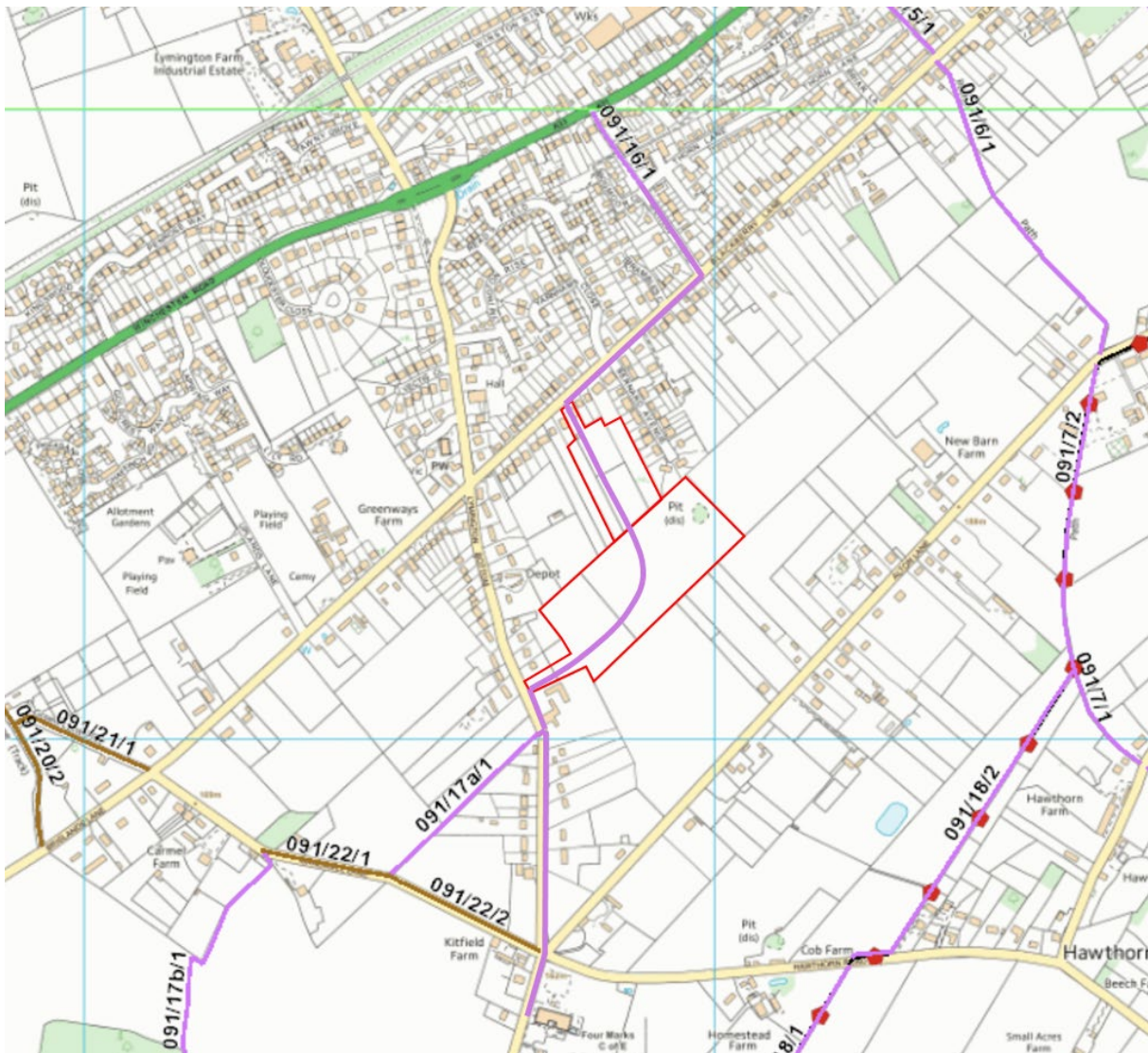


Figure 3: Position of the proposed site and the LAA Ref FM-015 site showing how the proposed connectivity would allow a pedestrian link between footpaths 16 and 17a, and also between the local primary school and the village

The proposed connectivity would provide a safer and more direct alternative walking route to the local primary school for a far greater number of users, avoiding the pavement running alongside Lymington Bottom. The proposed link would also open up a safer and more direct link from the village to longer recreational walks into the countryside.

Combined with the LAA Ref FM-015 site, the proposed site provides an opportunity to significantly improve sustainable transport provision in Four Marks.. The proposed site oresents an opportunity to improve connectivity within Four Marks and would help to achieve prioritisation of sustainable modes of transport, including active travel (walking and cycling). In addition, the proposed improved connectivity will deliver green connections and reduce the need for transport by car and therefore reduce carbon emissions.

The FMS2 site allocation consultation information document states that the LAA Ref FM-015 site scores above average in the Local Planning Authority's Accessibility Study. It is noteworthy that the LAA Ref FM-026 site scores higher than the LAA Ref FM-015 site in the Local Planning Authority's Accessibility Study. In comparison, vehicular access to the proposed site is direct to Lymington Bottom, located adjacent to the access to the LAA Ref FM-026 site, and should be assessed as being

equally accessible, if not more due to the location of the existing footpath on the eastern side of Lymington Bottom that directly links to the proposed site.

As such, the proposed site would contribute to minimising carbon emissions and contributing to achieving net zero carbon emissions and therefore should be considered as making a positive contribution to Objective 2, as confirmed with reference to Chapter 4: CLIM1 to CLIM5 and Chapter 8: DCG2 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, there is scope to support passive design principles and the installation of solar panels on the proposed site to help tackle the climate emergency and therefore the proposed site should be considered as making a positive contribution to Objective 2, as confirmed with reference to Chapter 4: CLIM1 to CLIM5 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.3 Objective 3 - To promote adaptation and resilience to climate change

Decision-making criteria:

- Ensure new developments are resilient and adaptable to the effects of climate change, including through the location, design and layout of new development
- Ensure developments do not impede, and where possible facilitate, the restoration of natural processes enabling biodiversity to adapt to and be resilient to climate change
- Avoid or reduce the risk of flooding for East Hampshire's population.

A Flood Risk Assessment has been submitted in support of application reference 52254, prepared by Ground and Water Ltd. Methods of keeping the flood risk to a minimum are recommended involving implementation of a Sustainable Urban Drainage Systems (SuDS).

As the proposed site is completely within a Flood Zone 1 and no flood models are available which show the proposed site being flooded from rivers and seas, no flood resistance measures, resilience measures and excavation routes are considered necessary.

A Combined Drainage Strategy Report has been submitted in support of application reference 52254, prepared by Nola Design Ltd.

The surface water drainage strategy demonstrates that that flood protection is capable of being improved after completion of new development on the proposed site compared with current conditions. The impact of overland flow which enters the proposed site from the northeast can be controlled and managed in an engineered manner to reduce flows and improve the present flooding in Lymington Bottom.

In order to ensure that flows generated by new development remain at or below pre-development levels, the required surface water discharge has been calculated for a 100-year return + 45% climate change. In order to demonstrate the robustness of the proposed surface water drainage design, a sensitivity analysis has been carried out using infiltration rates three times lower than the lowest recorded values.

Additional measures are envisaged to assist in improving flood protection in Four Marks that will cater for the 100 year + 45% event related to water inflow to the proposed development from outside of the proposed site and reduce the impact of exceedance flows by slowing down the flow of excess runoff in the case of an event that would exceed the 100 year + 45% level.

The proposals therefore promote adaptation and resilience to climate change by including sustainable drainage to manage flood risk.

The foul drainage strategy demonstrates that the existing sewer can be incorporated into new development. A 375dia foul sewer exists along Lymington Bottom. Branching off this is a 225dia foul sewer which extends across the proposed site and beyond in a north easterly direction. In the northern sector of the proposed site, a 150dia foul sewer branches off the 225dia and extends in a north westerly direction into land beyond the proposed site boundary.

The proposed surface and foul water drainage strategies demonstrate how an engineered and compliant solution to serve a new development can be achieved.

As such, the proposed site would contribute to minimising carbon emissions and contributing to achieving net zero carbon emissions and therefore should be considered as making a positive contribution to Objective 2, as confirmed with reference to Chapter 4: CLIM1 to CLIM5 and Chapter 8: DCG2 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, as described in section 4.2, the proposed site would contribute to resilience and adaptation to the effects of climate change through the location of the proposed site and therefore should be considered as making a positive contribution to Objective 3, as confirmed with reference to Chapter 4: CLIM1 to CLIM5 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, as described in Section 4.1 the proposed site would contribute to enabling biodiversity to adapt to and be resilient to climate change and therefore should be considered as making a positive contribution to Objective 3, as confirmed with reference to Chapter 5: NBE2 to NBE7 and NBE12 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.4 Objective 4 - To promote accessibility and create well-integrated communities

Decision-making criteria:

- Help to meet the changing needs of an ageing and growing population
- Help to integrate new residents with existing communities through inclusive design principles
- Improve accessibility to built facilities and services, and to useable formal, natural and/or seminatural open spaces, particularly in rural areas and the most deprived areas
- Ensure public facilities are accessibility enabled

Cumulative pressures of development on local infrastructure are proposed to be dealt with via CIL for allocated site LAA Ref FM-015.

The EHDC Community Facilities Study (2022) found notable absence of facilities in Four Marks in relation to the size of the village, and that the settlement no longer has all of the facilities it previously had, and which were required to justify its identification as a small local service centre.

In response to the EHDC Community Facilities Study, in addition to CIL contributions, the proposed site would contribute to providing opportunity for new and improved community facilities as the proposed site is capable of including provision for a new community facility/service area.

As such, and described in Section 4.2, the proposed site would improve accessibility to built facilities and services and therefore should be considered as making a positive contribution to Objective 4, as confirmed with reference to Chapter 7: HWC, Chapter 8: DCG1 to DCG4 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, as described in Section 4.2, there is an opportunity to improve the quality, safety and convenience of pedestrian/cycle routes in Four Marks by providing a good quality link that can be extended through the LAA Ref FM-015 site towards the centre of the village and towards the local primary school. This includes a proposed new walking/cycle link between BlackBerry Lane and Lymington Bottom, enabling footpath continuity between Footpath 16/1 and Footpath 17a/1 which would significantly improve sustainable transport provision in Four Marks.

5.5 Objective 5 - To actively promote health and wellbeing across East Hampshire and create safe communities free from crime

Decision-making criteria:

- Increase access to open space by connecting to and creating areas of publicly accessible open space which connect into the wider green / blue infrastructure network, particularly in the most deprived areas
- Support good accessibility to local food retail and medical facilities
- Support the physical and mental health of residents through the location and design of new development
- Help to tackle loneliness through socially inclusive design principles
- Minimise opportunities for criminal and anti-social behaviour and the fear of crime

A Transport Assessment (TA) submitted in support of application reference 52254, prepared by Highgate Transportation Ltd, demonstrates that the proposed site is sustainably located close to the primary school and local shops and amenities. Existing facilities in the local area are summarised in Table 2.1 of the TA, with approximate walking distances from the proposed site.

New development on the proposed site could provide pedestrian and cycle connections between the proposed site and other parts of the village, including a proposed new walking/cycle link between the allocated site on the LAA Reference FM-015 site and Lymington Bottom.

The proposed links between the proposed site, LAA Reference FM-015 and other parts of the village would promote sustainable social interaction by providing links to meeting and play areas as well as providing access to local facilities, including the local primary school, without the need to use the main road (A31) or main road junctions.

Figure 2.4 of the TA contains an isochrone map showing areas accessible on foot from the proposed site within 20 minutes. From this it can be seen that the vast majority of facilities in Four Marks, including the village centre, bus stops, and primary school, are well within a 20-minute walk from the proposed site.

Figure 2.6 of the TA contains an isochrone map showing areas accessible by cycle from the proposed site within 30 minutes. From this it can be seen that the vast majority of facilities in Four Marks, including the village centre, bus stops, and primary school, are within a 5-minute cycle of the proposed site, and that both Alton and Alresford are around a 30-minute cycle from the proposed site.

Pedestrian and cycle routes to key facilities from the proposed site are shown in Figure 2.7 of the TA.

Numerous everyday facilities are within easy walking or cycling distance from the proposed development, the routes to key local facilities are generally attractive and of good quality and the proposed site has good access to sustainable travel opportunities, including regular buses to the nearest towns and national railway station.

As such, and described in Section 4.2, the proposed site would improve accessibility to built facilities and services and therefore should be considered as an opportunity to significantly improve sustainable transport provision in Four Marks, making a positive contribution to Objective 5, as confirmed with reference to Chapter 7: HWC, Chapter 8: DCG1 to DCG4 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.6 Objective 6 - To strengthen the local economy and provide accessible jobs and skills development opportunities for local residents

Decision-making criteria:

- Provide additional opportunities for local employment and (access to) skills development, particularly in the most deprived areas
- Ensure a range of good quality employment sites are available to suit the needs of East Hampshire's businesses, particularly sites accommodating industrial floorspace and micro businesses
- Provide flexibly designed floorspace to support the needs of a range of economic sectors, given uncertainties over the potential impacts of AI
- Support agricultural jobs given the rural nature of the planning area
- Support the vitality and viability of existing and proposed town, local and neighbourhood centres

As described in Section 4.4, the proposed site would contribute to providing opportunity for new and improved community facilities. The proposed site would provide additional opportunities for local employment and therefore should be considered as making a positive contribution to Objective 6, as confirmed with reference to Chapter 10: E1 to E3 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.7 Objective 7 - To protect and enhance built and cultural heritage assets in the East Hampshire planning area

Decision-making criteria:

- Protect and enhance the significance and special interest of heritage assets and cultural heritage of East Hampshire and their contribution to local character.
- Promote understanding, appreciation and care of, and access to, heritage assets.

The proposed site does not directly or indirectly impact any heritage assets, there are no Conservation Areas in the immediate vicinity of the proposed site, and there is no inter-visibility between any Grade II Listed Buildings and the proposed site.

As such, the proposed site would contribute to protecting built heritage assets by avoiding impact and therefore should be considered as making a positive contribution to Objective 7, as confirmed

with reference to Chapter 5: NBE14 and Chapter 11: DM3 and DM4 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.8 Objective 8 - To provide good quality and sustainable housing for all

Decision-making criteria:

- Ensure residents have the opportunity to live in homes that meet their needs, including for affordable housing
- Ensure housing meets the needs of the population, including those of older residents and those with extra care requirements as well as other specialist provisions
- Provide a suitable housing mix and a range of tenure requirements
- Provide flexible and adaptable new homes

The proposed site is capable of providing a significant residential yield of up to 95 dwellings and is capable of providing a suitable housing mix and a range of tenure requirements with flexible and adaptable new homes to meet the needs of the population, including those of older residents and those with extra care requirements.

As such, the proposed site would contribute to providing good quality and sustainable housing, providing an opportunity to meet local housing needs (including over 90% smaller homes to meet demographic trends including provision for single story dwellings suitable for older and disabled people) and therefore should be considered as making a positive contribution to Objective 8, as confirmed with reference to Chapter 9: H1 to H3 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.9 Objective 9 - To conserve and enhance the character of the landscape and townscape

Decision-making criteria:

- Maintain and enhance the character of East Hampshire's rural landscapes and its settlements
- Respect the capacity of rural and edge-of-settlement landscapes to absorb new development
- Protect and enhance the setting of the South Downs National Park and the Surrey Hills AONB

The LAA Ref FM-015 site adjoins existing properties along two full sides of the perimeter, so is directly adjacent and in view of existing properties from 50% of the perimeter, whereas the proposed site has views from a far smaller proportion of the perimeter and better screening due to the larger proportion of existing perimeter hedgerows and trees.

The LAA Ref FM-015 site has existing dwellings along two full sides of the perimeter, so relatively far greater proximity to existing dwellings than the proposed site.

The proposed site and the FM-015 site are adjacent and the land follows the fall from the Blackberry Lane site towards the base of the valley within the proposed site. Overall, the proposed site is at a lower level and therefore less predominant.

No demolition is required to construct an appropriate access to the proposed site and access is direct to Lymington Bottom.

The detailed design of new development on the proposed site will be carried out to provide a residential density and appropriate design sympathetic to its immediate setting and the character of the village.

As such, the proposed site would contribute to conserving and enhancing the character of the landscape and therefore should be considered as making a positive contribution to Objective 9, as confirmed with reference to Chapter 5: NBE10 and NBE11 and Chapter 6: DES2 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.10 Objective 10 - To support efficient and the sustainable use of East Hampshire's natural resources

Decision-making criteria:

- Use land efficiently and minimise the loss of best and most versatile agricultural land
- Support sustainable water management, including minimising water consumption and supporting sustainable levels of abstraction
- Minimise use of new materials and prioritise reuse and recycling of materials
- Ensure extraction of mineral resources prior to development to avoid sterilisation of mineral resources

The LAA Ref FM-015 site and the proposed sites are identified as Grade 3 Agricultural Land Classification (ALC). The proposed site is currently a grazing field with no built structures and is unconstrained in environmental terms.

As described in Section 4.3, flood protection is capable of being improved after completion of new development on the proposed site compared with current conditions. The impact of overland flow which enters the proposed site from the northeast can be controlled and managed in an engineered manner to reduce flows and improve the present flooding in Lymington Bottom.

As described in Section 4.1, new development on the proposed site would retain and enhance the perimeter green infrastructure to form a significant landscape buffer to the perimeter of the proposed site. As well as maintaining the existing perimeter green infrastructure to mitigate visual impact on surrounding views, a biodiversity net gain of greater than 10% is achievable by providing enhanced green spaces with provision of wildlife areas and new tree and hedgerow planting.

As such, the proposed site would contribute to supporting the sustainable use of natural resources and therefore should be considered as making a positive contribution to Objective 10, as confirmed with reference to Chapter 5: NBE8 and NBE13 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.11 Objective 11 - To achieve sustainable water resource management and protect and improve water quality in the East Hampshire planning area

Decision-making criteria:

- Avoid or reduce the risk of flooding for East Hampshire's population
- Maintain and where possible improve water quality, and assist in meeting the requirements of River Basin Management Plans
- Protect groundwater, especially in the most sensitive areas (i.e. source protection zones)

As described in Section 4.3, a Flood Risk Assessment has been submitted in support of application reference 52254, prepared by Ground and Water Ltd. Methods of keeping the flood risk to a minimum are recommended involving implementation of a Sustainable Urban Drainage Systems (SuDS).

As the proposed site is completely within a Flood Zone 1 and no flood models are available which show the proposed site being flooded from rivers and seas, no flood resistance measures, resilience measures and excavation routes are considered necessary.

Hampshire County Council Drainage (Comment Date: Wed 03 Jan 2024) have commented on application Ref: 52254 that the proposed site is within Flood Zone 1 and is generally at very low risk of flooding. Hampshire County Council Drainage have also commented that *'at this site, infiltration testing was undertaken at depths of one to two metres below ground level, with useable infiltration rates recorded. Groundwater levels are understood to be quite deep at this location, and there should be no issues utilising shallow infiltration features for this development'*.

The LAA Ref FM-015 site and the proposed site are located within the same groundwater source protection zone (SPZ2). An initial desktop survey in support of application reference 52254 has shown that the proposed site is not within a catchment identified as containing designated sensitive estuarine or surface water sites, such as a Special Protection Area (SPA) or Special Area of Conservation (SAC), or their component Sites of Special Scientific Interest (SSSIs) which are in an unfavourable condition due to elevated nutrient levels and is therefore not subject to nutrient neutrality.

Flood protection is capable of being improved after completion of new development on the proposed site compared with current conditions. The impact of overland flow which enters the proposed site from the northeast can be controlled and managed in an engineered manner to reduce flows and reduce the present flooding risk in Lymington Bottom.

As such, the proposed development would contribute to managing flood risk and protecting groundwater and therefore should be considered as making a positive contribution to Objective 11, as confirmed with reference to Chapter 5: NBE7, NBE8, NBE9 and NBE13 of the East Hampshire Draft Local Plan Policies Assessment matrix (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

5.12 Objective 12 - To minimise air, noise and light pollution in the East Hampshire planning area

Decision-making criteria:

- Maintain and where possible improve air quality
- Limit contributions to noise pollution and reduce exposure to existing sources of pollution
- Limit and reduce light pollution across the East Hampshire planning area

The proposed site is not within 150m of any features that might serve as a noise source for new residents.

