

# East Hampshire Local Plan Regulation 18 Consultation

Representations

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ON BEHALF OF TANVALE LIMITED

March 2024

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## 1. Introduction

- 1.1 These representations have been prepared by Nexus Planning on behalf of Tanvale Limited in response to the East Hampshire New Local Plan ('the Draft Plan') consultation (Regulation 18).
- 1.2 Tanvale Limited has an interest in all strategic and non-strategic matters informing the preparation of the Plan. However, these representations are made specifically in the context of Land at Lynch Hill, Alton ('the Site'), which is identified as a preferred option to deliver an employment development (site allocation reference ALT7).
- 1.3 These representations cover the following elements of the Draft Plan:
  - i. Vision and Objectives;
  - ii. Spatial Strategy; and
  - iii. Policy Proposals.
- 1.4 Tanvale Limited support in principle the approach taken by the Draft Plan to seeking to deliver strategic development within the district's most sustainable settlements and promoting 'living locally'. However they consider that a number of proposed housing allocations potentially conflict with the Draft Plan's stated objectives and that the potential of the Lynch Hill site has not been fully considered in the context of a deliverable strategy for sustainable growth.
- 1.5 Tanvale Limited is committed to on-going engagement with the Council regarding the Draft Plan, and the Lynch Hill Site in particular, to ensure it delivers against the stated Draft Plan objectives and the requirements of the National Planning Policy Framework ('the Framework') as effectively as possible.

### The Site

- 1.6 The Site measures approximately 14.3ha and comprises of an arable field. It is bound by existing employment uses at the Mill Lane Industrial Estate, a water treatment works and a single residential dwelling (Lynch Hill Cottage) to the south-west. The site fronts on to Montecchio Way, a key route into Alton from the strategic A31 and is also adjacent to the Alton junction of the A31.
- 1.7 The Site is sustainably located on the edge of Alton and with the potential for an access on to Montecchio Way already confirmed it is approximately 1,300m from Alton Town Centre; 1,100m from a doctor's surgery; 1,000m from a primary school; 700 m from a secondary school; 600m from a supermarket (or around 300 m via an existing pedestrian bridge over the River Wey; 700m from an existing bus stop; and 1,000m from Alton railway station.
- 1.8 The Site is not subject to any significant environmental constraints; it is located within Flood Zone 1; there are no statutory or non-statutory sites of nature conservation importance on or adjacent to Site; and it does not contain any TPOs.

- 1.9 There are a number of Grade II Listed buildings to the northeast of the Site, however the northern boundary of the Site forms a defensible and screened boundary.
- 1.10 The southern part of the Site is currently allocated under Policy EMP1 (Land at Lynch Hill) within the Council's Housing and Employment Allocations (adopted April 2016) which forms part of the Council's adopted Local Plan. This allocation is for about 7ha of employment land within the overall allocated site area of 9.4ha.
- 1.11 The whole Site (14.3ha) (site plan shown as **Appendix 1**) benefits from outline planning approval (ref. 49776/004) for development of up to 7ha of employment land (use classes B1a, B1c, B2 and B8) with associated access of the B3004 (submitted for detailed approval) and green infrastructure. This application was approved in June 2020.
- 1.12 A reserved matters application (ref. 49776/006) was submitted in June 2023 and is currently being progressed.
- 1.13 The Site has been allocated within the Draft Plan under reference ALT7 for employment use including industrial, storage & distribution with opportunity for complementary commercial use. This now proposes the development of the northern part of the Site, in addition to the existing Local Plan allocation (EMP1). This is an additional 4.9ha of land and is reflected within the new proposed settlement boundary (as per draft Policy S2). The nature of 'complementary commercial use' is not defined.

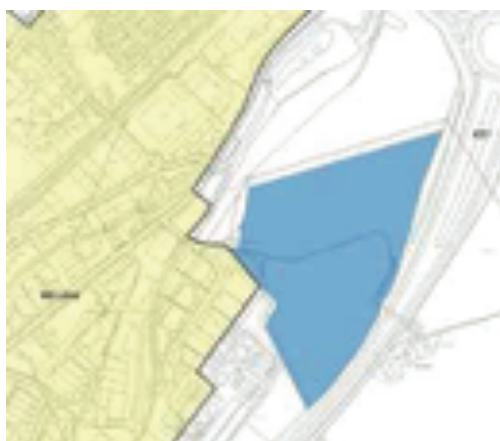


Figure 1. The existing Site allocation (defined in shaded blue) under Policy EMP1 of the Council's Housing and Employment Allocations



Figure 2. The proposed Site allocation (defined within the red line) under draft Policy ALT7 of the Regulation 18 Plan

## 2. Vision and Local Plan Objectives

2.1 Paragraph 2.4 of the Draft Plan outlines the Council’s vision to provide clarity on the type of place East Hampshire is anticipated to be, and what it will seek to achieve from development. The vision is as follows:

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

### Local Plan Objectives

2.2 The Draft Plan has three main objectives which are as follows:

- Objective A – Providing sustainable levels of growth through the Local Plan;
- Objective B – Providing better quality, greener development in the right locations; and
- Objective C – Prioritising the health and well-being of communities in delivering what’s needed to support new development.

2.3 These are then complemented by a number of subobjectives. The key main and supporting objectives are considered here to provide a basis for Tanvale Limited’s comments on the Draft Plan.

### Objective A: Providing Sustainable Levels of Growth Through the Local Plan

#### A1 – Housing Growth

2.4 Objective A1 aims 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.

2.5 The need to deliver a sufficient supply of new homes is evidenced by the increasing need for housing<sup>1</sup> within East Hampshire, particularly specialist housing<sup>2</sup> and affordable homes<sup>3</sup>.

2.6 In this context, it is important to note that paragraph 60 of the Framework outlines the Government’s clear objective of significantly boosting the supply of homes and ensuring that a sufficient amount and variety of land can come forward where it is needed.

#### General Housing Requirements

2.7 Housing supply and affordability are intertwined, and it is notable that housing affordability in East Hampshire has worsened over the past ten years, with a rise in house prices that has significantly outstripped the increase in median earnings. As a consequence, affordability ratios have worsened considerably over the period.