New development on the proposed site would consider proximity of noise sources, use of renewable energy to minimise air quality effects and sensitive lighting schemes to minimise lighting effects to nearby residents.

A Construction Environment Management Plan for the proposed site would ensure, as a minimum, site specific measures to control and monitor impact arising in relation to construction traffic, noise and vibration, dust and air pollutants, land contamination, ecology and ground water.

As such, the proposed development would contribute to managing flood risk and protecting groundwater and therefore should be considered as making a positive contribution to Objective 11, as confirmed with reference to Chapter 5: NBE13 and Chapter 11: DM13 of the East Hampshire Draft Local Plan Policies Assessment matrix (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

6 Summary

The proposed site offers significant opportunities in respect of the objectives for which negative impacts are assessed for other sites submitted for allocation in the Draft Local Plan. These opportunities are summarised below. In addition, the proposed site offers significant opportunities when directly compared to and combined with the adjacent allocated site LAA Ref FM-015. These opportunities are also summarised below.

The opportunities summarised below demonstrate that the proposed site is worthy of being allocated in the final version of the Local Plan.

6.1 Housing

The proposed site is capable of providing a significant residential yield of up to 95 dwellings (including over 90% smaller homes including provision for single story dwellings) so is capable of providing a suitable housing mix and a range of tenure requirements with flexible and adaptable new homes to meet demographic trends and the needs of the population, including those of older residents and those with extra care requirements.

As such, the proposed site would contribute to providing good quality and sustainable housing and therefore should be considered as making a positive contribution to Objective 8, as confirmed with reference to Chapter 9: H1 to H3 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, the proposed site would be designed to contribute to conserving and enhancing the character of the landscape and therefore should be considered as making a positive contribution to Objective 9, as confirmed with reference to Chapter 5: NBE10 and NBE11 and Chapter 6: DES2 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

6.2 Connectivity

There is an opportunity to improve the quality, safety and convenience of pedestrian/cycle routes in Four Marks by providing a good quality link that can be extended through the LAA Ref FM-015 site towards the centre of the village and towards the local primary school.

In addition, at present there is a lack of connection between village footpath 17a and village footpath 16 as can be seen from the annotated extract from the Map of public rights of way below.

An overlay demonstrating the position of the proposed site and the LAA Ref FM-015 site, shown in Section 4.2, shows how the proposed connectivity would allow a pedestrian link between footpaths 16 and 17a.

The proposed connectivity would provide a safer and more direct alternative walking route to the local primary school for a far greater number of users, avoiding the pavement running alongside Lymington Bottom. The proposed link would also open up a safer and more direct link from the village to longer recreational walks into the countryside.

Combined with the LAA Ref FM-015 site, the proposed site provides an opportunity to improve connectivity within Four Marks and would help to achieve prioritisation of sustainable modes of transport, including active travel (walking and cycling). In addition, the proposed improved

connectivity will deliver green connections and reduce the need for transport by car and therefore reduce carbon emissions.

As such, the proposed site would significantly improve sustainable transport provision in Four Marks and contribute to minimising carbon emissions and contributing to achieving net zero carbon emissions and therefore should be considered as making a positive contribution to Objective 2, as confirmed with reference to Chapter 4: CLIM1 to CLIM5 and Chapter 8: DCG2 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, and described in Section 4.2, the proposed site would improve accessibility to built facilities and services and therefore should be considered as making a positive contribution to Objective 5, as confirmed with reference to Chapter 7: HWC, Chapter 8: DCG1 to DCG4 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, the proposed development would contribute to managing flood risk and protecting groundwater and therefore should be considered as making a positive contribution to Objective 11, as confirmed with reference to Chapter 5: NBE7, NBE8, NBE9 and NBE13 of the East Hampshire Draft Local Plan Policies Assessment matrix (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

6.3 Accessibility to Community Facilities/Services

In response to the EHDC Community Facilities Study, in addition to CIL contributions, the proposed site would contribute to providing opportunity for new and improved community facilities as the proposed site is capable of including provision for a new community facility/service area.

As such, as described in Section 4.2, the proposed site would improve accessibility to built facilities and services and therefore should be considered as making a positive contribution to Objective 4, as confirmed with reference to Chapter 7: HWC, Chapter 8: DCG1 to DCG4 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, as described in Section 4.2, there is an opportunity to improve the quality, safety and convenience of pedestrian/cycle routes in Four Marks by providing a good quality link that can be extended through the LAA Ref FM-015 site towards the centre of the village and towards the local primary school. This includes a proposed new walking/cycle link between BlackBerry Lane and Lymington Bottom, enabling footpath continuity between Footpath 16/1 and Footpath 17a/1.

In addition, as described in Section 4.4, the proposed site would contribute to providing opportunity for new and improved community facilities. The proposed site would provide additional opportunities for local employment and therefore should be considered as making a positive contribution to Objective 6, as confirmed with reference to Chapter 10: E1 to E3 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

6.4 Flood Risk

As the proposed site is completely within a Flood Zone 1 and no flood models are available which show the proposed site being flooded from rivers and seas, no flood resistance measures, resilience measures and excavation routes are considered necessary.

Flood protection is capable of being improved after completion of new development on the proposed site compared with current conditions. The impact of overland flow which enters the proposed site from the northeast can be controlled and managed in an engineered manner to reduce flows and improve the present flooding in Lymington Bottom.

As such, the proposed site would contribute to minimising carbon emissions and contributing to achieving net zero carbon emissions and therefore should be considered as making a positive contribution to Objective 2, as confirmed with reference to Chapter 4: CLIM1 to CLIM5 and Chapter 8: DCG2 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, as described in section 4.2, the proposed site would contribute to resilience and adaptation to the effects of climate change through the location of the proposed site and therefore should be considered as making a positive contribution to Objective 3, as confirmed with reference to Chapter 4: CLIM1 to CLIM5 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, as described in Section 4.1 the proposed site would contribute to enabling biodiversity to adapt to and be resilient to climate change and therefore should be considered as making a positive contribution to Objective 3, as confirmed with reference to Chapter 5: NBE2 to NBE7 and NBE12 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

6.5 Biodiversity

New development on the proposed site would retain and enhance the perimeter green infrastructure to form a significant landscape buffer to the perimeter of the proposed site. As well as maintaining the existing perimeter green infrastructure to mitigate visual impact on surrounding views, a biodiversity net gain of greater than 10% is achievable by providing enhanced green spaces with provision of wildlife areas and new tree and hedgerow planting.

Hedgerows and trees on the proposed site boundaries are an important characteristic of the proposed site, helping to integrate it with the rural landscape to the south. The proposed site includes a greater number of hedgerows and trees on the proposed site boundaries when compared to the LAA Ref FM-015 site. This will help to integrate the proposed site with the adjacent rural landscape.

As such, the proposed site would contribute to protecting, enhancing and restoring biodiversity and geodiversity and therefore should be considered as making a positive contribution to Objective 1, as confirmed with reference to Chapter 5: NBE2 to NBE7 and NBE12 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

In addition, the proposed site would contribute to supporting the sustainable use of natural resources and therefore should be considered as making a positive contribution to Objective 10, as

confirmed with reference to Chapter 5: NBE8 and NBE13 of the East Hampshire Draft Local Plan Policies Assessment (Integrated Impact Assessment for the East Hampshire Local Plan, Appendix J).

7 Conclusion

The land to the rear of 87 Lymington Bottom, Four Marks, identified on Site Location Plan drawing number: 104-08 (Appendix A) (the proposed site) was submitted to East Hampshire District Council (EHDC) to be considered in the Land Availability Assessment on 26th May 2021.

An oversight/error by EHDC appears to have occurred as the proposed site has been included in the LAA as part of the Four Marks South (LAA/FM-031) site but not as an independent site.

Subsequently, the proposed site has not been considered independently for allocation by EHDC or considered independently as part of the Draft Local Plan documents including the Integrated Impact Assessment (IIA) for the East Hampshire Local Plan and the Draft Local Plan.

In response to East Hampshire District Council's (EHDC) call for sites, Leevan have updated the submission for the land identified on Site Location Plan drawing number: 104-08 (Appendix A) (the proposed site), for consideration for housing, employment and community use in the Land Availability Assessment (LAA).

There are no site-specific designations covering the proposed site, and no known environmental or technical constraints that would prevent the proposed site being allocated in the final version of the Local Plan.

Furthermore, the proposed site offers significant opportunities in respect of the objectives for which negative impacts are assessed for other sites submitted for allocation in the Draft Local Plan, as described above. In addition, the proposed site offers significant opportunities when directly compared to the other allocated sites, particularly when combined with the adjacent allocated site LAA Ref FM-015, as described above.

This document demonstrates that the proposed site should be allocated in the final version of East Hampshire District Council's Local Plan 2021 - 2040.

Appendix A

Site Location Plan

Appendix B

Land Availability Assessment Site Submission Form (prepared by Fredrick Adam, dated 26th
May 2021)

Appendix C

Supporting Report (prepared by Fredrick Adam, dated 26th May 2021)

Appendix D

Land Availability Assessment Site Submission Form (prepared by Leevan Ltd, dated 2nd
March 2024)

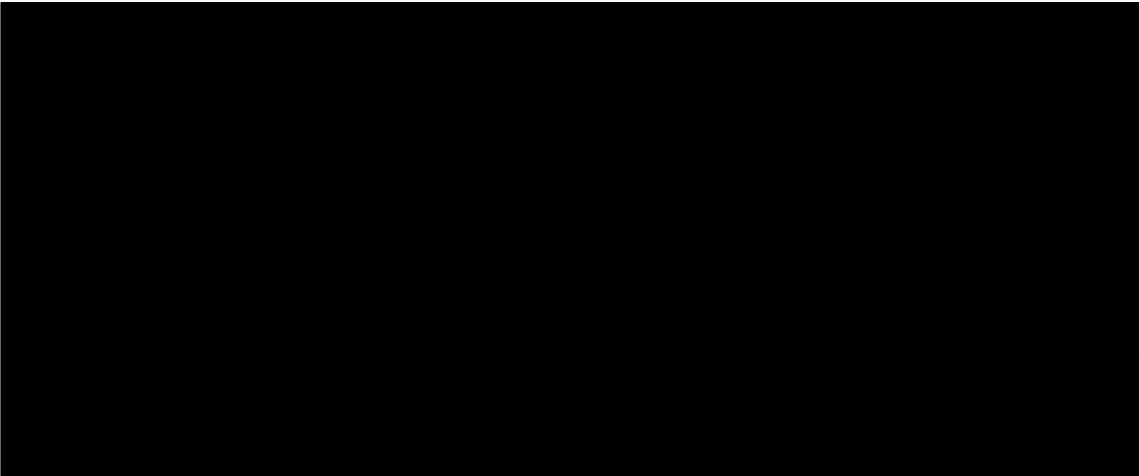


2nd March 2024.

Leevan Ltd Company No: 12428748

Dear Sir/Madam,

I can confirm that we have instructed Leevan Ltd to promote the site shown on drawing number FA-R19-05-A101 in the Land Availability Assessment."





2nd March 2024.

Dear Sir/Madam,

I can confirm that we have instructed Leevan Ltd to promote the site shown on drawing number FA-R19-05-A101 in the Land Availability Assessment."

Yours sincerely,





Official copy of register of title

Title number HP375430

Edition date 19.11.2020

- This official copy shows the entries in the register of title on 7 May 2021 at 10:24:24.
- 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 7 May 2021.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- For information about the register of title, see www.gov.uk/land-registry.
- This title is dealt with by HM Land Registry Durham Office.

A: Property register

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

HAMPSHIRE : EAST HAMPSHIRE

- 1 (01.02.1989) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Budgetts Farm, Lymington Bottom, Four Marks, Alton (GU34 5AH).
- 2 The mines and minerals at a depth greater than 60.96m (200 feet) from the surface are excepted.
- 3 The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.
- 4 The land has the benefit of the following rights reserved by the Transfer dated 27 September 1991 referred to in the Charges Register:-

"EXCEPT AND RESERVING the rights set out in the Second Schedule hereto

SECOND SCHEDULE

(Rights Reserved)

Rights for the Company and its successors in title the owners and occupiers for the time being of the whole or any part of the Retained Land and any relevant authority undertaker or service supply company or body concerned therewith and all or any persons or bodies nominated or authorised by any of the foregoing:

(a) to use the Service Installations comprised in the Property for the passage of water sewage gas electricity and other services from and to the Retained Land

(b) to keep in place any parts of any buildings on the Retained Land which



A: Property register continued

overhang and protrude into the Property

(c) of support and protection for any adjoining buildings from the Property and the Service Installations

(d) to enter upon the Property with or without workmen tools appliances machinery apparatus and materials as may be reasonably necessary for the purposes of:

(i) building laying inspecting repairing cleaning decorating renewing and maintaining any buildings on the Retained Land and the Service Installations comprised in the Property the person or persons exercising any such right causing as little inconvenience as practicable and making good all damage occasioned thereby

(ii) complying with any requirement of any relevant authority undertaker or service supply company or body concerned therewith

(iii) demolishing dismantling altering repositioning or removing the whole or any part or parts of any fences walls hedges trees shrubs plants or other vegetation buildings erections or any extension of any thereof or any trade or business items or any other items in relation to all or any of which there shall have occurred a breach of any of the covenants herein contained or

(iv) from time to time on not less than fourteen days previous notice in writing for the purpose of carrying out on the Retained Land and any building thereon any building works

the person or persons exercising such rights or any of such rights making good all damage thereby occasioned

(e) to construct the Road notwithstanding any interference with the exercise of the right of way over the Access granted to the Purchasers by this deed and

(f) all easements wayleaves licences rights and privileges granted or to be granted by the Company to any relevant authority undertaker or service supply company in connection with the services usually provided or maintained by them or any of them for the benefit and advantage of the Retained Land or any part or parts thereof.

The Service Installations All drains channels sewers pipes wires cables watercourses gutters and other conducting media now or within the Perpetuity Period constructed within the Property."

5 (19.11.2020) A new title plan based on the latest revision of the Ordnance Survey Map has been prepared.

6 (19.11.2020) The land has the benefit of any legal easements reserved by the Transfer dated 4 September 2020 referred to in the Charges Register but is subject to any rights that are granted by the said deed and affect the registered land.

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 (09.12.2009) PROPRIETOR: [REDACTED] of 87 Lymington Bottom, Four Marks, Alton, Hampshire GU34 5AH.
- 2 (09.12.2009) The price stated to have been paid on 2 December 2009 was £95,000.
- 3 (09.12.2009) A Deed dated 2 December 2009 made between (1) Jonathan Chater Green and Alison Lee Green and (2) Ideal Homes Midlands Limited contains purchasers' personal covenants.

NOTE: Copy filed.
- 4 (21.12.2009) RESTRICTION: No disposition of the registered estate by the proprietor of the registered estate is to be registered without a certificate signed by Ideal Homes Midlands Limited of Persimmon House, Fulford, York YO19 4FE or its conveyancer that the provisions of clause 2.3 of a Deed Of Covenant dated 2 December 2009 made between (1) Jonathan Chater Green and Alison Lee Green and (2) Ideal Homes Midlands Limited have been complied with.
- 5 (10.01.2017) RESTRICTION: No disposition by a sole proprietor of the registered estate (except a trust corporation) under which capital money arises is to be registered unless authorised by an order of the court.

C: Charges register

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

- 1 The land is subject to the following rights referred to in a Conveyance of the land in this title dated 19 April 1984 made between (1) John Merlin Coppelstone Hutchings (Vendor) and (2) Minnie Hutchings and Douglas Cyril Raymond Kellie (Purchaser):

"The property is sold subject to all rights of way, water, light, air, drainage and any other rights, easements or quasi-easements or over-riding interests defined by Section 70(i)(g) of the Land Registration Act 1925 and now used in on over or under the property hereby conveyed."

- 2 The land is subject to the following rights granted by a Transfer of the land edged and numbered HP435382 in green on the filed plan dated 27 September 1991 made between (1) Ideal Homes Midlands Limited (the Company) and (2) Ian Kennedy and Marie Kennedy (the Purchasers):-

"TOGETHER with the rights set out in the First Schedule hereto

FIRST SCHEDULE

(Rights Granted)

Rights for the Purchasers and their successors in title in common with the Company and all others entitled thereto:

(a) subject to the right of the Company to construct the Road a right of way with or without vehicles at all times and for all purposes over the Access to or from the Property from or to Lymington Bottom Road from the



C: Charges register continued

- 3 (19.11.2020) A Transfer of the land edged and numbered SH55437 in green on the title plan dated 4 September 2020 made between (1) Jonathan Chater Green and Alison Lee Green and (2) Leevan Limited contains restrictive covenants by the Transferor.

NOTE: Copy filed under SH55437.

End of register





Official copy of register of title

Title number SH55437

Edition date 19.11.2020

- This official copy shows the entries on the register of title on 30 Apr 2021 at 15:55:01.
- 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 30 Apr 2021.
- 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 (01.02.1989) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land at Budgetts Farm Lyminster Bottom, Four Marks, Alton (GU34 5AH).
- 2 The mines and minerals at a depth greater than 60.96m (200 feet) from the surface are excepted.
- 3 The land has the benefit of the following rights reserved by the Transfer dated 27 September 1991 referred to in the Charges Register:-

"EXCEPT AND RESERVING the rights set out in the Second Schedule hereto

SECOND SCHEDULE

(Rights Reserved)

Rights for the Company and its successors in title the owners and occupiers for the time being of the whole or any part of the Retained Land and any relevant authority undertaker or service supply company or body concerned therewith and all or any persons or bodies nominated or authorised by any of the foregoing:

(a) to use the Service Installations comprised in the Property for the passage of water sewage gas electricity and other services from and to the Retained Land

(b) to keep in place any parts of any buildings on the Retained Land which overhang and protrude into the Property

(c) of support and protection for any adjoining buildings from the Property and the Service Installations

(d) to enter upon the Property with or without workmen tools appliances machinery apparatus and materials as may be reasonably necessary for the purposes of:

(i) building laying inspecting repairing cleaning decorating renewing

A: Property Register continued

and maintaining any buildings on the Retained Land and the Service Installations comprised in the Property the person or persons exercising any such right causing as little inconvenience as practicable and making good all damage occasioned thereby

(ii) complying with any requirement of any relevant authority undertaker or service supply company or body concerned therewith

(iii) demolishing dismantling altering repositioning or removing the whole or any part or parts of any fences walls hedges trees shrubs plants or other vegetation buildings erections or any extension of any thereof or any trade or business items or any other items in relation to all or any of which there shall have occurred a breach of any of the covenants herein contained or

(iv) from time to time on not less than fourteen days previous notice in writing for the purpose of carrying out on the Retained Land and any building thereon any building works

the person or persons exercising such rights or any of such rights making good all damage thereby occasioned

(e) to construct the Road notwithstanding any interference with the exercise of the right of way over the Access granted to the Purchasers by this deed and

(f) all easements wayleaves licences rights and privileges granted or to be granted by the Company to any relevant authority undertaker or service supply company in connection with the services usually provided or maintained by them or any of them for the benefit and advantage of the Retained Land or any part or parts thereof.

The Service Installations All drains channels sewers pipes wires cables watercourses gutters and other conducting

media now or within the Perpetuity Period constructed within the Property."

NOTE 1: The land in this title forms part of the retained land referred to.

NOTE 2: The Access referred to is shown tinted blue on the title plan.

- 4 (19.11.2020) The land has the benefit of any legal easements granted by Transfer dated 4 September 2020 referred to in the Charges Register but is subject to any rights that are reserved by the said deed and affect the registered land.
- 5 (19.11.2020) The Transfer dated 4 September 2020 referred to in the Charges Register contains a provision relating to the creation and/or passing of easements.

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 (19.11.2020) PROPRIETOR: [REDACTED] of Creaky Cottage, 87 Lymington Bottom, Four Marks, Alton GU34 5AH.
- 2 (19.11.2020) The price stated to have been paid on 4 September 2020 was £54,000.