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<sup>1</sup> East Hampshire Housing and Employment Development Needs Assessment (May 2022) – Table 5.1

<sup>2</sup> East Hampshire Housing and Employment Development Needs Assessment (May 2022) – The Needs of Older People and those with Disabilities (page 130)

<sup>3</sup> East Hampshire Housing and Employment Development Needs Assessment (May 2022) – Affordable Housing Need Summary (page 109)

- 2.8 The HEDNA confirms that over the last 15 years the median house price-to-earnings ratio within the district has increased by just over 2.6 points from 9.92 in 2005 to 12.58 in 2020. It has seen significantly greater comparative growth than has been evident nationally and indeed notably higher than the region; pointing to a stronger comparative deterioration in affordability in the district.
- 2.9 As noted by National Planning Practice Guidance ('PPG')<sup>4</sup>, use of the Standard Method generated figure to inform the housing requirement will start to address affordability challenges that are manifest but will not arrest them entirely. Consideration should therefore be given to adopting a housing requirement that exceeds the minimum Local Housing Need ('LHN') figure, taking into consideration the baseline position against which the policies of the Draft Plan are formulated.
- 2.10 The Draft Plan identifies that to meet the district's minimum LHN, calculated via the Standard Method, a minimum of 10,982 homes should be provided across East Hampshire district (including the South Downs National Park) during the plan period (2021-2040). This is equivalent to 578 homes per annum.
- 2.11 However, the PPG allows strategic-making authorities that do not align with local authority boundaries, such as National Parks, to identify a housing need figure using a method determined locally. Therefore, the Draft Plan proposes that the minimum number of homes required in the Draft Plan area between 2021 and 2040 is 9,082 homes (478 homes per annum) and confirms that it will be for the South Downs National Park Authority to work through its own process to calculate local housing needs for its area.
- 2.12 As of 31<sup>st</sup> March 2023, part of the 9,082 homes minimum requirement was already made up of 940 net completions and existing planning permissions totally 3,965 new homes, with a windfall allowance of 1,320, leaving a requirement for a further minimum of 2,857 new homes plus appropriate buffer.
- 2.13 The Draft Plan references that there needs to be some allowance for flexibility and to allow for sites allocated not coming forward during the Draft Plan Period. In the context of the need for flexibility and addressing the potential unmet needs of the wider South Hampshire sub-region, the Draft Plan allocates sites that could deliver more than the 2,857 new homes requirement, specifically with a 22% buffer, allocating some 3,500 new homes
- 2.14 Paragraph 15 of the Framework 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; and a platform for local people to shape their surroundings. [emphasis added]*

- 2.15 Paragraph 60 of the Framework also states (inter alia):

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

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<sup>4</sup> Paragraph ref. ID: 2a-006-20190220

*need as possible, including with an appropriate mix of housing types for the local community”.*  
[emphasis added]

- 2.16 The Draft Plan proposes to deliver the minimum LHN for East Hampshire, which is consistent with paragraphs 15 and 60 of the Framework.
- 2.17 Tanvale Limited supports the Council’s proactive and flexible approach to housing through the inclusion of a 22% buffer, in the context that there is an element of uncertainty in meeting the unmet need from the National Park and the longer-term potential unmet needs of the wider South Hampshire sub-region. However, Tanvale Limited is concerned that the extent of the buffer suggests a lack of confidence over deliverability of sites chosen within the Draft Plan.

### Specialist Housing Requirements

- 2.18 The East Hampshire Housing and Employment Development Needs Assessment (May 2022) ‘the HEDNA’ reveals that there is a need for about 830 housing units with support (sheltered/ retirement housing) and around 760 housing units with care (extra care) together with additional nursing care bedspaces over the plan period. It states that by 2038 there is an estimated need for 1,597 additional dwellings with support or care across the whole study area. In addition, there is a need for 331 additional nursing and residential care bedspaces.
- 2.19 Within the Draft Plan period, the following planning applications have been submitted / approved in relation to C2 accommodation to date:

Application Reference	Proposal	Location	Decision
25050/065	Integrated retirement community (Use Class C2) comprising 95 independent living apartments	Alton	Pending decision
29113/015	New property to form nursing home with a link to No.82 following demolition of existing dwelling, together with a change of use from C3 to C2 (21 bedroom)	Waterlooville	Approved March 2023
59484	Development to provide 67 bed purpose built care home (Use Class C2)	Alton	Approved May 2023
Total – 95 dwellings with support or care, and 88 bedspaces.			

2.20 Whilst these applications provide some contribution in addressing the districts specialist housing needs, it is evident that the Council will need to continue to address this shortage and should explore opportunities to plan specialist housing within sustainable locations i.e. through the Draft Plan allocations.

## A2 – Economic Growth

2.21 Objective A2 aims to provide a sustainable level of economic growth to ensure that local people of all ages can access employment.

2.22 In terms of existing employment statistics within the district, it is understood that the job density ratio is 0.66, and the Council is aiming for a job density of 1.0. In addition, the labour productivity rate within the district is understood to be at £48,000 per worker and the Council is aiming for a rate of £58,000 per worker<sup>5</sup>.

2.23 Paragraph 85 of the Framework states that planning policies should help create the conditions in which businesses can invest, expand and adapt.

2.24 Paragraph 86 of the Framework is clear that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.

2.25 The HEDNA confirms that the projection of gross employment land needs within East Hampshire (including the National Park) (based on a 15 year trend) is 28.2ha, as per the table below:

Employment Type	Projection (2021-38) based on 5 year trend (ha)	Projection (2021-38) based on 15 year trend (ha)
Office (B1a, B1b)	3.0	3.2
Industry (B1c, B2, B8)	10.9	13.1
Mixed (B1-B8)	5.6	11.2
<b>Total</b>	<b>20.3</b>	<b>28.2</b>

2.26 This need is broadly consistent with current commitment and allocations within the district. There is an existing pipeline supply as of 2021 for employment development (B Use Class) on sites with planning consent for a total of 28.5ha of employment land. In addition, there are a number of extant allocations for employment development (Policy EMP1) which provide 12.9 ha of development land.

<sup>5</sup> Confirmed within meeting between Tanvale Estates and Council on the 20<sup>th</sup> February 2024



2.27 The Draft Plan proposes to meet and exceed the district’s employment land requirement of 28.2ha and allocates 22.7ha (or 27.6ha)<sup>6</sup> of employment land and 12.2ha of mixed-use land (including office space). Whilst this is consistent with paragraphs 85 and 86 of the Framework and will assist in increasing the number of jobs within the district, Tanvale Limited would question whether this is excessive when considered alongside the districts 28.5ha of existing employment commitments. A review of the proposed allocations is necessary to understand whether the proposed allocations could be are more appropriate use given development needs and the availability of deliverable, sustainable sites, particularly within Alton.

2.28 Tanvale Limited consider that the Council should ensure the deliverability of the proposed allocations. The HEDNA acknowledges that both of the extant allocations for employment development within Alton (including the Site) have technical complexities associated with delivery, including issues associated with topography/ levels. Whilst Tanvale Limited agrees with the Council in seeking to address its employment needs, this should be done in a proportionate manner through directing the right development to the right locations. Employment entails a range of sectors, which require different scales of development.