C: Charges Register

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

- 1 The land is subject to the following rights referred to in a Conveyance of the land in this title and other land dated 19 April 1984 made

C: Charges Register continued

between (1) John Merlin Copplestone Hutchings (Vendor) and (2) Minnie Hutchings and Douglas Cyril Raymond Kellie (Purchaser):

"The property is sold subject to all rights of way, water, light, air, drainage and any other rights, easements or quasi-easements or over-riding interests defined by Section 70(i)(g) of the Land Registration Act 1925 and now used in on over or under the property hereby conveyed."

- 2 The land is subject to the following rights granted by a Transfer of 87 Lymington Bottom dated 27 September 1991 made between (1) Ideal Homes Midlands Limited (the Company) and (2) Ian Kennedy and Marie Kennedy (the Purchasers):-

"TOGETHER with the rights set out in the First Schedule hereto

FIRST SCHEDULE

(Rights Granted)

Rights for the Purchasers and their successors in title in common with the Company and all others entitled thereto:

(a) subject to the right of the Company to construct the Road a right of way with or without vehicles at all times and for all purposes over the Access to or from the Property from or to Lymington Bottom Road from the date of this deed until terminated in accordance with paragraph (a) of the Fourth Schedule hereto but if not terminated within the Perpetuity Period for ever

(b) a right of way with or without vehicles over the Road to or from the Property from or to Lymington Bottom Road from the date of the termination of the right of way granted in paragraph (a) of the First Schedule until adoption of the Road

(c) subject to the right of the Company to construct the Road a right of free and uninterrupted passage and running of water and sewage to and from the Property through the drains to be laid by the Purchaser in the approximate position indicated by a broken brown line on the Plan from the date on which those drains are laid until terminated in accordance with paragraph (b) of the Fourth Schedule hereto but if not terminated within the Perpetuity Period for ever

(d) a right of free and uninterrupted passage and running of water and sewage to and from the Property through drains to be laid by the Purchaser in such positions in the Retained Land as the Company shall designate from the date of termination of the right of drainage granted in paragraph (c) of this First Schedule until adoption and

(e) a right to enter on the Retained Land with or without workmen materials and specialist services for the purposes of constructing the Access and laying the drains referred to in paragraph (c) and (d) of this First Schedule and for the purposes of repairing maintaining renewing relaying or removing the same the person exercising such rights causing as little damage and inconvenience as reasonably practicable in so doing and making good immediately any damage caused.

FOURTH SCHEDULE

Agreements and Declarations

(a) The Company may at any time up to 1 year before the expiry of the Perpetuity Period serve notice on the Purchaser to terminate (1) the right of way over the Access granted by paragraph (a) of the First Schedule hereto provided the Road has been constructed to base course level and permits vehicular access to the Property and (2) the right of drainage granted by paragraph (c) of the First Schedule hereto if the Company shall require that either or both the drains indicated by a broken brown line on the Plan shall be removed and a new drain or

C: Charges Register continued

drains laid under the Retained Land in such position or positions as shall be designated by the Company

(b) nothing herein contained shall prevent the construction of the Road by the Company

The Road
the

A road constructed by the Company on
land edged blue on the Plan

The Perpetuity Period
day

The period of 80 years from the 1st
of January 1991."

NOTE 1: The land edged blue referred to adjoins the southern boundary of the land transferred.

NOTE 2: The access referred to is shown tinted blue on the title plan.

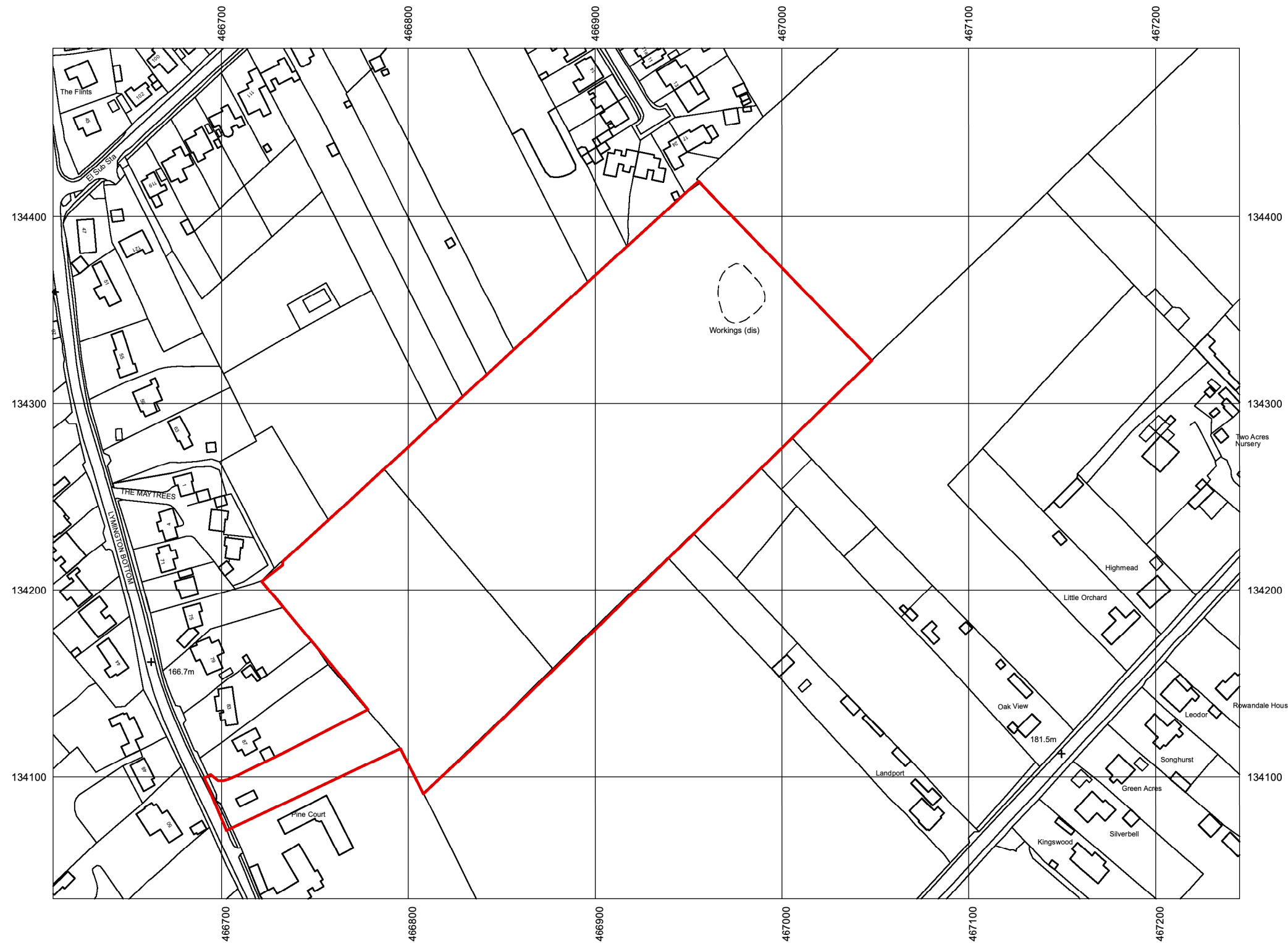
NOTE 3: The drain indicated by a brown broken line referred to is shown by a blue broken line on the title plan in so far as it affects the land in this title.


NOTE 4: The land in this title forms part of the retained land referred to.

- 3 (19.11.2020) A Transfer of the land in this title dated 4 September 2020 made between (1) Jonathan Chater Green and Alison Lee Green and (2) Leevan Limited contains restrictive covenants.

NOTE: Copy filed.

End of register



Key:
 Site boundary

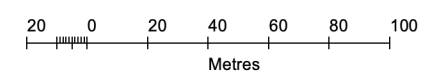
87 Lymington Bottom Four Marks, Alton Hampshire

Site Location

Dwg Number: 104-08
 Scale: 1:2,500 @ A3
 Date: October 2023
 Issue: Planning



Ibbotson Studios Ltd
 Evans Way, Chipping Norton, Oxon OX7 5RZ
 07717 518008 office@ibbotsonstudios.com



Production Date: 19 July 2023

Top Left: 466610 134490 Bottom Right: 467245 134035

© Crown copyright and database rights 2023 Ordnance Survey OS100035409.

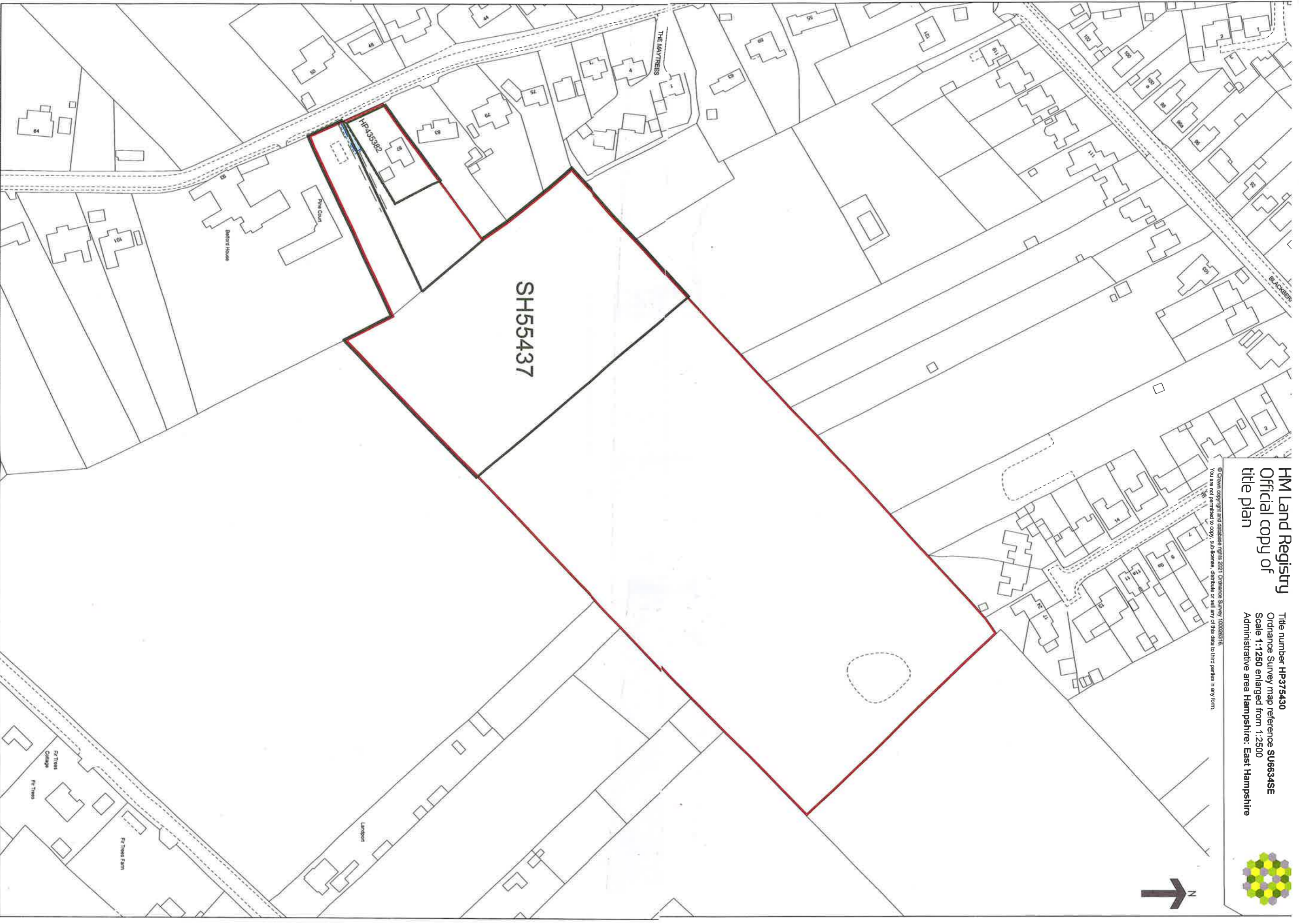
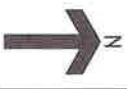
Reproduction in whole or in part is prohibited without the permission of Ordnance Survey

HM Land Registry
Official copy of
title plan

Title number HP375430
Ordnance Survey map reference SU6634SE
Scale 1:1250 enlarged from 1:2500
Administrative area Hampshire: East Hampshire



© Crown copyright and database right 2021 Ordnance Survey 100065316
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.



This official copy issued on 7 May 2021 shows the state of this title plan on 7 May 2021 at 10:24:24.
It is admissible in evidence to the same extent as the original (s 67 Land Registration Act 2002).
This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.
This title is dealt with by HM Land Registry, Durham Office.

Our ref: 2023068/SM

Your ref:

01 03 2024

Mr A Harvey
Planning Policy Manager, Planning Policy
East Hampshire District Council
Penns Place, Petersfield, GU31 4EX

Dear Adam,

EAST HAMPSHIRE EMERGING LOCAL PLAN AND LAND AVAILABILITY 2024

Further to the ongoing consultations and the site at Neatham Down we are aware of the Local Authority's interest in moving the site forward into the land allocation scheme and that it is included in the new draft local plan for 2024. For the avoidance of doubt, the land at Neatham Down remains available for development.

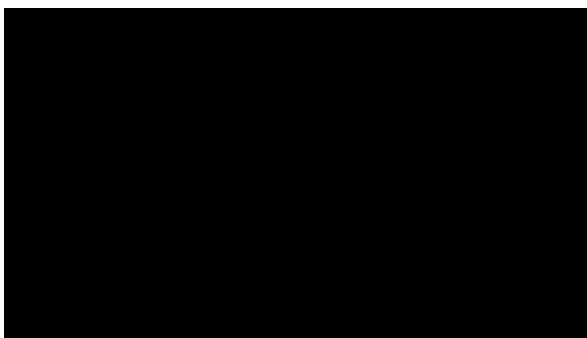
As such, the sites promoted and included in the current East Hampshire Land Availability Assessment (LAA) 2022 and 2023 should continue to form part of the Council's supply of land for future development. These sites are:

- LAA/BIN-009 – Land at Neatham Manor Farm
- LAA/BIN-010 – Land at Neatham Manor Farm
- LAA/BIN-011 – Land at Neatham Manor Farm

As previously stated the sites are well placed to provide a large-scale strategic residential development, complete with associated infrastructure. Delivery of LAA/BIN-009, LAA/BIN-010 and LAA/BIN-011 can be undertaken within a 5-10 year plan. There are no impediments to the delivery of these sites as they all fall under a single ownership, comprising 99 hectares out of the overall single control of the Neatham Estate totalling approximately 650 Hectares. We ask that the authority takes note of all previous documents submitted.

It has come to our attention that there has been some public interest in the site during this stage of the consultation although we note too that in the previous iterations of the Call for Sites there were no comments lodge regarding Neatham Down. As discussed, we are preparing further supporting information which will be provided later this spring / early summer to align with the currently published time timetable for publication of the consultation responses.

Regards,



7 Siskin Gate Bracknell Berkshire RG12 8BF
T: 01344 481204 M: 07900 278483 E: mat@matplan.co.uk W: www.matplan.co.uk

BY EMAIL ONLY TO localplan@easthants.gov.uk

28 February 2024

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

Our ref: 1108

Your ref:

Dear Sirs

Reg. 18 Draft Local Plan 2021-2040 – Representations by [REDACTED] to the Policies Map for Kingsley, in respect of Land to the North of the B3004 Main Road, Kingsley

I have been instructed by [REDACTED] to make representations to the Policies Map for Kingsley as contained in the Reg. 18 Draft East Hampshire Local Plan 2021-2040, in respect of land in my client's ownership to the north of the B3004 Main Road in Kingsley. This letter sets out the scope and detail of my client's representations to the Reg. 18 Draft Local Plan and the Modifications that my client requests are made to the Draft Local Plan's Policies Map for Kingsley in light of the same.

Scope of Objections to the Reg. 18 Draft Local Plan

My client owns land to the north of the B3004 Main Road in Kingsley, as edged by the blue line shown on the Google Earth extract at Fig. 1 below:



Fig. 1 Google Earth Extract Showing Objection Site Edged by a Blue Line



Land edged by the red line shown on Fig. 1 above used to be owned by my client and has been developed with two detached dwellings. My client notes that the Interim Settlement Policy Boundary Background Paper published in January 2024 to support the Reg. 18 Draft Local Plan proposes to include this land within Kingsley’s Settlement Policy Boundary (SPB) – as per no. 9 on the plan for Kingsley in the enclosed extract from the Background Paper - which is shown by the yellow line on Fig. 1 above. This SPB revision is carried over onto the Reg. 18 Draft Local Plan’s Polices Map for Kingsley, as enclosed. My client **supports** this revision to Kingsley’s SPB.

My client retains a right of access from the land edged by the red line on Fig. 1 above to the land edged by the blue line on Fig. 1 above. It will be seen that the latter is arbitrarily bisected by the SPB shown on the Reg. 18 Draft Local Plan’s Polices Map for Kingsley – this part of Kingsley’s SPB does not follow any discernible or defensible feature on the ground, whereas the northern, western and southern boundaries of the land edged by the blue line on Fig. 1 above are strongly defined by fences, hedges, trees and other mature screening vegetation, which serve to contain the land and closely relate it to the two houses that have been constructed on land directly to the east. Accordingly, my client **objects** to this part of Kingsley’s SPB and requests that it is revised to follow the blue line shown on Fig. 1 above – the detail of my client’s objections is set out in the following paragraphs of this letter.

Detail of Representations to the Reg. 18 Draft Local Plan

Settlement Policy Boundaries (SPBs) are a tool used to set a firm, defensible and logical demarcation between urban areas and the countryside. As such, it is good practice for SPBs to follow clearly defined natural and manmade features ‘on the ground’, such as hedgelines and woodland; fences and other means of enclosure; and roads, railways and rivers, to produce SPBs that will endure for the long term. The alternative is SPBs that are illogical and ill-defined; and which are susceptible to pressure to change.

The Reg. 18 Draft Local Plan offers the opportunity to revise Kingsley’s SPB to follow clearly defined, logical and defensible features on the ground. The land contained by the blue line shown on Fig. 1 above is strongly contained by fences, hedges, trees and other mature screening vegetation; and its close physical and visual relationship with the two houses constructed on land to the east means that it should be included within a logical revision of Kingsley’s SPB that can be defended in the long term.

As per Fig. 2 below, a revision of Kingsley’s SPB as described above could yield a single dwelling, which would make a small yet important contribution to the District’s housing needs:

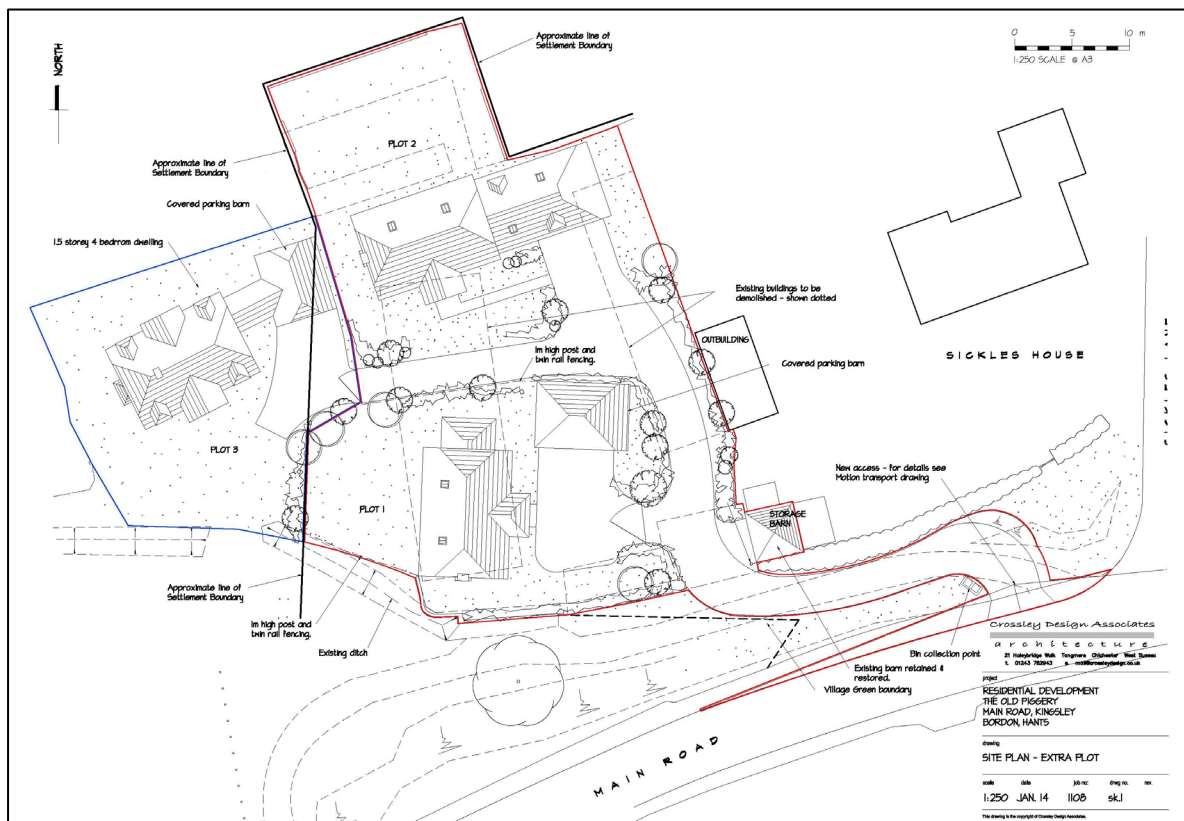


Fig. 2 Layout Plan Showing a Detached Dwelling Accommodated on the Objection Site

Scope of Modifications to the Reg. 18 Draft Local Plan

In light of the representations set out above, my client requests that the Reg. 18 Draft Local Plan's Policies Map for Kingsley is modified, so that the village's SPB follows the yellow and blue lines shown in Fig. 3 below:

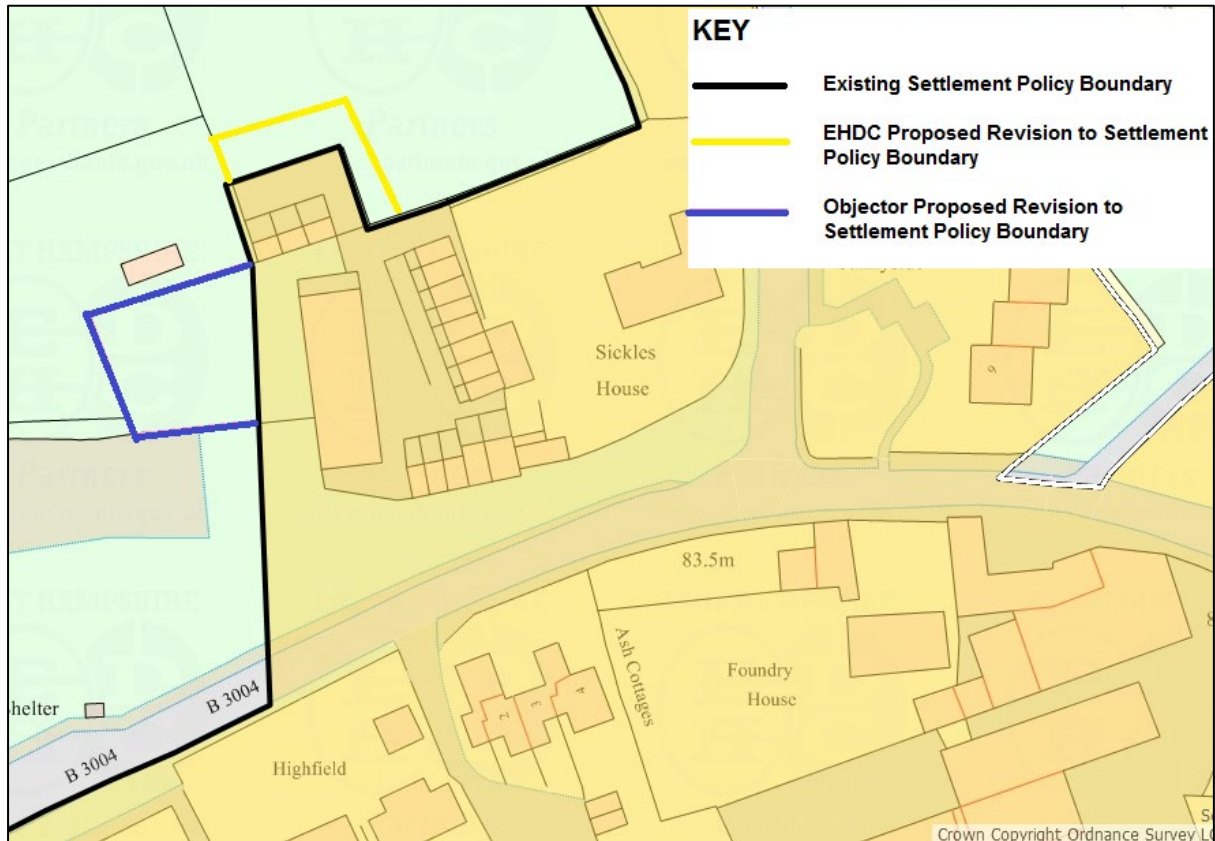


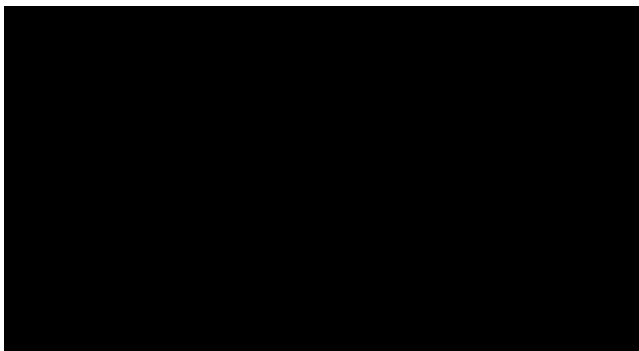
Fig. 3 Plan Showing Revisions to Kingsley's Settlement Policy Boundary

Concluding Comments

I hope you will find this letter and the enclosed helpful and will agree to modify the Reg. 18 Draft Local Plan to include the revisions to Kingsley's SPB shown in Fig. 3 above. I will look forward to hearing from you in this respect; and to receiving further updates regarding the Draft Local Plan in due course.

In the meantime, please contact me if you have any queries or require further information at this stage.

Yours faithfully
for MatPlan Limited



Draft Local Plan 2021-2040 (Regulation 18)

Interim Settlement Policy Boundary Review Background Paper

January 2024



OUR
**LOCAL
PLAN**

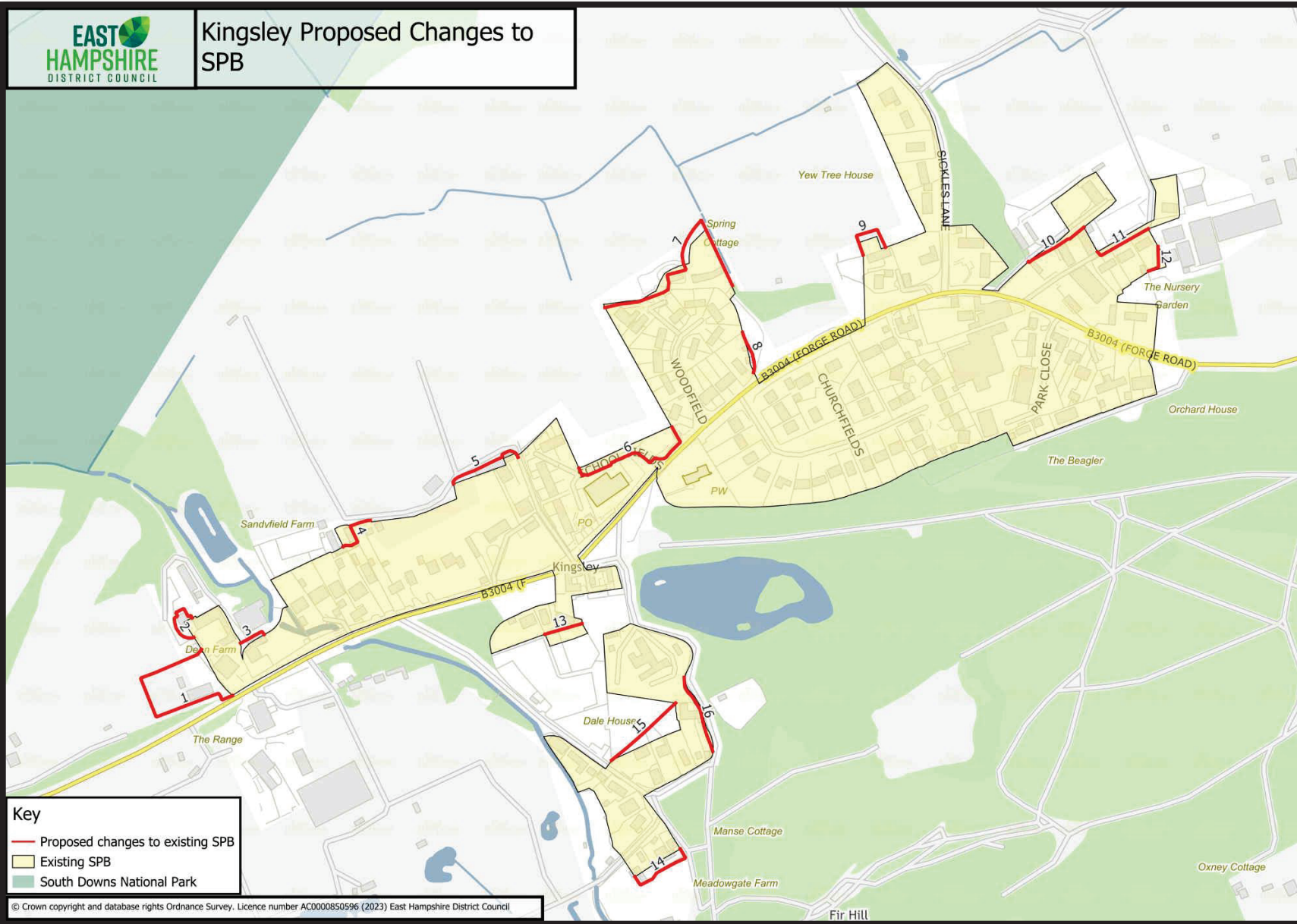
2021-2040

CONSULTATION

22 JANUARY - 4 MARCH 2024

Kingsley					
Map Ref	Location / Description	Criteria / Principle	Consideration / Recommendation	Action	Evidence
1	Land adjacent to Dean Farm Cottage	1, 2a	Land adjacent to Dean Farm Cottage is in employment use and is physically, functionally and visually related to the existing urban area.	Redraw boundary to include land adjacent to Dean Farm Cottage along a defined feature.	Aerial, Mapping, Site Visit
2	Land at Dean Farm Cottage	1, 2b	Boundary cuts through buildings of Dean Farm Cottage. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw boundary to include buildings along built form.	Aerial, Mapping, Site Visit, planning app: 24117/020
3	Land at Dean Farm	1, 2b	Boundary cuts through buildings of Dean Farm. The buildings are closely related to the character of the built form.	Redraw boundary to include buildings along built form.	Aerial, Mapping, Site Visit
4	Land rear of Sandyfield Farm	3h	The building is in agricultural use. It is both physically and visually detached from the settlement.	Redraw boundary to exclude farm building.	Aerial, Mapping, Site Visit
5	Land rear of The Old Rectory	1, 2b	Boundary cuts through building at Haydens Yard. The buildings are closely related to the character of the built form.	Redraw boundary to include buildings along built form.	Aerial, Mapping, Site Visit
6	School Fields	1	Where boundaries run along road they should be drawn along the edge closest to settlement.	Redraw the boundary along the opposite side of the road.	Aerial, Mapping, Site Visit
7	Land rear of Woodfield and Spring Cottage	1, 2b	The boundary cuts through countryside and should follow the built form. Boundary cuts through garden of Spring Cottage. The curtilage of the property is closely related to the character of the built form and have enclosing features.	Redraw the boundary to exclude the countryside, include built form and include garden of Spring Cottage.	Aerial, Mapping
8	Land at the Old Police House	1, 2b	Boundary cuts through garden of the Old Police House. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping, Site Visit
9	Land at The Old Piggery, Main Road	1, 2b	Boundary cuts through garden of the Old Piggery. The curtilage of the property is closely related to the	Redraw boundary to include gardens along defined feature.	Aerial, Mapping, Site Visit

			character of the built form and have enclosing features.		
10	Old Park Farmhouse	3b	Old Park Farm House is physically and visually detached from the remainder of the settlement.	Redraw boundary to exclude Old Park Farm House.	Aerial, Mapping, Site Visit
11	Old Park Farm	1, 3b	Old Park Farm is physically and visually detached from the remainder of the settlement.	Redraw boundary to exclude Old Park Farm.	Aerial, Mapping, Site Visit
12	Garden rear of 3 Old Park Farm, Forge Road	1, 2b	Boundary includes farm land rear of property.	Redraw boundary to exclude farm land rear of 3 Old Park farm.	Aerial, Mapping
13	Land rear of Faldonside and Devonboro House	3c	Boundary cuts through gardens of Faldonside and Devonboro House. The curtilages of the properties relate more to the character of the countryside than built form and therefore the boundary should follow neighbouring properties.	Redraw the boundary to exclude gardens to align with neighbouring properties.	Aerial, Mapping
14	Land at Birch Cottage and Meadowgate Farm	1, 2b	Boundary cuts through gardens of Birch Cottage and Meadowgate Farm. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping, Site Visit, planning app: 30903/004
15	Land rear of Rose Folly, Hillside View and Prospect Cottage	2b	Boundary cuts through gardens of Rose Folly, Hillside View and Prospect Cottage. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping, Site Visit
16	Land at Rose Cottages	1	Where boundaries run along road they should be drawn along the edge closest to settlement.	Redraw the boundary along the opposite side of the road.	Aerial, Mapping, Site Visit



Key

- Proposed changes to existing SPB
- Existing SPB
- South Downs National Park

© Crown copyright and database rights Ordnance Survey. Licence number AC0000850596 (2023) East Hampshire District Council

Draft Local Plan 2021-2040 (Regulation 18) Policies Maps

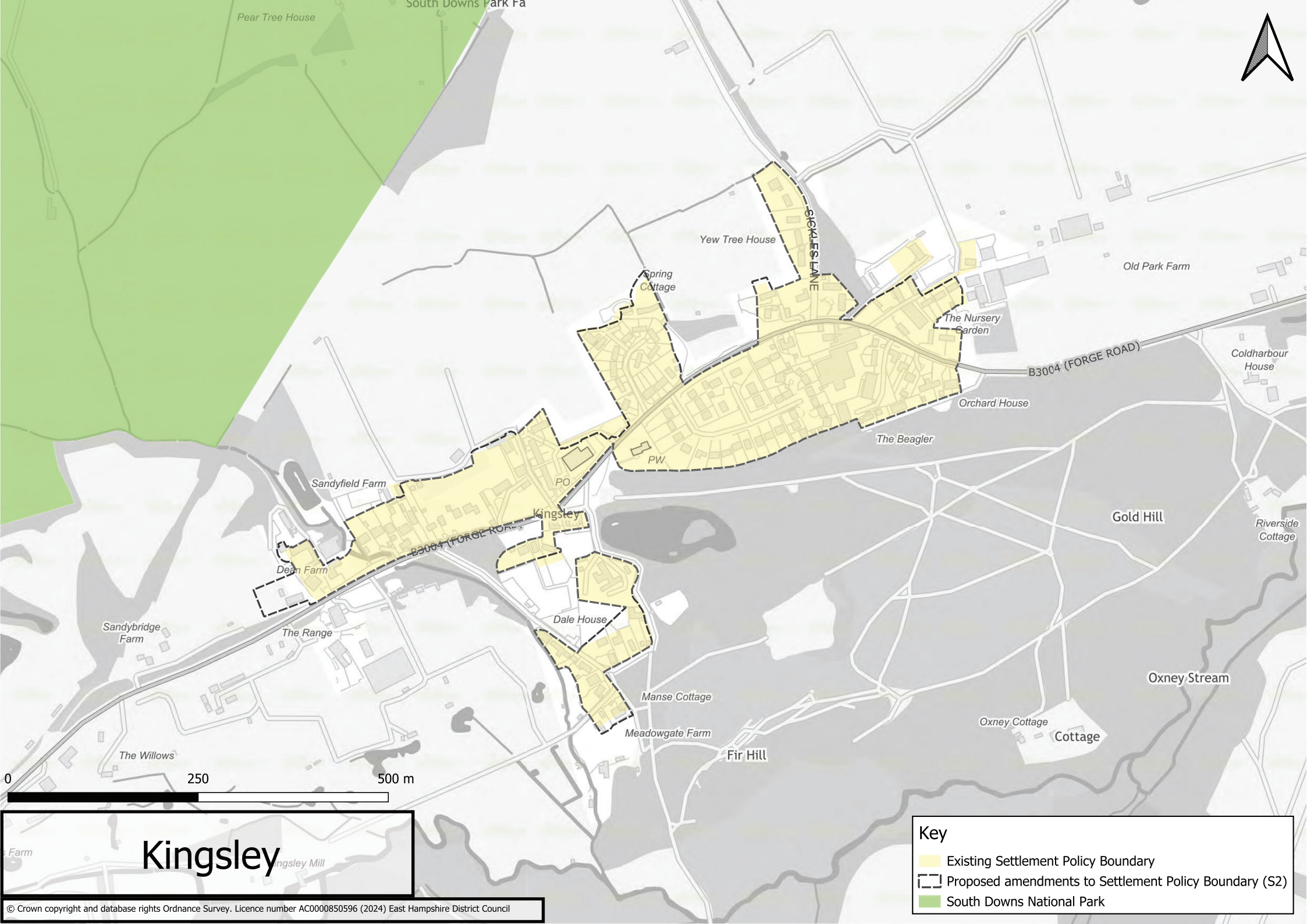


OUR
**LOCAL
PLAN**

2021-2040

CONSULTATION

22 JANUARY - 4 MARCH 2024



Kingsley

Key

- Existing Settlement Policy Boundary
- Proposed amendments to Settlement Policy Boundary (S2)
- South Downs National Park

7 Siskin Gate Bracknell Berkshire RG12 8BF
 T: 01344 481204 M: 07900 278483 E: mat@matplan.co.uk W: www.matplan.co.uk

BY EMAIL ONLY TO localplan@easthants.gov.uk

29 February 2024

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

Our ref: 0901

Your ref:

Dear Sirs

Reg. 18 Draft East Hampshire Local Plan 2021-2040 – Representations for Briarsgate Homes, relating to Housing Allocation BWH1, Land Adjacent to Glebe Field, Bentworth

I act for Briarsgate Homes and write to make representations to the Reg. 18 Draft East Hampshire Local Plan 2021-2040, relating to land in my client’s control adjacent to Glebe Field, Bentworth, which is proposed as a housing allocation for 5 dwellings under Policy BWH1.