2.29 In considering the specific uses of the proposed employment allocations, it is pertinent to acknowledge the districts performance in existing employment sectors. As of 2022, NOMIS has published the following data relating to the employee jobs by industry<sup>7</sup>:

Employee Jobs by Industry	East Hampshire (%)	South East (%)	Great Britain (%)
Mining And Quarrying	0.1	0.1	0.2
Manufacturing	10.5	5.9	7.6
Electricity, Gas, Steam And Air Conditioning Supply	0.2	0.3	0.4
Water Supply; Sewerage, Waste Management And Remediation Activities	1.0	1.0	0.7
Construction	5.8	5.0	4.9
Wholesale And Retail Trade; Repair Of Motor Vehicles And Motorcycles	18.6	15.0	14.0
Transportation And Storage	2.9	4.8	5.0

<sup>6</sup> It is noted that draft allocation ALT7 refers to a site area of 9.4ha, when in fact this site area relates to the boundary of the previous allocation (EMP1). The draft allocation ALT7 seeks to extend the site boundary, and therefore the site area referred to within this policy will need to be updated to reflect this. The Site’s outline planning consent (ref. 49776/004) refers to a site area of 14.3ha, which is reflective of the proposed boundary within ALT7

<sup>7</sup> <https://www.nomisweb.co.uk/reports/lmp/la/1946157301/report.aspx#tabempunemp>

Accommodation And Food Service Activities	7.0	7.5	8.0
Information And Communication	4.7	6.1	4.6
Financial And Insurance Activities	0.9	2.5	3.3
Real Estate Activities	1.4	1.7	1.9
Professional, Scientific And Technical Activities	9.3	9.6	9.1
Administrative And Support Service Activities	9.3	9.2	9.0
Public Administration And Defence; Compulsory Social Security	2.3	3.6	4.7
Education	10.5	9.9	8.6
Human Health And Social Work Activities	11.6	12.7	13.5
Arts, Entertainment And Recreation	2.3	3.0	2.4
Other Service Activities	2.1	2.0	2.0

2.30 This data demonstrates that employment encompasses range of sectors, and that East Hampshire district is performing well overall and has a strong presence of sectors including manufacturing, education, and wholesale and retail.

2.31 Tanvale Limited considers that for the Draft Plan to be supportive of objective A2 in providing a sustainable level of economic growth, the Council should carefully consider the need for additional employment allocations and the sectors they are intended to cater for. Where sites are identified, consideration should be given to the appropriate mix of development, to aid delivery and viability, foster a modern mixed use workplace environment on appropriate sites, and provide a broader base of employment opportunities alongside the core office, industrial and distribution sectors. Such sectors could appropriately include health and social care, hospitality and leisure.

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

### B1 – Built and Natural Environments

2.32 Objective B1 aims to ensure that new developments are located to maintain and improve the quality of built and natural environments, including our high-quality and valued built heritage and landscapes, whilst maintaining the integrity of existing settlements and their settings.

2.33 The Draft Plan's recognition of this as a key objective is in accordance with paragraph 20 of the Framework, which states that strategic policies should set out an overall strategy and make sufficient provision for the:

*“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.”*

2.34 The natural and historic environments should be conserved and enhanced, in line with Sections 15 and 16 of the Framework respectively.

2.35 The Draft Plan references that East Hampshire is predominantly rural and renowned for its attractive countryside. It has a wide diversity of landscapes supporting a wealth of important wildlife habitats and species, including protected and notable species and a large number of internationally, nationally and locally designated wildlife sites. It also references that the Draft Plan area has a rich and varied heritage that provides depth of character to the local environment.

2.36 The Draft Plan states that new development should be designed and located to protect and enhance valued and high-quality landscapes, particularly the setting, essential characteristics, tranquillity and special qualities of the South Downs National Park, ensuring that development is sensitive to their significance. It also emphasises that protecting and enhancing the historic environment is an important part of sustainable development.

2.37 Regarding draft allocations, the Draft Plan has been undertaken to ensure that appropriate environmental objectives have been considered when selecting sites. It outlines that development at key allocations, including the Site, must also respond to landscape sensitives and heritage assets. As discussed later in these representations, the allocation of the Site could positively address these constraints and provide the opportunity to deliver a high-quality attractive new development within Alton.

### B3 – Climate Change

2.38 Objective B3 aims to ensure that new development prioritises the achievement of net-zero carbon emissions, whilst being resilient to the impacts of climate change and delivering the ten characteristics of well-designed places.

2.39 The Draft Plan's recognition of this as an objective is in accordance with paragraph 159 of the Framework states that:

*“New development should be planned for in ways that:*

- a) avoid increased vulnerability to the range of impacts arising from climate change; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design.”

2.40 Objective B3 underlines the need, amongst other things, to locate development in sustainable, walkable locations and to make use, where possible of existing infrastructure. Delivering new development in sustainable locations is key to creating sustainable developments and reducing greenhouse gas emissions. GI and tree retention / planting must also be integrated into development to improve resilience to climate change impacts.

#### B4 – Living Local

2.41 Objective B4 aims to enable 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.

2.42 The Council declared a climate emergency in July 2019. The Draft Plan will focus new development in the most sustainable parts of the Draft Plan area where the greatest opportunities occur for residents to “live locally”, reducing the need to travel by the private car and instead engage in greater amounts of shorter journeys by walking and cycling.

2.43 In this context it is necessary to note that the Department for Transport’s ‘Transport and Environment Statistics’, published on 20<sup>th</sup> October 2022<sup>8</sup>, outlines that (inter alia) transport is the largest emitting sector of greenhouse gas emissions, and was responsible for 24% of the UK’s total greenhouse gas emissions in 2020, and that: “cars emit more GHGs per passenger mile than trains and coaches”.

2.44 To achieve Objective B4, the spatial strategy, site selection and land use allocation process adopted by the Draft Plan must be underpinned by the aim of creating opportunities to access services, facilities and employment by active and sustainable travel modes. This is also the approach advocated by the Framework, with paragraph 109 stating that (inter alia) “significant development should be focused on locations which are or can be made sustainable” and paragraph 110 stating that planning policies should (inter alia): “support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed”.

2.45 It is clear that the most effective means of responding positively to reducing the need to travel and promoting living local is to ensure that new development is delivered in locations where there is the greatest potential to encourage sustainable lifestyles and reduce travel demand, which is the key contributor to greenhouse gas emissions and therefore an accelerator of climate change. It is essential that the Draft Plan reflects this through its spatial strategy and selection of site allocations, which should include sites able to deliver a mix of uses that will help to reduce the need to travel, in accordance with the Framework.

## Summary

2.46 Tanvale Limited broadly support the Council's vision and objectives to deliver sufficient housing and employment development on sites which provide sustainable and active travel options along with maintaining and improving the quality of built and natural environments. However, in delivering on these objectives in a manner consistent with the Framework, Tanvale Limited consider that the Council should:

- Ensure the deliverability of the housing allocations (in accordance with objective A1);
- Take a proactive approach to identifying sites for later living (in accordance with objective A1);
- Take a broader view of employment and how the need for jobs can be met across a range of sectors (in accordance with objective A2);
- Ensuring that the extent of employment allocations reflecting likely requirements, focussing investment and delivery (in accordance with objective A2);
- Ensuring the deliverability of its employment allocations through considering the appropriate mix of development (in accordance with objective A2);
- Ensuring site allocations are located to protect and enhance valued and high-quality landscapes (in accordance with objective B1); and
- Locate development in sustainable, walkable locations and to make use, where possible of existing infrastructure (in accordance with objective B3 and B4).

### 3. Spatial Strategy

- 3.1 The Draft Plan's spatial strategy set's out the distribution of development within the Draft Plan area and provides the framework to deliver the growth that is necessary to meet the existing and future needs for all types of development.
- 3.2 Policy S1 'Spatial Strategy' sets out that over the plan period (2021-2040), the Draft Plan will make provision for the delivery of at least 9,082 new homes, equivalent to 478 homes per annum. It also states that employment needs (office, light industrial, industrial and warehousing) will be met through the intensification of existing strategic employment zones and local employment sites, as well as the delivery of additional employment floorspace that is compatible with residential use in existing centres. All retail needs will be met within existing centres.
- 3.3 Policy S2 'Settlement Hierarchy' ensures that new development continues to be directed to the more sustainable settlements and is appropriate for the settlement in question. The settlement hierarchy takes account of the potential for accessing key services and facilities by walking and cycling. Alton is designated as a Tier 1 settlement, which is the most sustainable settlement within the hierarchy.
- 3.4 Policy S2 also sets out that the settlements identified within the hierarchy have a Settlement Policy Boundary ('SPB') as identified on the Policies Map, and that there is a presumption in favour of sustainable development within the SPB.
- 3.5 Chapter 12 confirms a total of 42 sites are being proposed for new development within the Draft Plan. Taken together, they provide an expression of the spatial strategy. The distribution of sites has been informed by the settlement hierarchy, with a greater proportion of development in the larger and more sustainable settlements. Notably, Alton is allocated 1,700 new homes (as per Policy H1) and 14.2ha (or 19.1ha<sup>9</sup>) employment land (as per Policy E2).
- 3.6 Section 2 of the Framework considers achieving sustainable development. Paragraph 7 states that:

*"The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner."*

- 3.7 Paragraph 11 discusses the presumption in favour of sustainable development and states that:

*"For plan-making this means that:*

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment;*

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<sup>9</sup> It is noted that draft allocation ALT7 refers to a site area of 9.4ha, when in fact this site area relates to the boundary of the previous allocation (EMP1). The draft allocation ALT7 seeks to extend the site boundary, and therefore the site area referred to within this policy will need to be updated to reflect this. The Site's outline planning consent (ref. 49776/004) refers to a site area of 14.3ha, which is reflective of the proposed boundary within ALT7

*mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

*b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.”*

3.8 It is clear that in its spatial strategy, the Council has had regard to encouraging development in locations with strong access to key services and facilities, and sustainable travel connections, which accords with paragraphs 7 and 11 of the Framework.

3.9 Tanvale Limited agrees that the proposed concentration of strategic growth within Alton would provide an opportunity to consolidate its position as a Tier 1 settlement.

### Proposed Housing Allocations

3.10 The identified requirement for Alton (1,700 units) is intended to largely be met through the following greenfield allocation:

- ALT8 – Land at Neatham Manor Farm;
- ALT1 – Land at Brick Lane; and
- ALT4 – Land at Whitedown Lane.

3.11 In order to further assess the merits and areas of concern relating to housing distribution within the Draft Plan’s spatial strategy, we have provided a review of these allocations providing a basis for considering the appropriate role that the Lynch Hill site can perform in meeting local needs.

### ALT8 – Land at Neatham Manor Farm

3.12 Draft allocation ALT8 proposes approximately 1,000 dwellings alongside new areas of open space, neighbourhood amenities (a shop and pub) and the potential for a new primary school.

3.13 The large-scale urban extension to the east of Alton offers the opportunity to masterplan a new neighbourhood and community comprehensively and would provide a substantial contribution towards addressing the district’s housing needs.

3.14 The Council’s Interim Sustainability Appraisal (February 2021) provides an assessment of potential landscape impacts of development at Neatham Down, stating that the A31 represents a natural and durable eastern boundary feature for the built area of Alton as all development in the town lies west of the road. Development at Neatham Down would breach this boundary and would require a new and less durable eastern boundary to be delivered through the development process. The site is considered to be ‘out of the ordinary’, having a medium to high value in landscape terms, although it is not considered to be part of the setting of the National Park. This would be considered contrary to objective B1 of the Draft Plan.

3.15 The site was assessed within the East Hampshire Accessibility Study (January 2024) and gained an average score of 8 relating to ‘Living Locally Accessibility Score’, ranking 55<sup>th</sup> most accessible out of the 64

development option sites assessed within the study. The Lynch Hill Site was also assessed within this study, gaining an average score of 14 and ranking as the 24<sup>th</sup> most accessible site.

- 3.16 The Interim Sustainability Appraisal states that Neatham Down is *“peripheral or distant from existing services”* and its location is *“considered to be more problematic ....in terms of the level of intervention required to improve accessibility and in terms of the number of existing residents who would benefit from facilities delivered on site.”*
- 3.17 In addition, the Council itself has confirmed that the A31 *“provides a physical and psychological barrier [and] would hinder the integration of a new community with Alton.”*<sup>10</sup>
- 3.18 Tanvale Limited supports the Council’s logic in allocating a large proportion of the districts housing to a sustainable location within its only Tier 1 settlement.
- 3.19 Draft allocation ALT8 would no doubt have significant landscape impacts and be contrary to objective B1 of the Draft Plan. Whilst it is also acknowledged that due to the constrained nature of the district, there will inevitably be levels of landscape harm if the Council is to address its development needs. However, it remains reasonable to direct new development towards sites which will cause the least amount of harm whilst providing meaningful development. The Neatham site would appear to perform poorly in this respect.
- 3.20 Tanvale Limited notes that the Council has previously been critical the site’s poor accessibility given the lack of existing infrastructure and brought into question whether the scale of development in this location is self-sustaining. The allocation is evidently contrary to objectives B3 and B4 of the Draft Plan.
- 3.21 It is worth highlighting the long-term timescales for delivery of this allocation. Whilst long term this site may provide a significant contribution to addressing the Council’s housing needs in accordance with objective A1, there is still a requirement for a shorter solution which are delivered in a timely fashion and sustains the supply of housing.