The terms of housing allocation BWH1 are set out on pages 458 to 460 of the Reg. 18 Draft Local Plan; and it is shown on the Policies Map for Bentworth, reproduced in Fig. 1 below:

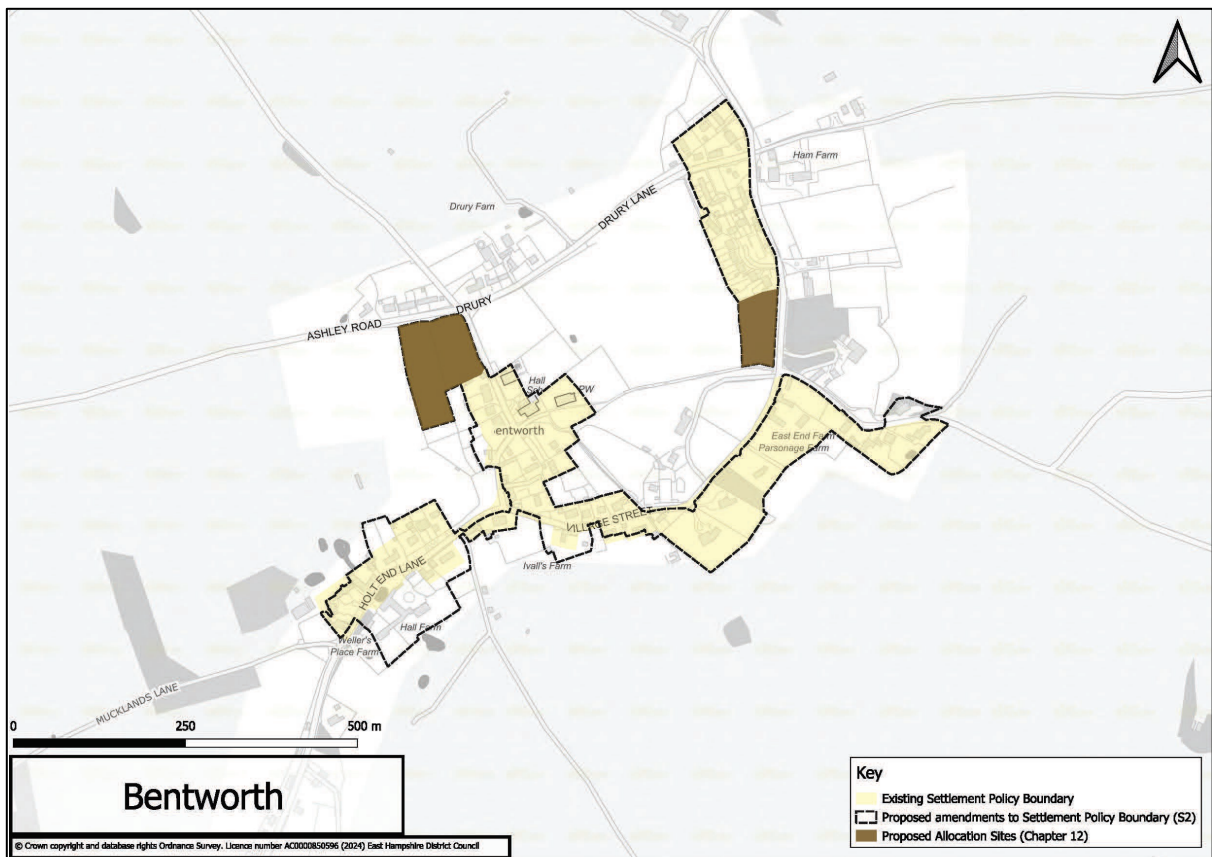


Fig. 1 Reg. 18 Draft Local Plan’s Policies Map for Bentworth



Detail of Representations to the Reg. 18 Draft Local Plan

My client strongly **supports** housing allocation BWH1 – the site is suitable, available and deliverable without constraints; and my client is committed to working with your Authority to deliver the site’s development in a timely manner. Indeed, my client concluded a Pre-application Enquiry ref. 60094/999 in June 2023 with your colleagues in Development Control, agreeing in principle a proposal to develop allocation BWH1 with 6 dwellings; and since December 2023, I have been engaged with a planning application ref. 60094 for the allocation’s development with 6 dwellings. This planning application was submitted in response to the housing land supply deficit which your Authority’s October 2023 Five-Year Housing Land Supply Statement and its January 2024 Addendum identify in the part of the District outside the South Downs National Park.

Reproduced as Figs. 2 and 3 below are the Site Plan and Street Elevation that are currently the subject of negotiations with the Case Officer for application ref. 60094 for the development of allocation BWH1:



Fig. 2 Site Plan for Planning Application Ref. 60094 to Develop Allocation BWH1 with 6 Dwellings

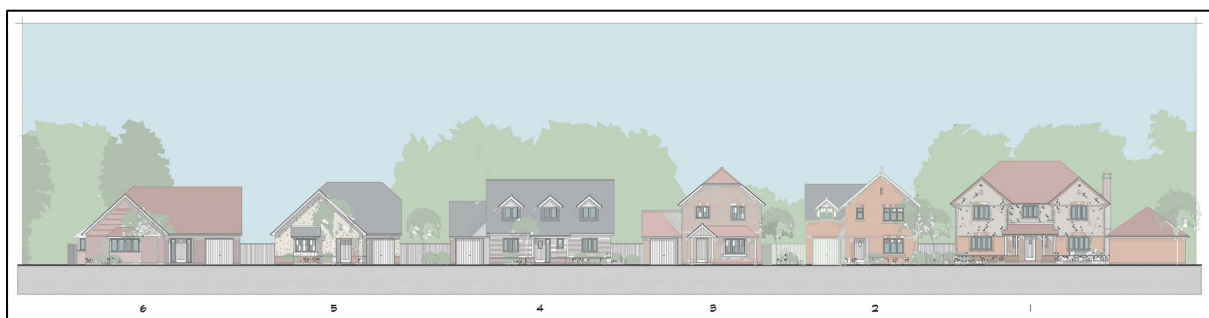


Fig. 3 Street Elevation for Planning Application Ref. 60094 to Develop Allocation BWH1 with 6 Dwellings

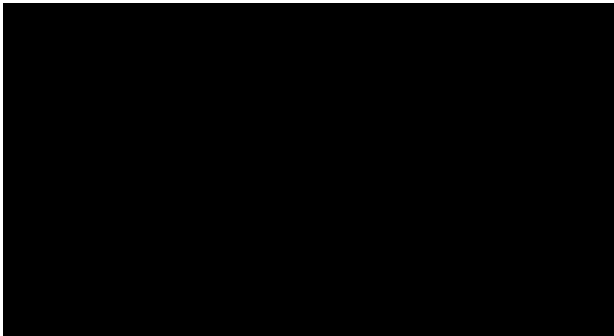
Planning application ref. 60094 seeks a grant of full planning permission for the allocation's development and as such, is accompanied by a suite of detailed application plans and other detailed plans and written submissions relating to highways; arboriculture, ecology and landscaping; and foul and surface water drainage. A Biodiversity Net Gain Assessment has also been submitted and demonstrates that the Biodiversity Net Gain required as a consequence of the allocation's development as proposed can be delivered on-site. In short, there are no technical, legal or other constraints that will delay or otherwise prevent the allocation's timely delivery.

Concluding Comments

I hope you will find this letter helpful and will look forward to receiving further updates regarding the Draft Local Plan in due course. In the meantime, please contact me if you have any queries or require further information at this stage.

Yours faithfully

for MatPlan Limited



7 Siskin Gate Bracknell Berkshire RG12 8BF
 T: 01344 481204 M: 07900 278483 E: mat@matplan.co.uk W: www.matplan.co.uk

BY EMAIL ONLY TO localplan@easthants.gov.uk

29 February 2024

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

Our ref: 0901

Your ref:

Dear Sirs

Reg. 18 Draft East Hampshire Local Plan 2021-2040 – Representations for Hooper Properties, relating to Housing Allocation RLC3, at Oaklands House, Rowlands Castle

I act for Hooper Properties and write to make representations to the Reg. 18 Draft East Hampshire Local Plan 2021-2040, relating to land in my client’s ownership at Oaklands House, Rowlands Castle, which is proposed as a housing allocation for 51 dwellings under Policy RLC3.

The terms of housing allocation RLC3 are set out on pages 445 to 447 of the Reg. 18 Draft Local Plan; and it is shown on the Policies Map for Rowlands Castle, reproduced in Fig. 1 below:

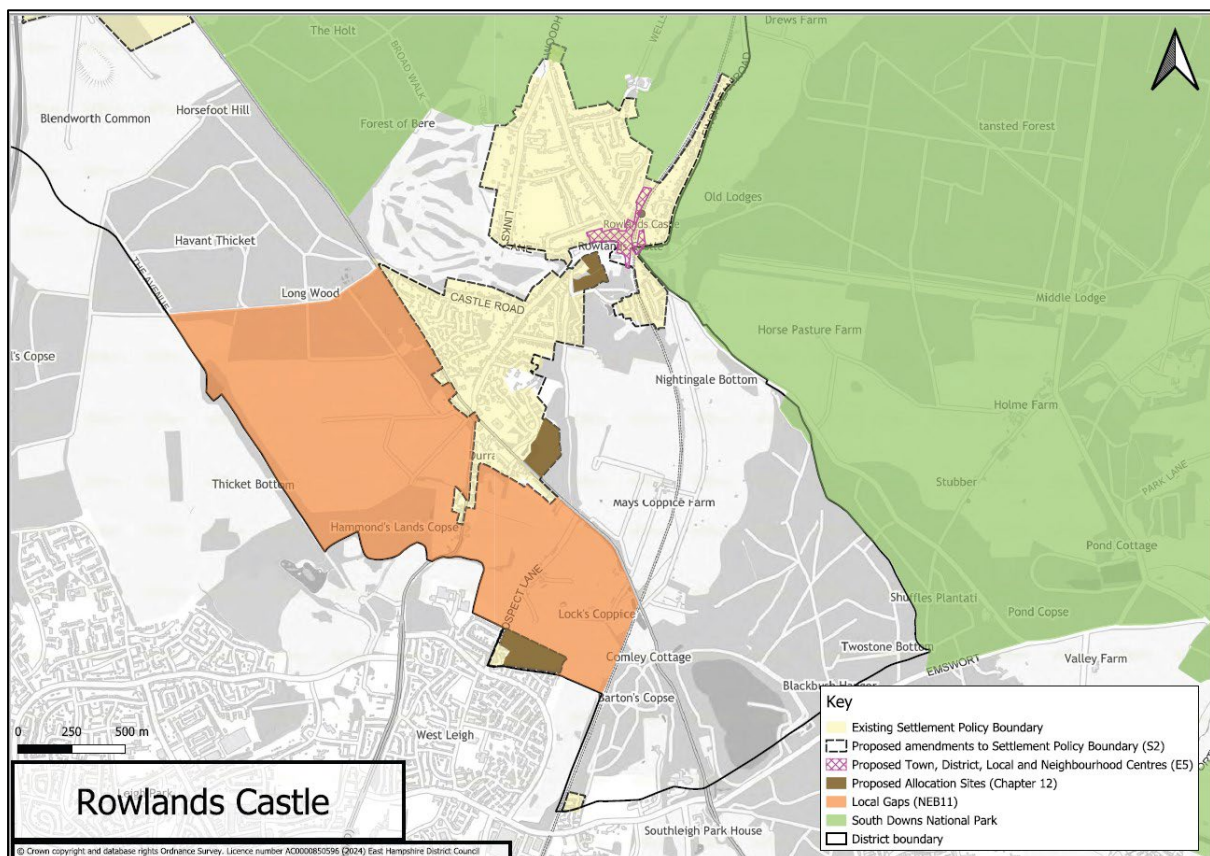


Fig. 1 Reg. 18 Draft Local Plan’s Policies Map for Rowlands Castle



Detail of Representations to the Reg. 18 Draft Local Plan

My client strongly **supports** housing allocation RLC3 – the site is suitable, available and deliverable without constraints; and my client is committed to working with your Authority to deliver the site’s development in a timely manner. Indeed, my client concluded a Pre-application Enquiry ref. 61057/999 in early October 2023 with your colleagues in Development Control, agreeing in principle a proposal to develop allocation RLC3 with 35 dwellings, including 14 affordable homes; and since then, I have been co-ordinating the preparation of an outline planning application for the allocation’s development. This outline planning application will soon be submitted to your Authority, in response to the housing land supply deficit which your Authority’s January 2024 Addendum to the October 2023 Five-Year Housing Land Supply Statement identifies in the part of the District outside the South Downs National Park.

Reproduced as Fig. 2 below is the Landscape Masterplan that will be submitted to support the outline planning application to develop allocation RLC3 with 35 dwellings:



Fig. 2 Landscape Masterplan to Support the Development of Allocation RLC3 with 35 Dwellings

It will be noted that the area proposed for the allocation's development with housing integrates with woodland identified as Protected Open Space 'Woodlands Avenue 1' on Map 12 of the 2023 Rowlands Castle Neighbourhood Plan, reproduced in Fig. 3 below:



Fig. 3 Map 12 from the 2023 Rowlands Castle Neighbourhood Plan – Protected Open Space

Furthermore, it should be noted that approximately 0.7ha of grassland also owned to my client to the north of allocation RLC3 will be made available to help deliver the Biodiversity Net Gain (BNG) required to support the allocation's development with 35 dwellings. Fig. 4 below shows the location of this area of grassland, outlined in green, in relation to housing allocation RLC3:



Fig. 4 Area of Grassland to Deliver Biodiversity Net Gain to Support Housing Allocation RLC3

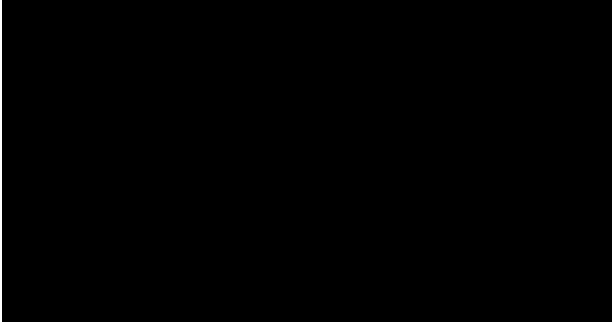
Finally, it should be noted that my client has secured the requisite Nitrate Credits to offset the development of allocation RLC3 with 35 dwellings – in short, there are no technical, legal or other constraints that will delay or otherwise prevent the allocation’s timely delivery.

Concluding Comments

I hope you will find this letter helpful and will look forward to receiving further updates regarding the Draft Local Plan in due course. In the meantime, please contact me if you have any queries or require further information at this stage.

Yours faithfully


for MatPlan Limited



Reg. 18 East Hampshire District Local Plan 2021-2040 - Public Consultation - Land at Woodview Place & Timbers, Boyneswood Road, Medstead

Tue 27/02/2024 20:37

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

 1 attachments (11 MB)

winmail.dat;

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

Dear Sirs,

I act for the owners of the adjoining houses known as Woodview Place and Timbers, on Boyneswood Road in Medstead, as outlined in red on the attached Google Earth extract; and have been instructed to lodge representations to the Reg. 18 East Hampshire District Local Plan 2021-2040 in respect of the proposed revision to Four Marks' and Medstead's Settlement Policy Boundary (SPB) in this location. These representations are set out in the following paragraphs of this email.

Site Description

My clients' land comprises their houses, known as Woodview Place (to the north) and Timbers (to the south) and their domestic curtilages to the east, with associated development (tarmac tennis courts, a swimming pool and suchlike); and open paddock land associated with the properties beyond. The site as a whole tapers to the east and is contained by a densely wooded cutting along the Watercress Steam Railway to the south, a substantial block of dense woodland to the east and by existing housing on Boyneswood Road and Holland Drive to the west and north respectively. In particular, the densely wooded cutting along the Watercress Steam Railway directly to the south and the substantial block of dense woodland directly to the east comprise firm and defensible boundaries 'on the ground', which contain the site and other development in Medstead to the north and west.

Local Plan Representations

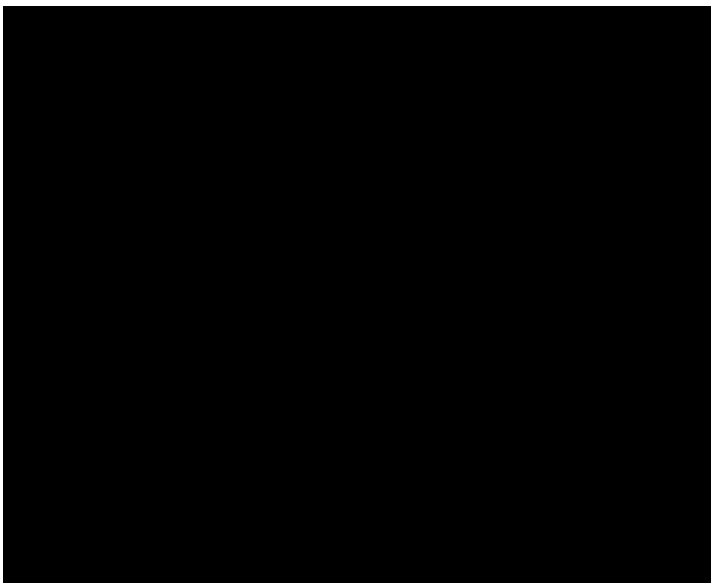
Settlement Policy Boundaries (SPBs) are a tool used to set a firm, defensible and logical demarcation between urban areas and the countryside. As such, it is good practice for SPBs to follow clearly defined natural and manmade features 'on the ground', such as hedgelines, woodland and rivers; and roads and railways, to produce SPBs that will endure for the long term. The alternative is SPBs that are illogical and which 'lack proper planning'; and which become susceptible to pressure to change.

Currently, my clients' land at Woodview Place and Timbers is excluded from Medstead's SPB, as per the attached screenshot from your Authority's online mapping resource. Given their land's strong containment by natural and other features, as described above, my clients are very pleased to note that the Interim Settlement Policy Boundary Background Paper published in January 2024 to support the Reg. 18 Local Plan proposes a SPB revision to include their land within Four Mark's SPB – as per no. 12 on the plan for South Medstead in the attached extract from the Background Paper. This SPB revision is carried over onto the Reg. 18 Local Plan's Polices Map for Four Marks, as per the attached. My clients support this revision – it will set the most logical and defensible demarcation between Four Marks' and South Medstead's urban area and the countryside in this location, contingent with the densely wooded cutting along the Watercress Steam Railway to the south and the substantial block of dense woodland to the east, 'rounding off' Four Marks' and South Medstead's SPB in this location.

Conclusions

I would be grateful if you could confirm safe receipt of this email and the attached and hope my clients' representations supporting the Reg. 18 Local Plan are helpful. Please contact me if you have any queries or require further information at this stage, otherwise, I would be grateful if you could keep me updated with the Reg. 18 Local Plan's progress from this point onwards.

Yours faithfully,



This email is confidential and may contain privileged information. It is intended only for use of the intended recipient. If you have received it by mistake, please notify the author by replying to this email or telephone (01344-481204). If you are not the intended recipient, you must not print, copy, amend, distribute or disclose it to anyone else or rely on the contents of this email, and you should DELETE it from your system. You should check this email and any attachments for viruses, as no responsibility can be taken for any virus which may be transferred by this email. Thank you.



My House

My Maps

Woodview Place, Boyneswood Road, Medstead, Alton, GU34 5DY

Find

Reset

- + Planning 0/8
- Planning Policy 1/32
- Article 4
- Article 4 - Employment to Residential Use
- CP8 Town and Village Facilities and Services
-  CP10 Settlement Policy Boundary
- 
- CP19 Development in the Countryside
- CP22 Internationally Designated Sites
- CP23 Gaps Between Settlements
- H1 Baseline Housing Allocations
- H2 Reserve Housing Allocations
- H9 Areas of Special Housing Character
- H10 Special Housing Areas
- IB1 Industrial Business Land Allocations



- OS B&W
- OS Colour
- APGB Aerial

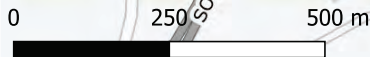
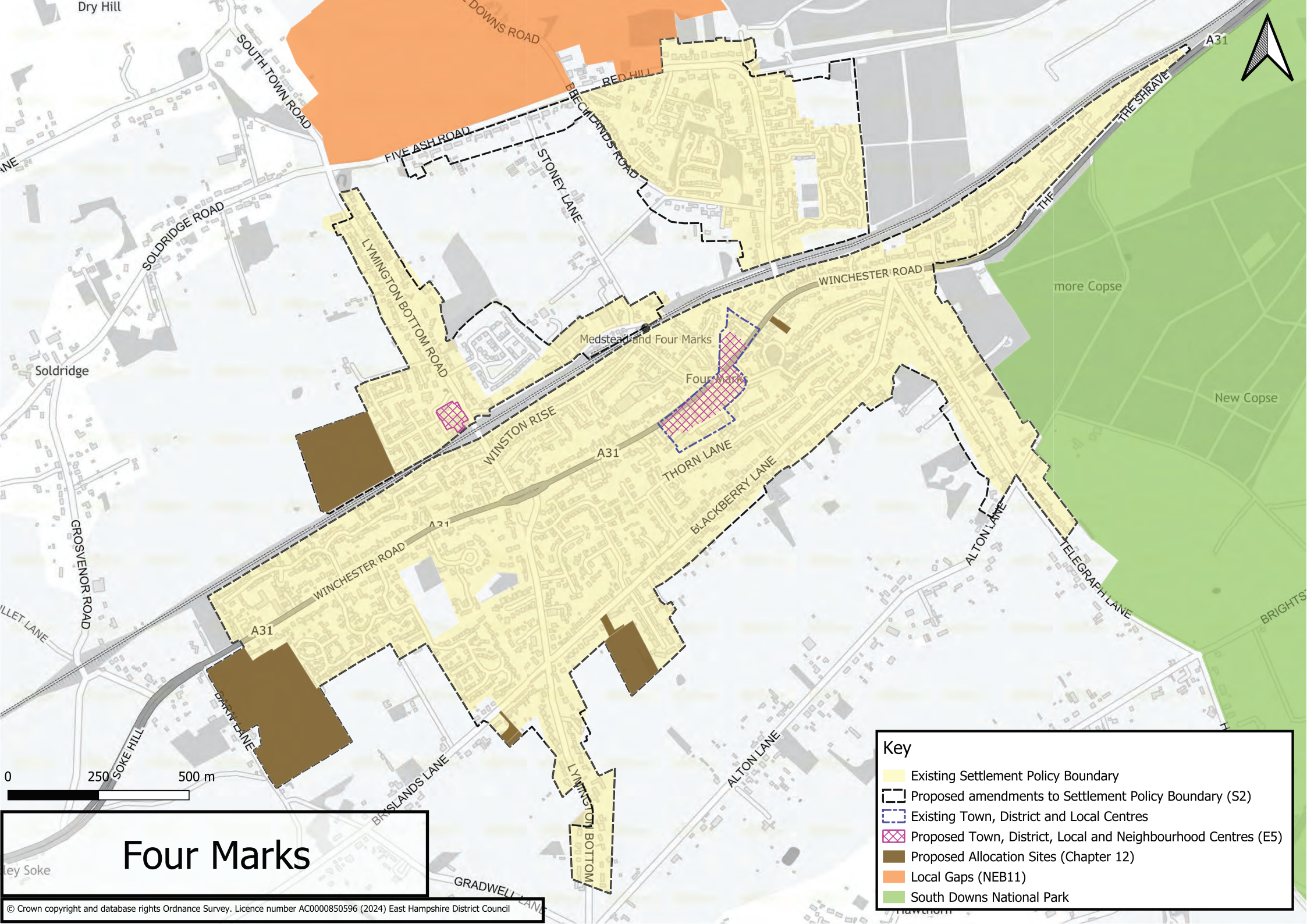
Land at Woodview Place & Timbers, Boyneswood Road, Medstead

Legend
🔴 Site Boundary



Draft Local Plan 2021-2040 (Regulation 18) Policies Maps





Four Marks

- Key**
- Existing Settlement Policy Boundary
 - Proposed amendments to Settlement Policy Boundary (S2)
 - Existing Town, District and Local Centres
 - Proposed Town, District, Local and Neighbourhood Centres (E5)
 - Proposed Allocation Sites (Chapter 12)
 - Local Gaps (NEB11)
 - South Downs National Park

Draft Local Plan 2021-2040 (Regulation 18)

Interim Settlement Policy Boundary Review Background Paper

January 2024



Four Marks and South Medstead					
Map Ref	Location / Description	Criteria / Principle	Consideration / Recommendation	Action	Evidence
Four Marks					
1	Garden of Lonely Place, The Shrave	1, 2b	Boundary cuts through garden of Lonely Place, The Shrave. The curtilage of the property is closely related to the character of the built form and has enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping
2	Gardens rear of 2-9 Woodlark Place	1, 2b	Boundary cuts through gardens of 2-9 Woodlark Place. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping
3	Gardens rear of 6-10 Oakhurst Drive	1, 2b	Boundary cuts through gardens of 6-10 Oakhurst Drive. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping
4	Gardens rear of properties on A31 (Foxhill, Forest Way, Bramley House)	1, 2b	Boundary cuts through gardens of properties along the A31. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping
5	The Shrave	1	Where boundaries run along road they should be drawn along the edge closest to the settlement.	Redraw boundary along the opposite side of the road.	Aerial, Mapping, Site Visit
6	Oak Lodge and Oak Park	2b	Oak Lodge and Oak Park are physically and visually attached to the existing urban area.	Redraw boundary to include properties along defined feature.	Aerial, Mapping, Site Visit
7	Gardens rear of properties on Telegraph Lane	1, 2b	Boundary currently cuts through gardens along Telegraph Lane in an ad-hoc manor. Where possible and to maintain continuity, exceptionally long gardens will follow the boundaries of adjacent properties with smaller curtilages (52-58 Telegraph Lane).	Redraw boundary to include gardens along defined feature and to align with 52-58 Telegraph Lane.	Aerial, Mapping
8	Gardens rear of 24-28 Telegraph Lane	1, 2b	Boundary cuts through gardens of 24-28 Telegraph Lane. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping

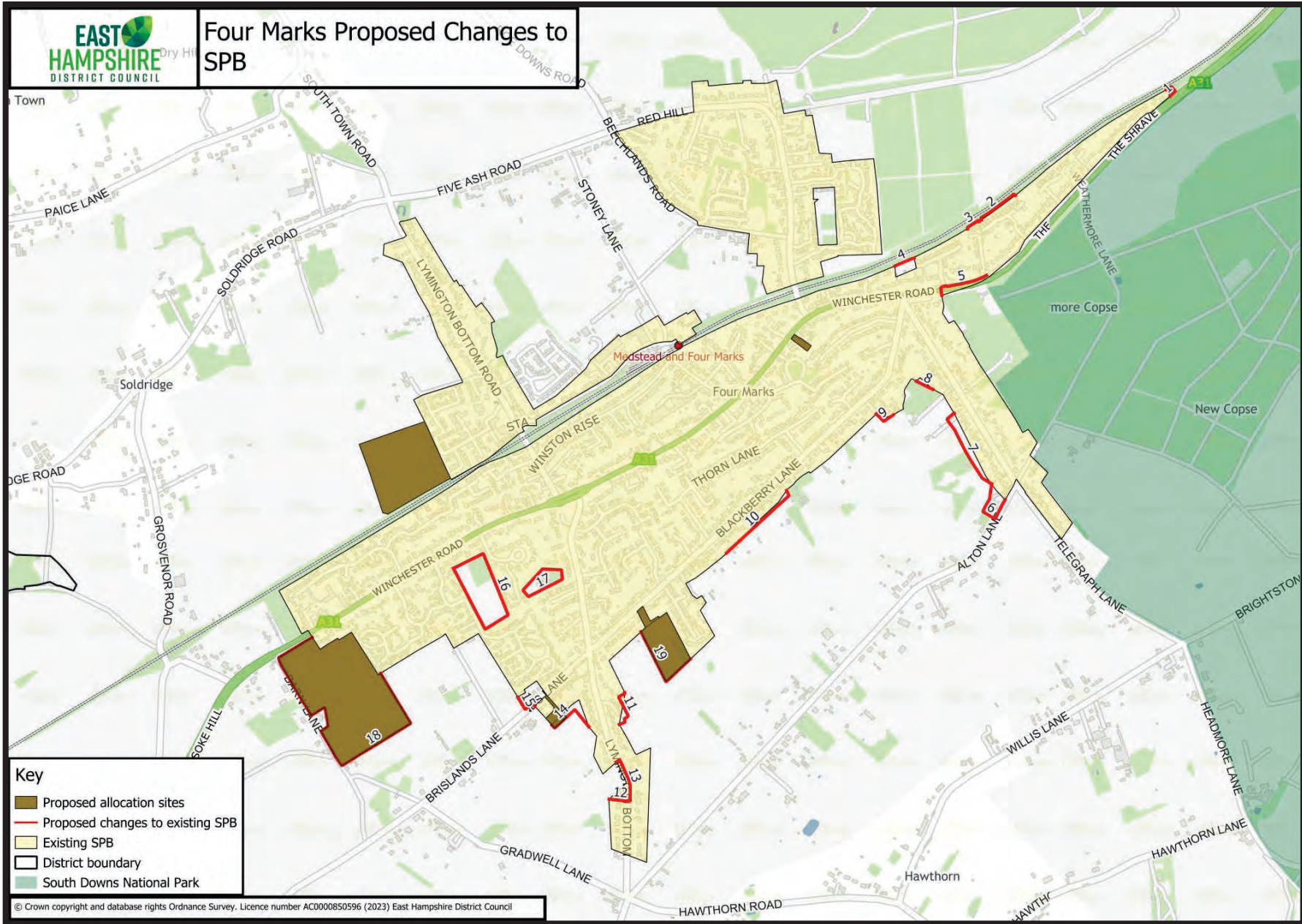
9	Garden of 1 Wild Wood	1, 2a, 2b	Boundary cuts through garden of 1 Wild Wood. The curtilage of the property is closely related to the character of the built form and has enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping, Site Visit, Application info (51818/002)
10	Gardens rear of Blackberry Lane	3c	Boundary currently cuts through gardens along Blackberry Lane in an ad-hoc manor. Where possible and to maintain continuity, exceptionally long gardens will follow the boundaries of adjacent properties with smaller curtilages (73-75 Blackberry Lane)	Redraw boundary to align with the curtilages of 73-75 Blackberry Lane.	Aerial, Mapping
11	Land to rear of Maytrees, Lymington Bottom Road	1, 2b	Boundary cuts through garden of 71 Lymington Bottom Road. The curtilages of the property are closely related to the character of the built form and have enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping
12	Land adjacent to 64 Lymington Bottom Road	3a	Area of open space on the edge of the built form should be excluded from the settlement.	Redraw boundary to exclude open space on the edge of settlement.	Aerial, Mapping, Site Visit
13	Lymington Bottom Road	1	Where boundaries run along road they should be drawn along the edge closest to the settlement.	Redraw boundary along the opposite side of the road.	Aerial, Mapping, Site Visit
14	Gardens rear of Lymington Bottom Road and Brislands Lane	1, 2b	Boundary cuts through gardens of properties along Lymington Bottom Road and Brislands Lane. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping
15	Greenways, The Oaks, Green Trees, Wisteria, Brislands Lane	2b	Properties along Brislands Lane are physically and visually attached to the existing urban area.	Redraw boundary to include properties along defined feature.	Aerial, Mapping, Site Visit
16	Land to rear of 131 Winchester Road	1, 2d	The area of land represents a small-scale development opportunity which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area. The Inspectors Report (30800/10) accepted the site does not fulfil a countryside function.	Redraw the boundary to include the area of land.	Aerial, Mapping, Site Visit, Application info (30800/10)
17	Land south of 4 and 5 Gloucester Close	1, 2a	Application (50334/001) was permitted to designate the area of land as open space. The designated open space forms part of the settlement.	Redraw the boundary to include the area of land.	Aerial, Mapping, Site Visit, Application info (50334/001)

18	Land south of Winchester Road	2c	Land allocated in the Draft Local Plan for approximately 100 dwellings.	Redraw boundary to include allocated site.	Aerial, Mapping, Draft Local Plan
19	Land rear of 97-103 Blackberry Lane	2c	Land allocated in the Draft Local Plan for approximately 20 dwellings.	Redraw boundary to include allocated site.	Aerial, Mapping, Draft Local Plan
South Medstead					
1	Telephone Exchange, Lymington Bottom Road	3h	Public utilities on the edge of a settlement should be exclude.	Redraw boundary to exclude the telephone exchange.	Aerial, Mapping, Site Visit
2	Lymington Bottom Road	1	Where boundaries run along road they should be drawn along the edge closest to the settlement.	Redraw boundary along the opposite side of the road.	Aerial, Mapping, Site Visit
3	Gardens rear of 62-70 Lymington Bottom Road	3c	Boundary currently cuts through gardens along Lymington Bottom Road in an ad-hoc manner. Where possible and to maintain continuity, exceptionally long gardens will follow the boundaries of adjacent properties with smaller curtilages (1 Kingsley Drive).	Redraw boundary to align with the curtilages of 1 Kingsley Drive.	Aerial, Mapping
4	Land east of 20-38 Lymington Bottom Road	2a	Planning permission granted for 75 dwellings (55197/001)	Redraw boundary to include planning permission.	Aerial, Mapping, Site Visit, Application Info (55197/001)
5	Land at Station Approach	1, 2b	The train station, associated buildings and their curtilages are closely related to the character of the built form and have enclosing features.	Redraw boundaries to include the train station, associated buildings and their curtilages.	Aerial, Mapping, Site Visit
6	Land rear of Stonebridge and Station House, Stoney Lane	3h	Equestrian development should be excluded and boundary extends beyond the curtilage of Station House.	Redraw boundary to exclude the equestrian uses to the east of Stonebridge, Stony Lane and exclude the land beyond the curtilage of Station House.	Aerial, Mapping, Application info (21149/008)
7	Land rear of Athelstan House and The Haven, Boyneswood Road	3h	Agricultural land should be excluded from the settlement.	Redraw boundary to exclude agricultural land and align with curtilage of Athelsten House.	Aerial, Mapping

8	Land at Boyneswood Lane	1, 2a, 2b, 3c	Properties along Boyneswood Lane are physically and visually attached to the existing urban area. Where possible and to maintain continuity, exceptionally long gardens will follow the boundaries of adjacent properties with smaller curtilages (Merrydown & Penilee).	Redraw boundary to include properties on Boyneswood Lane along defined features, where this has not been possible boundary drawn to align with smaller adjacent curtilages.	Aerial, Mapping, Site Visit, Application info (25099/015)
9	Properties along Five Ash Road	1, 2b, 3c, 4	Properties along Five Ash Road are physically and visually attached to the existing urban area. Where possible and to maintain continuity, exceptionally long gardens will follow the boundaries of adjacent properties with smaller curtilages (Ryecroft and Wayside in the east/Rumah Kita and Kalka in the west).	Redraw boundary to include properties on Five Ash Road along defined features, where this has not been possible boundary drawn to align with smaller adjacent curtilages.	Aerial, Mapping, Site Visit
10	Open Space on corner of Boyneswood Road and Red Hill	3a	Area of open space on the edge of the built form should be excluded from the settlement.	Redraw boundary to exclude open space on the edge of settlement.	Aerial, Mapping, Site Visit
11	Land to rear of Boyneswood Road	1, 2b, 2d	The area of land represents a small-scale development opportunity which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area. Boundary also cuts through gardens along Watercress Way and Friars Oak. The curtilages of the properties are closely related to the character of the built form and have enclosing features.	Redraw the boundary to include the area of land.	Aerial, Mapping, Application info (25256/032)
12	Gardens of Woodview Place and Timbers	1, 2b	Boundary cuts through gardens of Woodview Place and Timbers. The curtilages of the properties are closely related to the character of the built form and have enclosing features. The area to the east of the properties represents a small-scale development opportunity which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area.	Redraw boundary to include gardens along defined feature.	Aerial, Mapping
13	Land west of Lymington Barn	2c	Land allocated in the Draft Local Plan for approximately 90 dwellings.	Redraw boundary to include allocated site.	Aerial, Mapping, Draft Local Plan

14	Land to the rear of Brackenbury Gardens and, Boyneswood Close	2a	Land has permission for 45 dwellings (25256/049)	Redraw boundary to include site with planning permission.	Aerial, Mapping, Application info (25256/049)
-----------	---	----	--	---	---

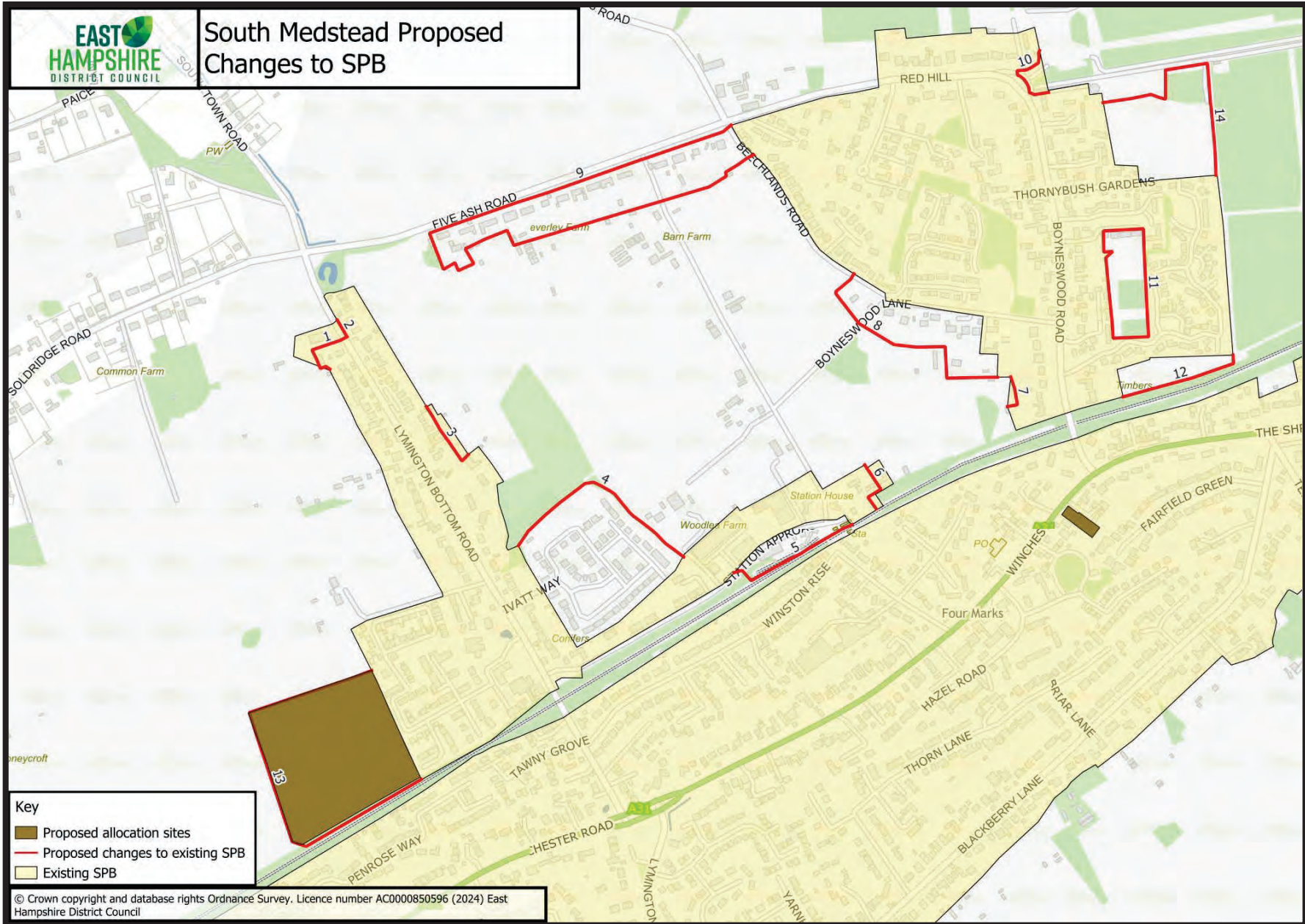
Four Marks Proposed Changes to SPB



Key

- Proposed allocation sites
- Proposed changes to existing SPB
- Existing SPB
- District boundary
- South Downs National Park

South Medstead Proposed Changes to SPB



Key

- Proposed allocation sites
- Proposed changes to existing SPB
- Existing SPB



METIS HOMES

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

(By email only)

29 February 2024

Dear Mr Harvey,

Response to current consultation on the Local Plan 2021 – 2040: Regulation 18 (January 2024)

These representations are prepared in response to East Hampshire District Council's current consultation on its Local Plan 2021 – 2040: Regulation 18 (January, 2024) (hereafter 'the Plan'). Metis Homes responds on the basis that we have land interests in a number of settlements within the District.

Metis Homes welcomes consultation on the District's Plan and supports the proactive approach to accommodating new, much needed housing in sustainable locations. The strategy for accommodating that growth across a range of site sizes ranging from a strategic settlement extension to more immediately available sites is welcomed. This is a sensible approach as it provides a strong likelihood that new homes will be delivered in the short, medium and long term at a pace to mirror and support growth in other areas such as employment, community and other uses. Metis Homes have land interests at Horndean, Four Marks and Alton and supports the growth of each of those settlements.