### **ALT1 – Land at Brick Lane**

- 3.22 Draft allocation ALT1 proposes 150 dwellings on land directly north of the A339 (Basingstoke Road).
- 3.23 The site partly adjoins Alton settlement boundary to the east; however, it is partly located within the parish of Beech and falls within its Neighbourhood Development Plan (adopted June 2021) (‘NDP’) boundary.
- 3.24 The draft policy acknowledges that there is potential for adverse visual and landscape impacts due to the site’s prominent position at the edge of Alton.
- 3.25 The site is partly located within the NDP designated non-coalescence area. Policy BPC03 of the NDP states that development will not be permitted in the non-coalescence area, if individually or cumulatively, it

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<sup>10</sup> <https://easthants.moderngov.co.uk/documents/g3773/Public%20reports%20pack%2023rd-Sep-2021%2018.00%20Council.pdf?T=10>



would result in reducing the visual and/or physical separation between Beech and Alton or otherwise diminish their separate and distinctive identities.

3.26 The proposed allocation would seek to amend the settlement boundary, and the Draft Plan proposes a new Settlement Gap (as per draft Policy NBE11), which is significantly reduced in comparison to NDP Policy BPC03 and would unescapably result in major landscape impacts.

3.27 It is worth noting that the Council's Interim Settlement Policy Boundary Review Background Paper (January 2024) establishes a set of principles that will be used when reviewing and refine settlement boundaries as part of the Draft Plan process. Principle 3 sets out:

*"Settlement boundaries will exclude important gaps e.g. the open gaps between developed areas should be retained."*

3.28 In terms of accessibility, the site is located to the outskirts of Alton and approximately 1,300m from Alton Town Centre; 1,300m from a doctor's surgery; 800m from a primary school; 1,500m from a supermarket; 10m from a bus stop; and 2,300m from Alton railway station.

3.29 The site was assessed within the East Hampshire Accessibility Study and gained an average score of 12 relating to 'Living Locally Accessibility Score', ranking 34<sup>th</sup> most accessible out of the 64 development option sites assessed within the study. The Lynch Hill Site was also assessed within this study, gaining an average score of 14 and ranking as the 24<sup>th</sup> most accessible site.

3.30 The site is subject to a number of environmental constraints, including:

- The site is partly located within Flood Zones 2 and 3 to the south east, and southern areas are susceptible to fluvial and surface water flooding associated with the River Wey and its source;
- SINCs are located within the south-west corner of the site and to the north, just beyond the site boundary; and
- The site is located adjacent to an ancient woodland.

3.31 Tanvale Limited supports the Council in addressing the short-term housing needs of Alton through allocating sites which can come forward quickly and provide a meaningful contribution towards housing figures.

3.32 As noted earlier, Tanvale Limited considers it inevitable that any meaningful housing allocations will be subject to some landscape impacts given the constrained nature of the district. However, Tanvale Limited reemphasises that the Council should be directing this development towards sites which will cause the least amount of harm.

3.33 At present, the site is a meaningful buffer between Alton (a Tier 1 settlement) and Beech (a Tier 5 settlement), and its development would not only cause significant landscape harm but is conflicting with the Council's own guidance.

3.34 In view of the Draft Plans objectives, draft allocation ALT1 is contrary to objective B1, in ensuring that new developments are located to maintain and improve the quality of natural environments. As stated above,

it is evident that the coalescence of settlements would have major landscape harms. Regarding objectives B3 and B4, it is considered that the site is sustainably located.

3.35 When considered alongside the site's environmental constraints, Tanvale Limited would argue that there are other more suitable and sustainable sites available for residential development, which would avoid the coalescence between Alton and Beech, and support the Draft Plan's objectives.

#### ALT4 – Land at Whitedown Lane

3.36 Draft allocation ALT4 proposes 90 dwellings on land directly south of the A339 (Basingstoke Road).

3.37 The site partly adjoins Alton settlement boundary to the north; however, it is located within the parish of Beech and falls within its NDP boundary. The site is fully located within the designated NDP non-coalescence area.

3.38 In terms of accessibility, the site is located to the outskirts of Alton and approximately 1,300m from Alton Town Centre; 1,300m from a doctor's surgery; 800m from a primary school; 1,500m from a supermarket; 100m from a bus stop; and 2,300m from Alton railway station.

3.39 The site was assessed within the East Hampshire Accessibility Study and gained an average score of 13 relating to 'Living Locally Accessibility Score', ranking 31<sup>st</sup> most accessible out of the 64 development option sites assessed within the study. The Lynch Hill Site was also assessed within this study, gaining an average score of 14 and ranking as the 24<sup>th</sup> most accessible site.

3.40 The site is subject to a number of environmental constraints, including:

- parts of the site are susceptible to surface water flooding along its northern and western boundaries; and
- the site is adjacent to a SINC and ancient woodland.

3.41 Tanvale Limited supports the Council in addressing the short-term housing needs of Alton through allocating sites which can come forward quickly and provide a meaningful contribution towards housing figures.

3.42 Tanvale Limited considers it inevitable that any meaningful housing allocations will be subject to landscape impacts given the constrained nature of the district. However, Tanvale Limited reemphasises that the Council should be directing this development towards sites which will cause the least amount of harm.

3.43 At present, the site is a meaningful buffer between Alton (a Tier 1 settlement) and Beech (a Tier 5 settlement), and its development would not only cause significant landscape harm but is conflicting with the Council's own guidance.

3.44 In view of the Draft Plans objectives, draft allocation ALT1 is contrary to objective B1, in ensuring that new developments are located to maintain and improve the quality of natural environments. As stated above, it is evident that the coalescence of settlements would have major landscape harms. Regarding objectives B3 and B4, it is considered that the site is sustainably located.

3.45 When considered alongside the site's environmental constraints, Tanvale Limited would argue that there are other more suitable and sustainable sites available for residential development, which would avoid the coalescence between Alton and Beech, and support the Draft Plan's objectives.

### Lynch Hill, Proposed Allocation

3.46 In order to further assess the relative merits of Lynch Hill in meeting the development needs as part of the spatial strategy, we have provided a review of draft site allocation ALT7 (Lynch Hill).

### ALT7 – Land at Lynch Hill

3.47 The Draft Plan allocates the Site under Policy ALT7, which proposes employment use including industrial, storage and distribution with opportunity for complementary commercial use.

### Suitability

3.48 The Site is sustainably located on the edge of Alton and with the potential for an access on to Montecchio Way already confirmed it is approximately 1,300m from Alton Town Centre; 1,100m from a doctor's surgery; 1,000m from a primary school; 700 m from a secondary school; 600m from two supermarket (or around 300 m via an existing pedestrian bridge over the River Wey); 700m from an existing bus stop; and 1,000m from Alton railway station.