PART OF THE R.O. GROUP

sales@metishomes.co.uk | customercare@metishomes.co.uk | land@metishomes.co.uk

01962 893535 | metishomes.co.uk

The Old Barn, Vicarage Farm Business Park, Winchester Rd, Fair Oak, Eastleigh SO50 7HD



Managing Future Development

Policy S2: Settlement Hierarchy

Metis Homes supports the inclusion of Holybourne with Alton as the only Tier 1 settlement in the District. Furthermore, the inclusion of Horndean as a Tier 2 settlement is welcomed.

As set out below, Metis Homes considers that Four Marks should be elevated from a Tier 3 settlement to a Tier 2 settlement. This is based on the level of services and facilities, designation of its centre as a Local Centre, and the resultant level of housing allocated to Four Marks, within the Plan based on those sustainability credentials.

Responding to the Climate Emergency

Policy CLIM1: Tackling the Climate Emergency

Metis Homes supports the aims and objectives of this policy however, the specific requirements within the policy require stringent viability testing to ensure they do not render new development unviable. For example, part 3, point a. of the policy seeks net-zero operational carbon dioxide. This could be an onerous requirement and is more likely to affect the viability of small to medium sized developers / developments and should be viability tested across a range of development types and sizes.

Policy CLIM2: Net-Zero Carbon Development: Operational Emissions

The principles of this policy, seeking to reduce carbon emissions, is reflective of national guidance and legislation to reduce the impact of new development on the environment. In a similar way to CLIM1 however, Metis is keen to ensure that emerging policies are properly viability tested to ensure they do not negatively impact the prospects of new development coming forwards. This is particularly important in the context of small to medium sized developers and developments. Metis Homes would be pleased to discuss this point further with the Planning Authority as necessary.

PART OF THE R.O. GROUP

sales@metishomes.co.uk | customercare@metishomes.co.uk | land@metishomes.co.uk

01962 893535 | metishomes.co.uk

The Old Barn, Vicarage Farm Business Park, Winchester Rd, Fair Oak, Eastleigh SO50 7HD



Safeguarding our Natural and Built Environment

Policy NBE8: Water quality, supply and efficiency

The positive contribution this policy may have towards protecting the District's water environment is recognised. Metis Homes would however, question the reasonableness of the requirement to meet a 95 l/pp/pd water efficiency standard. This figure is in excess of current Building Regulations requirements and whilst it is accepted that fixtures which would achieve this target are available, the method of testing relates to a per capita result and misses opportunities for individual fixtures and fittings to achieve a higher level of water efficiency. This is a matter that would be better addressed through Building Regulations and it is not necessary for the requirement to be replicated in planning policy.

Site Allocations

Metis Homes supports the approach within the Plan for Alton, together with Holybourne, to continue to accommodate the greatest levels of growth within the District. Alton is a high order, sustainable location with a wide range of services and facilities to support existing and future residents. It is well served by existing transport infrastructure including a train station and major 'A' road, both of which provide onward connections to major conurbations and beyond. Within the context of East Hampshire, Alton is an employment hub with a range of existing employment sites that provide a range of types and sizes of employment floor space for long term tenancy down to short term lets. These sites provide employment opportunities for existing and future residents. To ensure Alton continues to thrive as a Tier 1 settlement, it should continue to be considered for both new residential and employment allocations which will be mutually beneficial to one another, to Alton itself, and of course the wider economy of East Hampshire and its longevity as a thriving place to live and work.

PART OF THE R.O. GROUP

sales@metishomes.co.uk | customercare@metishomes.co.uk | land@metishomes.co.uk

01962 893535 | metishomes.co.uk

The Old Barn, Vicarage Farm Business Park, Winchester Rd, Fair Oak, Eastleigh SO50 7HD



Policy HDN3: Land north of Chalk Hill Road, Horndean

Metis Homes supports the inclusion of Policy HDN3 within the Plan. Metis Homes has promoted the site since 2022 which has included wide ranging consideration and assessment of the site and its surroundings taking into account the location of the site and its close proximity to a range of services and facilities (See Appendix A – Local Services and Facilities Plan), the overall sustainability of Horndean as a settlement, the pattern of existing development within the settlement, landscape character including consideration of key views of the site from the South Downs National Park, ecology, trees, topography, and existing and surrounding neighbours.

Metis Homes is keen to work with Members and Officers of the Council, together with local stakeholders and interested parties, to deliver a high quality development on the site that appropriately responds to the constraints and opportunities presented by the site.

This site is particularly well placed to accommodate new development in the southern part of the District as it will assist in addressing the shortfall in the southern PFSH authorities that is likely to persist given the constrained nature of the many of those locations (for example, Portsmouth, Havant and Gosport all being coastal locations with associated flood and ecological sensitivities).

Metis Homes continues to supplement the work done to date in relation to the site through keeping relevant surveys and data up to date which will ensure that, should an application be submitted, it will be supported by the most up to date technical information.

Development Management Policies

Policy DM17: Backland Development

It would appear that this policy seeks to respond to para. 72 of the NPPF which states, ‘Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area’. Para 72 was introduced to protect residential garden land from development once it had been

PART OF THE R.O. GROUP

sales@metishomes.co.uk | customercare@metishomes.co.uk | land@metishomes.co.uk

01962 893535 | metishomes.co.uk

The Old Barn, Vicarage Farm Business Park, Winchester Rd, Fair Oak, Eastleigh SO50 7HD



removed from the definition of previously developed land. As such, specific policies relating to the consideration of gardens, as undefined land in planning terms (i.e. not pdl, not countryside) may be required in certain locations. Policy DM17 addresses this matter but also includes other land *'to the rear or side of existing residential property'*. This part of the policy is ambiguous in that there is no clear definition on where or how that land might relate to an existing residential property. It is possible for land to be to *'the rear of an existing residential property'* but be completely unrelated to it, in separate ownership, be visually screened and take access from an entirely different location. In those instances it is inappropriate for that land to be considered through a policy relating to *'backland'* development. In addition, where this land is within the Settlement Policy Boundary, as referred to in the policy, it is already addressed through other policies in the plan and it is not necessary to replicate those requirements within Policy DM17. The policy should therefore, be amended as follows:

'Housing development on garden land ~~and/or to the rear or side of existing residential property~~ within the defined Settlement Policy Boundary will be supported provided that:.....'

Background Paper: Settlement Hierarchy Background Paper

Four Marks (with South Medstead) is currently ranked as a Tier 3 settlement alongside Bentley, Clanfield, Grayshott, Headley, Holt Pound and Rowlands Castle. The Tier 2 settlements are Horndean, Liphook, Whitehill and Bordon (including Linford). Four Marks has a range of services comparable with those higher order settlements and this is reflected in the fact its centre is classed as a Local Centre, much like other Tier 2 settlements. Four Marks has also been identified within the Plan as being capable of accommodating a scale of housing growth beyond the amount identified within settlements considered as being higher up the hierarchy. To put this in context, housing allocations in Four Marks provide for 210 new homes. By comparison, Liphook, already a Tier 2 settlement, has only 111 dwellings allocated. The Hierarchy is, in effect, a step behind other policy elements within the Plan.

The Settlement Hierarchy Review published with an earlier version of the Regulation 18 Plan (Local Plan Issues and Priorities (part 1) regulation 18 2022-23) ranked Four Marks as a Tier 2 settlement alongside Clanfield, Grayshott and Horndean. That ranking was based on an assessment of access to services. Four Marks scored 19 'points' by comparison to 18

PART OF THE R.O. GROUP

sales@metishomes.co.uk | customercare@metishomes.co.uk | land@metishomes.co.uk

01962 893535 | metishomes.co.uk

The Old Barn, Vicarage Farm Business Park, Winchester Rd, Fair Oak, Eastleigh SO50 7HD



(Clanfield), 21 (Grayshott), and 25 (Horndean). However that scoring did not properly take into account the range and depth of services and facilities in the settlement. A clear example of this can be seen in Appendix B of that paper which examines the location of the employment sites. Clearly Alton, as the highest order settlement contains the highest number of employment sites at 15 out of 29. Following Alton, Horndean contains 6. The next highest scoring location for existing employment sites is Four Marks at 3. To provide further context, Liphook, a proposed Tier 2 settlement has only 2.

In terms of sustainability, p.20 para 4.19 of the Local Plan Transport Background Paper (January, 2024) confirms that Four Marks is well served by buses, along with Alton; *'The north of the district, particularly settlements such as Four Marks and Alton on the A31 corridor, benefit from regular bus service of the 64 route, which operates 7 days a week and hourly or half hourly service between 07:00 and 00:00.'*

Furthermore, the emerging priorities within the Council's LCWIP demonstrate that the Four Marks is well connected to Alton through existing cycle infrastructure which the measures outlined within the LCWIP will further enhance. Whilst the LCWIP is to be updated in 2024, it is understood that the existing priority cycle routes will be retained within the updated version. This further reinforces the sustainability and significance of Four Marks as a high ranking settlement.

This connectivity, together with the fact Four Marks is in the immediate vicinity of Alton means there is an opportunity to provide a strengthened settlement hub along the A31 (which was previously explored as a growth option by the Council through public consultation, so it would appear this area within the District has been considered positively by both Officers and Members) and could reinforce the significance of this part of the District to continue to sustainably accommodate growth where there is access to a wide range of services and facilities, outside of the National Park. To assist this, Four Marks should be elevated to a Tier 2 settlement within the Plan to reinforce its significance in providing this role.

The inclusion of Holybourne as part of Alton within the settlement hierarchy is welcomed. This reflects the proximity of Holybourne to Alton, access to the wider range of services within the Town Centre, together with the existing facilities already in Holybourne.

PART OF THE R.O. GROUP

sales@metishomes.co.uk | customercare@metishomes.co.uk | land@metishomes.co.uk

01962 893535 | metishomes.co.uk

The Old Barn, Vicarage Farm Business Park, Winchester Rd, Fair Oak, Eastleigh SO50 7HD



Background Paper: Settlement Policy Boundary Review

The inclusion of Land at Chalk Hill Road, Horndean: HDN3 within the settlement of Horndean, as contained in the Settlement Policy Boundary Review paper, is welcomed. Its inclusion is reflective of the draft allocation within Chapter 12 of the Plan, and an amendment of the settlement in this location will ensure the site is properly incorporated in to the community within which it is located. One minor point of clarification, it would appear that the 'Action' relating to the boundary alignment (page 39, point 10) needs to be adjusted to remove the text *'Redraw boundary along opposite side of the road'* and replace with *'Redraw boundary to include allocated site'*.

Metis Homes welcomes the inclusion of 'Land rear of 131 Winchester Road' within the Settlement Policy Boundary of Four Marks. This is reflective of the Inspector's conclusion in the determination of planning application 30800/10 where it was concluded that the site does not fulfil a countryside role. The site is enclosed on three sides by existing development, accessed along a main route through this part of the settlement and also within walking distance of a wide range of services and facilities. It is therefore, entirely appropriate for the site to be included in the settlement boundary as proposed through the Council's Settlement Policy Boundary Review.

I trust the above comments will be taken into consideration in the assessment of the Plan and Metis Homes requests to be kept updated with progress please.

PART OF THE R.O. GROUP

sales@metishomes.co.uk | customercare@metishomes.co.uk | land@metishomes.co.uk

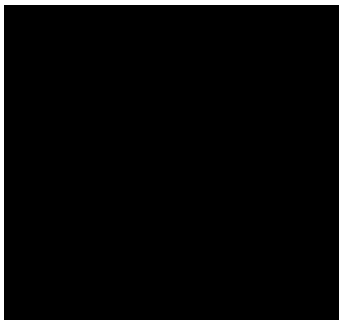
01962 893535 | metishomes.co.uk

The Old Barn, Vicarage Farm Business Park, Winchester Rd, Fair Oak, Eastleigh SO50 7HD



Should you or your colleagues wish to discuss any of the above further, please contact me on the details below.

Your sincerely,



Enc.

Appendix A – Local Services and Facilities Plan

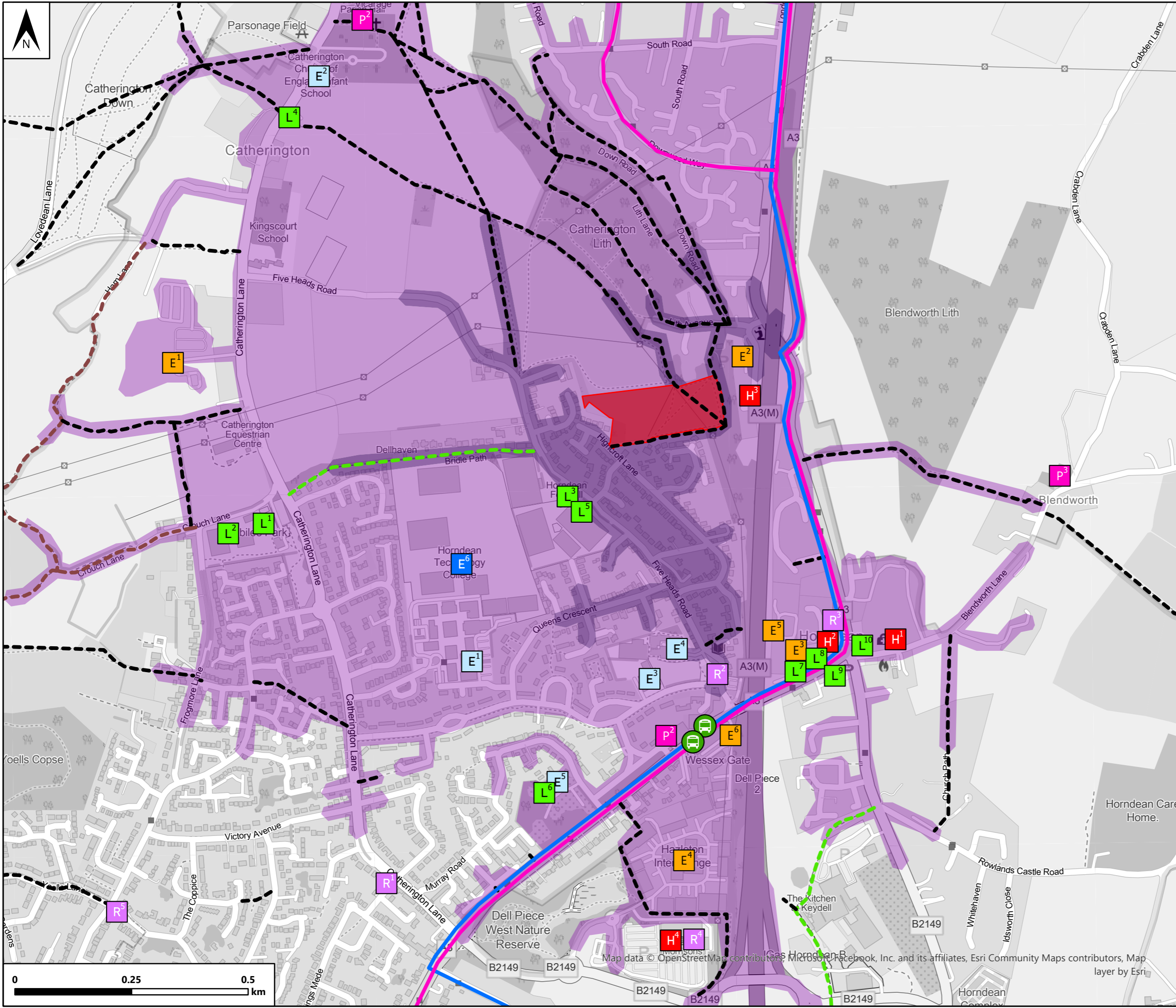
PART OF THE R.O. GROUP

sales@metishomes.co.uk | customercare@metishomes.co.uk | land@metishomes.co.uk

01962 893535 | metishomes.co.uk

The Old Barn, Vicarage Farm Business Park, Winchester Rd, Fair Oak, Eastleigh SO50 7HD





Key	
	Site Boundary
	800m Walking Isochrone
	1600m Walking Isochrone
	Bus Stops
	Bus Route - Service 8
	Bus Route - Service 37
	Footpath
	Bridleway
	BOAT
	SPAR Convenience Store
	One Stop Convenience Store
	Hordean Post Office
	Morrisons
	Lovedean Post Office
	Dimensions Childcare - Nursery School
	Catherington C of E School
	Hordean Infant School
	Hordean C of E Junior School
	Merchistoun Minnows Preschool
	Hordean Technology College
	Catherington Business Park
	Enterprise Industrial Estate
	Hordean Precinct
	Hazleton Interchange
	Westfield Industrial Estate
	Wessex Gate Industrial Estate
	Hordean Practise (GP)
	Everetts Pharmacy
	South Coast Opticians Ltd
	Morrisons Pharmacy
	Jubilee Hall Community Centre
	Jubilee Park Playground
	Hordean Football Club and Sports Bar
	The Farmer Inn
	Five Heads Recreation Ground
	Merchistoun Hall
	Paprika Restaurant
	Oh So Coffee Shop
	Red Lion Public House
	Four London Road Restaurant
	All Saints Church and Parish Hall
	Hordean Baptist Church
	Holy Trinity Church

Contains OS data © Crown copyright and database right 2022
 Contains public sector information licensed under the
 Open Government Licence v3.0
 © Crown copyright 2022 OS 100044286.

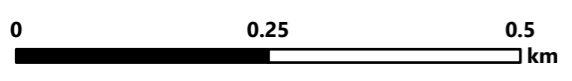


**The Square, Basing View,
 Basingstoke, Hampshire, RG21 4EB**
 Tel: 01256 637940
www.i-transport.co.uk

Title:
Local Facilities and Services Plan

Project:
Chalk Hill Road, Hordean

Project Number: ITB19520	Figure Number: Figure 2	Revision: -
------------------------------------	-----------------------------------	-----------------------



Map data © OpenStreetMap contributors, Microsoft, Facebook, Inc. and its affiliates, Esri Community Maps contributors, Map layer by Esri

Town and Country Planning Act 1990 (As Amended)

East Hampshire Local Plan 2040

Regulation 18 Our Local Plan 2021-2040

On behalf of:

Peter Ernest Homes

February 2024 V 1.1



Contents

1. Introduction	1
2. Policy CTN2 Land at The Dairy	1

Appendices

Appendix A Site Layout for Applications 21864/020 and 21864/021

1. Introduction

1.1 Neame Sutton Limited is instructed by Peter Ernest Homes Limited (herein referred to as Peter Ernest Homes) to prepare site-specific representations in response to the East Hampshire District Draft Local Plan (Regulation 18) (herein referred to as the draft Local Plan). The National Planning Policy Framework (2023, para.15) (NPPF) states that succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social, and environmental priorities. Paragraph 16 of the NPPF highlights that plans should:

- Contribute to achieving sustainable development.
- Be positively and collaboratively prepared, as well as clear and unambiguous.
- Be accessible to assist public involvement.
- Serve a purpose and be consistent with national policy.

1.2 These representations have been prepared in the context of the NPPF and corresponding Planning Practice Guidance (PPG) and specifically address the proposed allocation CTN2 Land at The Dairy, in accordance with the Regulation 18 process, identifying the relevant paragraphs and policies where appropriate.

2. Policy CTN2 Land at The Dairy

2.1 Peter Ernest Homes has an option on the land at The Dairy, Catherington, which, at the time of preparing these representations, is the subject of two live planning applications running concurrently:

Ref: 21864/020 Nine residential dwellings and one commercial building (Class E(g)), together with the associated vehicular and pedestrian access, car parking, cycle storage and landscaping following demolition of existing buildings.

Ref: 21864/021 Hybrid Application: Construction of commercial unit (Use Class E(g)) with associated access, internal estate road and services. Outline for seven residential dwellings with all matters reserved, following demolition of existing buildings.

2.2 It is noted that the East Hampshire Land Availability Assessment (2023) identifies the status of the site as being unavailable and excluded. This is unexpected given the Council's proposal to allocate the site in the draft Local Plan. Peter Ernest Homes can confirm that the site is available and supports the draft allocation overall. The two, live planning applications demonstrate Peter Ernest Homes' commitment to delivering the site.

2.3 The NPPF (2023, para.123) promotes the effective use of land in meeting the need for homes and strategic policies should set out a clear strategy for accommodating the objectively assessed needs in a way that makes as much use as possible of previously developed land (PDL), where planning policies should promote the development of under-utilised land and buildings, as well as support appropriate opportunities to remediate derelict and contaminated land (para.124).