3.49 The Site was assessed within the East Hampshire Accessibility Study and gained an average score of 14 relating to 'Living Locally Accessibility Score', ranking 24<sup>th</sup> most accessible out of the 64 development option sites assessed within the study. It is worth noting that this concludes that the Site is a more accessible location than draft allocations ALT1, ALT4 and ALT8.

3.50 The Site is not subject to any environmental constraints; it is located within Flood Zone 1; there are no statutory or non-statutory sites of nature conservation importance on or adjacent to Site; and it does not contain any TPO's.

3.51 There are a number of Grade II Listed buildings to the northeast of the Site, however the northern boundary of the Site forms a defensible and screened boundary.

3.52 The Council's Interim Sustainability Appraisal states that views into the Site from land to the west are limited, given the woodland. All but the small part of the Site that is on the north facing slope of Lynch Hill is visible from a short stretch of the A31 where the road is level with the Site, although this could be reduced with additional screening.

3.53 Based on the above, it is reasonable to conclude that the Site is compliant with objectives B1 and B4 of the Draft Plan.

3.54 In term of the Site's planning history:

- The southern part of the Site is allocated within the Council's Housing and Employment Allocations (adopted April 2016) under Policy EMP1 (Land at Lynch Hill). This allocation is for about 7ha of employment land within the overall site area of 9.4ha.

- The whole Site (14.3ha) benefits from outline planning approval (ref. 49776/004) for development of up to 7ha of employment land (use classes B1a, B1c, B2 and B8) with associated access (submitted for detailed approval) and green infrastructure. This application was approved in June 2020, and subsequently a reserved matters application was submitted in June 2023 and is currently being progressed.

3.55 It is therefore evident that the Council accepts the suitability of the Site for development, and considers its performance as well as some important key aspects, notably accessibility, better than other proposed allocations in Alton.

### Settlement Boundary

3.56 Tanvale Limited supports the settlement boundary amendment within the Draft Plan to include the whole Site and considers that development of the whole Site would fill in the gap between the existing commercial area and the A31, which would then form a defensible boundary for the long term. In addition to this, should draft allocation ALT8 be retained and adopted by the Council, this will further cement the Site's position within the settlement boundary.

### Land Use

3.57 Tanvale Limited broadly supports the provision of employment land within the district through the intensification of existing strategic employment zones (as per draft Policy S1). Given the Site's location adjacent to Mill Lane Industrial Estate and Alton Retail Park, it is considered that the Site forms a logical location for the provision of employment land. However, in considering how the Site can best serve the Draft Plan objectives, Tanvale Limited would question the extent of allocated employment land at ATL7 given the Council's seemingly sufficient supply of employment land (as suggested at paragraph 2.27), and indeed raises concerns over allocated employment sectors which the Site it is intended to cater for.

3.58 Tanvale Limited has confirmed support for the need to address the short-term housing delivery within Alton through allocating suitable and sustainable sites which can come forward quickly and provide a meaningful contribution towards housing and specialist housing figures. Tanvale Limited invites the Council to consider whether Site would better support the objectives of the Draft Plan through providing an element of residential development (including market, affordable or specialist housing) in addition to the provision of employment land (B Use Class). How a proposal of this nature may take form and its associated benefits are discussed in more detail at Section 5 of this representation.

3.59 However, should the Council consider that the Site is largely suitable for employment uses, Tanvale Limited would refer back to the review of employment land requirements in this representation. For the Draft Plan to effectively achieve a sustainable level of economic growth (objective A2), consideration should be given to the appropriate mix of development, to aid delivery and viability, foster a modern mixed use workplace environment on appropriate sites, and provide a broader base of employment opportunities alongside the core office, industrial and distribution sectors. With reference to the wording of ALT7, Tanvale Limited agrees with the Council in allocating flexible employment use and supports the commercial aspect of this allocation. However, Tanvale Limited strongly urges the Council to further increase the flexibility of ALT7, so that the Site can provide meaningful employment opportunities and assist those sectors which are

currently underperforming as well as those which currently benefit from a strong presence within the district.

### Conclusion

- 3.60 To conclude, Tanvale Limited supports the Council in encouraging development towards the districts most sustainable settlements and specifically Alton. Tanvale Limited support the Council's view that the Lynch Hill Site is sustainably located and suitable for development. However, Tanvale Limited are concerned that a number of proposed housing allocations which perform relatively poorly against key criteria and may compromise the delivery of strategic objectives.
- 3.61 Similarly, Tanvale Limited are concerned over the approach to employment land allocations and suggest that further consideration should be given to the overall quantity of allocated land. In addition, the approach to the land use mix on the allocated sites should support the delivery and creation of modern, mixed workplace environments.
- 3.62 In this context it is considered appropriate to review the potential contribution of Lynch Hill, a largely already committed site, to meeting the development needs of the district. The development potential of the Site is considered further in Section 5 of this representation.

## 4. Policy Review

### Policy H1 'Housing Strategy'

- 4.1 Policy H1 confirms that provision is made for about 3,500 new homes in the most sustainable and accessible locations in the Local Plan Area in accordance with the Settlement Hierarchy (Policy S2) and the following patterns of distribution:
- Tier 1 – 700 dwellings and strategic allocation of 1,000 dwellings
  - Tier 2 – 1,100 dwellings
  - Tier 3 – 600 dwellings
  - Tier 4 and 5 – 100 dwellings
- 4.2 As per Section 2 of this representation, Tanvale Limited considers that for the Draft Plan to effectively achieve objective A1, it should explore opportunities to exceed the minimum LHN figure to enhance the contribution to housing affordability issue and ensure a reliable delivery of housing to meet local needs.
- 4.3 Tanvale Limited supports the Council in directing new housing development towards the districts most sustainable settlements, in line with objective B1 of the Draft Plan. It is considered that the strategic allocation of 1,000 homes at Alton will provide a significant contribution to addressing the Council's housing needs in a sustainable location.
- 4.4 Tanvale Limited supports the Council in addressing the short-term housing needs of Alton through allocating sites which have the capacity to come forward quickly and provide a meaningful contribution towards housing figures. However, Tanvale Limited raises concerns over that suitability and sustainability of draft allocations ALT1 and ALT4, given they fail to support objective B4 of the Draft Plan.
- 4.5 Tanvale Limited contend that draft allocation ALT7 is potentially a more suitable and sustainable location for housing development, and this is considered further in Section 5 of this representation.

### Policy H5 'Specialist Housing'

- 4.6 Policy H5 states that proposals for specialist and supported housing that meets the needs of older persons or others requiring specialist care will be permitted:
- a. on sites within settlement boundaries; and
  - b. on sites in the countryside provided:
    - i. there is a proven local need for the development;
    - ii. this cannot be accommodated in the built-up area;
    - iii. the site is well related to an existing settlement with appropriate access to services and facilities either on or off site.

- 4.7 Tanvale Limited support the provision for specialist and supported housing in order to meet the estimated need for 1,597 additional dwellings with support or care, and 331 additional nursing and residential care bedspaces across the whole study area.
- 4.8 Tanvale Limited consider that Lynch Hill could provide the opportunity for specialist later living development and this is considered further in Section 5 of this representation.

#### **Policy E1 'Planning for Economic Development'**

- 4.9 Policy E1 supports new development for employment uses within the designated strategic employment sites.
- 4.10 Tanvale Limited supports the provision of employment land within the district through the intensification of existing strategic employment zones. However, as per Section 2, it is considered that the Council should explore opportunities to strengthen the presence of a range of sectors, including both those performing well and those which are underperforming. This will provide a more holistic offer employment opportunities within the district.

#### **Policy E2 'Maintaining and Improving Employment Floorspace'**

- 4.11 Policy E2 designates the strategic employment allocations (including the ALT7). This Policy further confirms at E2.1a that the development and regeneration of these sites will be supported to provide employment floorspace that meets the needs of the market, with a focus on improving productivity and job density.
- 4.12 Tanvale Limited supports the allocation of Land at Lynch Hill (draft allocation ALT7) as an employment site in principle, however, has concerns over the potential over allocation of employment land within the Draft Plan, as referred to earlier in this representation.
- 4.13 Tanvale Limited supports criterion E2.1a, which highlights that the employment allocations should provide employment floorspace that meets the needs of the market. In this context and to support the delivery employment land, Tanvale Limited urges the Council to further consider the creation of jobs across a broad range of sectors and to create modern workplace environments as a reflection within its proposed allocations.
- 4.14 Specifically relating these points to the Lynch Hill Site, the Council should seek to utilise the Site's gateway location into Alton and consider a mixed-use approach within the allocation. More broadly however, given the limitations of a number of housing allocations proposed in Alton, it may be more appropriate to consider a housing led strategy for the Site. It is understood that the Council has not previously considered housing an option at Lynch Hill, which would appear to be a significant oversight, however the review of these and other comments on the Regulation 18 consultation does provide an opportunity to address this omission.

### Policy E5 'Retail Hierarchy'

- 4.15 Policy E5 states that main town centre uses, as defined in the Framework, will be permitted within the defined town, district, local and neighbourhood centres. It also states that established retailing location at Alton Retail Park will be retained for retail activity.
- 4.16 The updated Retail Study (July 2023) states that whilst acknowledging the need for an additional 3,400 sqm gross of convenience/ comparison floorspace over the plan period, this could be accommodated through the re-occupation of vacant floorspace in defined centres and the delivery of the new town centre at Bordon.
- 4.17 Nonetheless, draft allocation ALT7 seeks to provide an aspect of commercial development, which is supportive of objective A2 of the Draft Plan in that it identifies a flexible and varied supply of land for business that is the right type and in the right location. Tanvale Limited supports this aspect of the allocation and refers back to earlier comments in this representation in urging the Council to further increase the land use flexibility of ALT7.

### Conclusion

- 4.18 To conclude, Tanvale Limited supports the Council in encouraging development towards the districts most sustainable settlements and specifically Alton. Tanvale Limited supports the Council in addressing the short to medium term housing needs of Alton through allocating sites which have the capacity to come forward quickly and provide a meaningful contribution towards housing figures. However, it is considered that a number of proposed allocations are compromising to the objective B1 of the Draft Plan and therefore consideration should be given the scope for residential as part of the development mix at Lynch Hill.
- 4.19 Tanvale Limited support the provision for specialist and supported housing and consider that Lynch Hill could provide the opportunity for specialist later living development.
- 4.20 Tanvale Limited supports the provision of employment land within the district through the intensification of existing strategic employment zones, however, question the over provision of allocated employment land and consider that the Council should explore opportunities to strengthen the presence of a range of sectors and this should be reflected within the site allocations.
- 4.21 Tanvale Limited supports the provision of commercial development within draft allocation ALT7 and considers that the Council is correct to promote a varied supply of land for business that is the right type and in the right location.



## 5. Land at Lynch Hill – Potential Development

5.1 In order to assist the Council in maximising the contribution that the Lynch Hill site can make to meeting development needs in the district and which will best meet the objectives of the Draft Plan, Tanvale Limited has prepared two illustrative masterplan scenarios. These comprise an employment and mixed used strategy and a housing led strategy. These are presented to demonstrate the potential of the site and provide a basis for further discussion and engagement with the planning authority on a site identified for development. Subject to how the Local Plan progresses and further discussions over the actual delivery of what is agreed to be a key, well located site, Tanvale Limited reserves its position in confirming a preferred strategy.

### Option 1 – Employment and Mixed-Use Development

5.2 This masterplan (shown at **Appendix 2**) focusses on a mixed-use development and can comprise:

- Employment and workspace uses broadly to the south of the Site to act as an extension to the Mill Lane Industrial Estate;
- Older persons specialist accommodation towards the centre of the Site with the scope for a care home or general housing;
- Commercial development (including potentially a gym, food and beverage, hotel, leisure, retail and/or roadside/ EV charging) to the north of the Site taking advantage of the Montecchio Way frontage;
- Structural landscape planting will form the boundaries of the Site, enhancing the integration of the Site into the wider landscape; and
- Access from the north of the Site off the B3004 Montecchio Way (as approved as part of outline planning application 49776/004) and to the south-west of the Site off the existing access from Waterbrook Road.

5.3 The benefits of this approach are:

- Provision of employment generating development which will create a large number of jobs within a range of sectors;
- Assisting in the viability and deliverability of the scheme as a whole, including the employment elements, creating a contemporary mixed use working and commercial environment;
- Assisting the Council in addressing its undersupply of older persons accommodation;
- Provision of usable services to the wider community of Alton through the development of complementary leisure and other uses;
- Development which would form a defensible settlement boundary for the long term;
- The high-quality development of a gateway location;
- Utilisation of existing and planned infrastructure;
- Provision of green infrastructure;
- Limited impacts on landscape through screening and considered design;

- Opening up opportunities to better utilise the adjacent River Wey and associated woodland corridor as an ecological and recreation resource, including providing pedestrian access over the River Wey via an existing footbridge; and
- Opening up recreational links to the open countryside to the east of the A31 via the existing footbridge, including to Golden Chair Hill and Neatham Down and the South Downs National Park beyond.