2.4 This site would make valuable use of PDL, as set out in the policy. However, Peter Ernest Homes is concerned about the viability of providing S106 financial contributions towards the extension of Horndean Surgery or a replacement surgery at Clanfield in the context of remediating the site. It is therefore, considered that this infrastructure requirement should be amended to reflect the potential cost

implications, for example remediating potential contamination risks and site clearance, of developing a previously developed site. Furthermore, the Council will need to demonstrate how the proposal for contributions towards either the extension of Horndean Surgery, or a replacement surgery at Clanfield, comply with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (As Amended), as without this, the requirement in the policy would be unlawful.

- 2.5 On this basis, further evidence from the Council is required to support the inclusion of the proposal and, where it is included, the policy needs to recognise the viability considerations outlined.

Appendix A

NOTES:
 This drawing has been prepared for the purpose of Planning Application approval only and is not to be used for any other purpose.
 All dimensions to be checked on site and any discrepancy notified to LUNDI ARCHITECTS. This drawing is the property of LUNDI ARCHITECTS and must not be reproduced, in part or whole, or deviated from, without their permission.

ACCOMMODATION				
unit	type	size	parking	
RESIDENTIAL				
1	3 bed house	97.3 sqm	1,047 sqft	2 spaces
2	3 bed house	97.3 sqm	1,047 sqft	2 spaces
3	4 bed house	168 sqm	1,808 sqft	3 spaces + garage
4	4 bed house	153 sqm	1,646 sqft	3 spaces + garage
5	4 bed house	166.4 sqm	1,791 sqft	3 spaces + garage
6	2 bed bungalow	73 sqm	785 sqft	2 spaces
7	3 bed bungalow	74 sqm	796 sqft	2 spaces
8	3 bed bungalow	85.3 sqm	918 sqft	2 spaces
9	3 bed bungalow	85.3 sqm	918 sqft	2 spaces
total		999 sqm	10,670 sqft	
Sheds are included in rear gardens Bin stores are provided within garden / parking area				
COMMERCIAL				
2	2 storey unit	63.6 sqm	685 sqft	3 spaces



key to drawing

- Existing Buildings Within or surrounding site
- Road Public highway and pedestrian footpath outside the site
- Central Courtyard Permeable bonded gravel
- Public Verge Existing and new landscaped verge adjacent to the site
- New Gardens Mostly grass and soft landscaping to new units
- Landscaped Areas semi private areas with new trees and planting
- Paving - vehicular permeable gravel paving to parking areas
- Paving - Pedestrian permeable brick or gravel paving to private and semi private areas.
- Existing trees Trees to be retained - some may be pruned as recommended
- Landscaped buffer new and existing shrubs and native hedge to perimeter boundary
- New trees Semi mature native and fruit trees in key location within the site
- New landscaping Indicative areas of shrubs and perennial planting semi private and private areas of site.
- Site Boundary - 0.49 ha 9 units @ 18 dph.
- A/C Provision Indicative zone for possible ground level A/C unit

Refer to drawing 006 for information on Parking, bins, bikes and fences

AMENDMENTS	DATE	
F	Minor amendment	08.12.23
E	PLANNING ISSUE	05.10.23
D	Additional site info updated	11.09.23
C	Site plan updated	29.08.23
B	Minor update to plan	11.08.23
A	General updates to plan	09.08.23

CLIENT
 PETER ERNEST HOMES LTD

PROJECT
 RESIDENTIAL DEVELOPMENT
 THE DAIRY,
 CATHERINGTON
 HANTS

DRAWING TITLE
 SITE PLAN
 AS PROPOSED

DATE
 JANUARY 2023

SCALE
 1:200 @ A1 1:400 @ A3

DRAWING No.
 LA2289 005

REVISION
 F



Lundi Architects Ltd
 THE STUDIO
 12A FIVE HEADS ROAD
 HORNDEN
 HANTS, PO8 9NW
 www.lundi-architects.co.uk
 studio@lundi-architects.co.uk

SITE PLAN AS PROPOSED

1:200

THE DAIRY, CATHERINGTON

Appendix A

NOTES:
 This drawing has been prepared for PLANNING APPLICATION and is not to be used for any other purpose.
 All dimensions to be checked on site and any discrepancy notified to LUNDI ARCHITECTS. This drawing is the property of LUNDI ARCHITECTS and must not be reproduced, in part or whole, or deviated from, without their permission.

DEVELOPMENT SITE
0.49ha.

COMMERCIAL PLOT - 0.12ha.
 Includes main entrance and internal access road.

Proposed Commercial Unit
 2 storey building @ 150 sqm GEA
 125.4 sqm GIA

Buried services to support full site and future Self Build plots.
 Commercial unit and associated parking
 Visitor parking area and Bin and bike provision

SELF BUILD UNITS
 Suggested 2 storey height with maximum Gross Internal Area

Plot 1 - 135 sqm / 1460 sqft

Plot 2 - 158 sqm / 1700 sqft

Plot 3 - 158 sqm / 1700 sqft

Plot 4 - 158 sqm / 1700 sqft

Plot 5 - 158 sqm / 1700 sqft

Plot 6 - 116 sqm / 1250 sqft

Plot 7 - 116 sqm / 1250 sqft



- Main Access Road
- Verge
- Gardens
- Open space
- Parking bays for visitors and Commercial unit. Refer to Bright Plan Statement.
- Existing trees Refer to Arboricultural report
- Boundary Landscaping
- Additional planting
- Lighting 1.0m high bollard light at entrance to footpath
- A/C Provision Indicative zone for possible ground level A/C units

AMENDMENTS	DATE
E PLANNING ISSUE	07.11.23
D Final Issue	07.10.23
C render added	11.09.23
B minor amendments	08.09.23
A minor amendments	05.09.23

CLIENT
PETER ERNEST HOMES LTD

PROJECT
SELF BUILD DEVELOPMENT
THE DAIRY,
CATHERINGTON
HANTS

DRAWING TITLE
PROPOSED HYBRID SITE PLAN

DATE
 AUGUST 2023

SCALE
 1:200 @ A1 1:400 @ A3

DRAWING No.
LA2332 007

REVISION
 E



Lundi Architects Ltd
 THE STUDIO
 12A FIVE HEADS ROAD
 HORNDEN
 HANTS, PO8 9NW
 www.lundi-architects.co.uk
 studio@lundi-architects.co.uk

SITE PLAN - AS PROPOSED

1:200

THE DAIRY, CATHERINGTON

Town and Country Planning Act 1990 (As Amended)

East Hampshire Local Plan 2040

Regulation 18 Our Local Plan 2021-2040

On behalf of:

Peter Ernest Homes Ltd.

February 2024 V 1.2



Contents

1.	Introduction	1
2.	Chapter Three: Managing Future Development.....	1
i.	Housing Requirement.....	1
ii.	Settlement Hierarchy and Spatial Strategy.....	2
3.	Site-Specific Representations: White Dirt Field (LAA/HD-009)	3

Tables

Table 1: Accessibility and IIA Comparison of Sites.....	3
---	---

Appendices

Appendix A	Site Location Plan
------------	--------------------

1. Introduction

- 1.1 Neame Sutton Limited is instructed by Peter Ernest Homes to prepare representations in response to the East Hampshire District Draft Local Plan (Regulation 18) (herein referred to as the draft Local Plan).
- 1.2 The National Planning Policy Framework (2023, para.15) (NPPF) states that succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social, and environmental priorities. Paragraph 16 of the NPPF highlights that plans should:
- Contribute to achieving sustainable development.
 - Be positively and collaboratively prepared, as well as clear and unambiguous.
 - Be accessible to assist public involvement.
 - Serve a purpose and be consistent with national policy.
- 1.3 These representations have been prepared in the context of the NPPF and corresponding Planning Practice Guidance (PPG) and specifically address the specific topics identified throughout the draft Local Plan, in accordance with the Regulation 18 process, identifying the relevant paragraphs and policies where appropriate.

2. Chapter Three: Managing Future Development

i. Housing Requirement

- 2.1 The starting point in addressing the housing requirement is the Government's standard method (NPPF 2023, para.61). The Planning Practice Guidance (PPG, para.002, ID 2a-002-20190220) reiterates that the standard method identifies the minimum, annual housing need figure, but does not provide the housing requirement. Paragraph 61 of the NPPF goes on to state that, in addition to the local housing need (LHN) figure, any need that cannot be met within the neighbouring authorities, should also be accounted for in establishing the housing requirement.
- 2.2 Based on the standard method, the Council (including the SDNP) should be providing a minimum of 10,982 homes over the Plan period (2021-2040), which equates to 578 dwellings per annum. However, the Council is relying on the PPG provision (Paragraph: 014 Reference ID: 2a-014-20190220) in relation to where strategic policy-making authorities do not align with local authority boundaries (specifically the National Park), to set a locally identified housing need figure, which has been set as 8,816 homes (464 dwellings per annum).
- 2.3 The draft Local Plan (p.227, Table 9.8) identifies the need for 613 affordable dwellings per year across the whole of the district, including the South Downs National Park. This in itself is a huge requirement, which necessitates the allocation of appropriately sized sites that can contribute to this need.
- 2.4 With reference to unmet need across the neighbouring authorities, particularly the South Downs National Park, the Reg 18 Plan has estimated a potential unmet need of 14 dwellings per annum, or 266 over the Plan period, which has been based on historic agreements with SDNPA, and increases the housing requirement to 9,082 houses (478 dwellings per annum). As the Statement of Common Ground between South Downs National Park Authority and East Hampshire District Council (January 2024) highlights, the

extent of the unmet need in the South Downs National Park Authority is not yet available and although the Council is taking a pragmatic approach based on historic agreements, the extent of the unmet need is unknown, and as such, the standard method housing need figure should be applied to ensure that the housing requirement set out at the beginning of the Plan period is accurate and sufficient sites are identified.

- 2.5 The Council cannot reasonably seek to rely on historic agreements as the basis for determining how much of the LHN figure, calculated via the Standard Method, is apportioned to the SDNP. The historic agreements were prepared on the basis of previous Local Plans, which applied the Objectively Assessed Needs (OAN) analysis to housing requirement, and as a result, cannot accurately represent the current position for either EHDC or SDNP.
- 2.6 The Council must, therefore, plan for the LHN calculated via the Standard Method as a minimum and, until such time as up-to-date evidence exists to establish the extent of the need that can be met by the SDNPA.
- 2.7 In addition to the SDNPA, the Council has failed to consider the unmet need arising from other neighbouring authorities, such as Waverley in Surrey. This needs to be addressed as part of the Council's statutory and ongoing duty to cooperate with its neighbours.
- 2.8 Lastly, the Council has not considered whether it is appropriate to plan for a higher level of housing need than that identified by the standard method, to address matters such as the acute affordable housing need in the district, as well as the historic higher levels of delivery that may not be accurately reflected by the 2014 based household projections.
- 2.9 Peter Ernest Homes considers that the standard method figure of 578 dpa, is the minimum that the Council should be planning for in the district and that further detailed work is required prior to any reduction in this figure. It is more likely that the figure will need to be increased to reflect the actual need across the district and to assist in tackling the acute affordable housing need.

ii. Settlement Hierarchy and Spatial Strategy

- 2.10 Paragraph 3.33 highlights that Policy S2 provides a revised and updated settlement hierarchy, informed by a re-assessment of the existing Joint Core Strategy (2014) hierarchy, and that this policy will ensure that new development is directed to the more sustainable settlements.
- 2.11 Paragraph 3.36 highlights that each of the tiers within the settlement hierarchy will contribute to future growth, with the largest levels of growth expected in the higher order, Tier 1 and 2 settlements. In providing growth in these areas, residents will be housed in close proximity to jobs, shops, leisure and cultural facilities and public transport.
- 2.12 Horndean is described as one of the larger settlements, with its position providing access to key facilities, as well as good access to the open countryside and woodland to the east (p.391). In allocating a minimum of a further 320 dwellings to Horndean, there is a recognised need for housing in the southern area. Peter Ernest Homes supports Horndean having been identified as a Tier 2 settlement and considers that it has capacity to accommodate further growth in a sustainable manner.
- 2.13 Peter Ernest Homes also supports the Council's acknowledgement that the housing need in the district cannot be met entirely through previously developed sites within the existing defined settlements, and

that greenfield sites will need to be released to meet the need as part of a sustainable development strategy.

3. Site-Specific Representations: White Dirt Field (LAA/HD-009)

- 3.1 Peter Ernest Homes has an option on the land at White Dirt Lane, Horndean (HD-009), which has been promoted through the earlier call for sites exercise, as a suitable and sustainable location for accommodating housing, including self and custom build units. The Site Location Plan is included in Appendix A for ease of reference.
- 3.2 Chapter 12 proposes 42 sites for new development. The Plan makes it clear that the sites are proposed for allocation but have not yet been confirmed as suitable for development (p.333). As the proposed site allocations have not been confirmed, there is no criteria to regulate development. A summary of the reasons for including the sites has been provided, and a high-level assessment of the sites included in the LAA (2023) undertaken in the Integrated Impact Assessment for the East Hampshire Local Plan (January 2024) (IIA). There is no reasoned justification for the selection of the site allocations proposed.

Table 1: Accessibility and IIA Comparison of Sites


	HD-009 White Dirt Field	HD-024 Land at Woodcroft (Proposed Allocation HDN1)	HD-004 Land South of Five Heads Road (Proposed Allocation HDN2)	HD-008 Land North of Chalk Hill Road (Proposed Allocation HDN3)
Accessibility Score	24	16	19	24
IIA Objective				
1. Biodiversity	Negligible	Mixed Minor	Mixed Minor	Mixed Minor
2. Carbon Emissions	Significant Positive	Significant Positive	Significant Positive	Significant Positive
3. Climate Adaptation	Negligible	Minor Negative	Negligible	Negligible
4. Accessibility	Significant Positive	Minor Positive	Significant Positive	Significant Positive
5. Health and Wellbeing	Significant Positive	Minor Positive	Significant Positive	Significant Positive
6. Economy	Significant Positive	Minor Positive	Significant Positive	Significant Positive
7. Heritage	Effect Uncertain	Effect Uncertain	Effect Uncertain	Effect Uncertain
8. Housing	Minor Positive (75)	Significant Positive (164)	Significant Positive (118)	Minor Positive (38)
9. Landscape	Minor Negative	Minor Negative	Minor Negative	Minor Negative
10. Natural Resources	Significant Negative	Significant Negative	Significant Negative	Significant Negative
11. Water Resources	Minor Negative	Significant Negative	Minor Negative	Minor Negative
12. Pollution	Negligible	Negligible	Negligible	Significant Negative

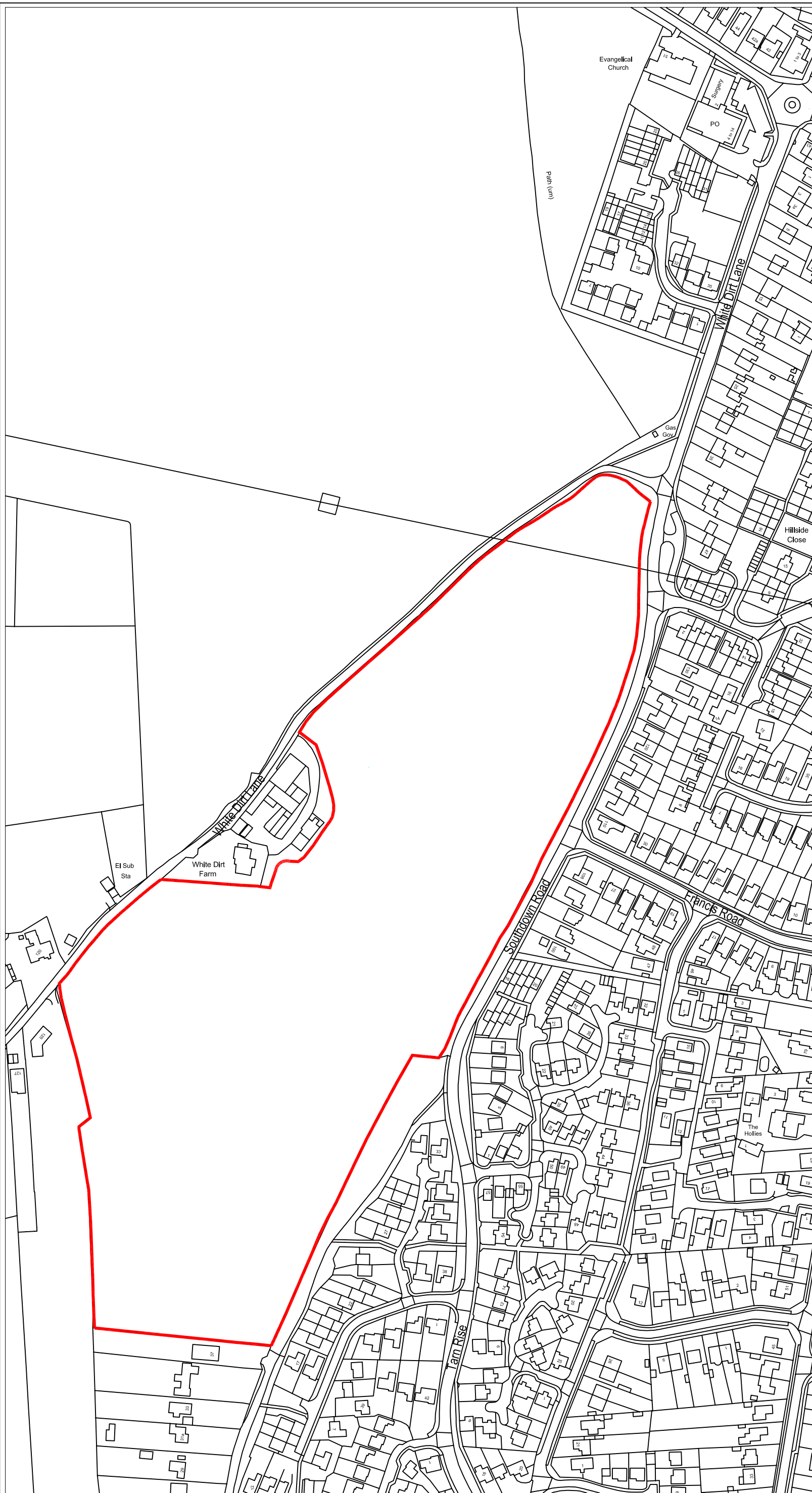
- 3.3 The LAA (2023) identifies the site at White Dirt Field (HD-009) as developable within 0 to 5 years, for a capacity of approximately 75 residential dwellings. It is evident, from the Council's assessment of the sites, that White Dirt Field (HD-009) scores better than the proposed allocation at HDN1 (Land at Woodcroft) and similarly to the proposed allocations HDN2 (Land South of Five Heads Road) and HDN3 (Land North of Chalk Hill Road). Peter Ernest Homes' promotion site is, therefore, clearly a sustainable option for accommodating growth at Horndean.
- 3.4 With Biodiversity Net Gain (BNG) becoming mandatory, there will also be an impact on the sites being considered. For example, Peter Ernest Homes has estimated that if provided on site, 25 per cent of the gross site area will be attributed to BNG. This being the case, the Council will need to identify and release additional sites. White Dirt Field (HD-009) could accommodate a larger number of dwellings than the 75 identified in the LAA.
- 3.5 Given that the housing requirement should be measured against the standard method as a minimum, East Hampshire District Council should consider allocating additional sites to meet the needs of the district and Peter Ernest Homes' promotion site represents an ideal opportunity to assist in meeting that need.
- 3.6 Peter Ernest Homes is happy to work with the Council as the draft Local Plan progresses, in terms of promoting the site for inclusion as a housing allocation.

The copyright of this drawing and designs remains with CSa Environmental Planning. Do not scale from this drawing. Refer to figured dimensions only.



LEGEND

 Application Site Boundary Outline



Revision	Date	By	Description

CSa environmental planning
 Dixies Barns
 High Street, Ashwell
 Hertfordshire, SG7 5NT
 t 01462 743647
 f 01462 743648
 e ashwell@csaenvironmental.co.uk

Project Land off Southdown Road, Hordean
 Title Application Site Boundary Plan
 Client Taylor Wimpey UK Ltd

Scale @ Size 1:2,500 @ A3
 Date July 2014
 Drawing Number CSa/2207/112

Drawn JC
 Checked RR
 Revision -