## Option 2 – Residential led

5.4 This masterplan (**shown at Appendix 3**) focusses on a residential led development and can comprise:

- In excess of 250 new homes subject to the agreed type and mix and further detailed design;
- The scope for specialist later living accommodation including a care home;
- The scope for an element of commercial / mixed use development such as hotel or leisure along the Montecchio Way frontage development to the north of the Site;
- Green planting will form the boundaries of the Site, enhancing the integration of the Site into the wider landscape; and
- Access from the north of the Site off the B3004 Montecchio Way (as approved as part of outline planning application 49776/004) and to the south-west of the Site off the existing access from Waterbrook Road.

5.5 The benefits of this approach are:

- The provision of a substantial number of new homes on a sustainably located site identified for developed;
- Potentially assisting the Council in addressing its undersupply of older persons accommodation;
- Development which would form a defensible settlement boundary for the long term;
- The high-quality development of a gateway location;
- Utilisation of existing and planned infrastructure;
- Provision of green infrastructure;
- Limited impacts on landscape through screening and considered design;
- Opening up opportunities to better utilise the adjacent River Wey and associated woodland corridor as an ecological and recreation resource, including providing pedestrian access over the River Wey via an existing footbridge; and
- Opening up recreation links to the open countryside to the east of the A31 via the existing footbridge, including to Golden Chair Hill and Neatham Down and the South Downs National Park beyond.

## 6. Conclusion

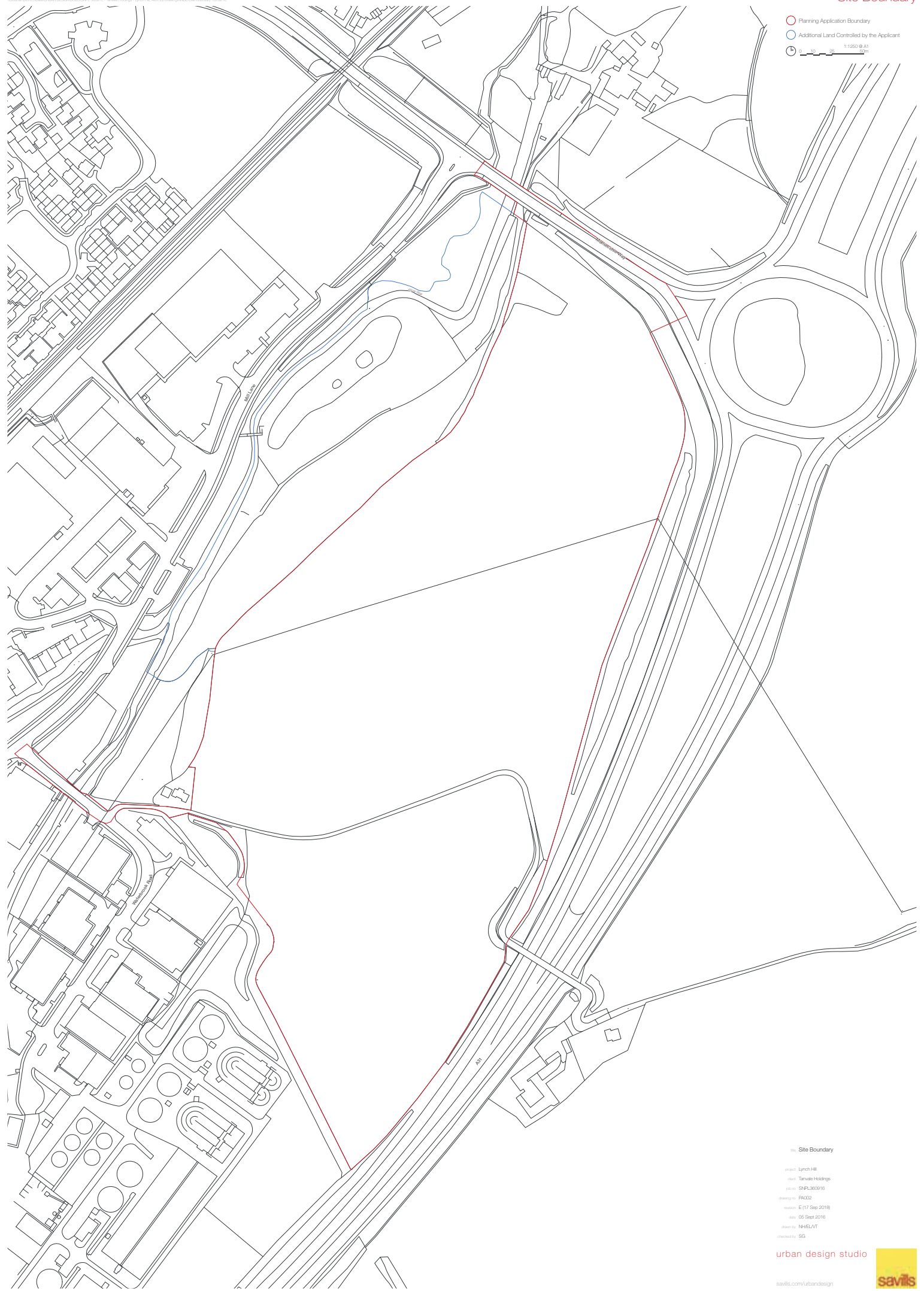
6.1 We trust this representation is helpful to the Council in the preparation of the Local Plan. Tanvale Limited look forward to working with the Council both on the Local Plan and to deliver development on the Lynch Hill site to meet the needs of the district and local community in a sustainable location.

6.2 In that context, we conclude this representation as follows:

- Tanvale Limited are supportive of the objectives of the Draft Plan including the commitment to meeting the district's housing and employment needs through delivering development in its most sustainable locations, specifically within Alton.
- Tanvale Limited are supportive of the Council's view that the Lynch Hill Site is sustainably located and suitable for development. Given the nature of the Site its development can deliver a number of benefits, including providing new and improved pedestrian and recreational links along the River Wey corridor and over to Golden Chair Hill and Neatham Down and the South Downs National Park beyond.
- Tanvale Limited supports the settlement boundary amendment within the Draft Plan to include the whole Site and reflecting the reasonable extent of the Alton urban area and the clear boundary of the A31, which would then form a clear boundary for the long term.
- Tanvale Limited is broadly supportive of the quantum of proposed housing allocations in Alton and supports the Council in addressing the short and medium term housing needs of Alton through allocating sites which can come forward quickly and provide a meaningful contribution towards housing figures. However, Tanvale Limited are concerned about the consistency of allocations at Neatham and Basingstoke Road with the objectives of the Draft Plan. Tanvale Limited note that the Lynch Hill Site is considered by the Council to be more accessible than these proposed allocations. It is considered that the housing land allocation strategy should be reviewed. In this context, it is considered that consideration should be given to the delivery of housing on the Lynch Hill Site.
- Tanvale Limited is not persuaded that the amount of proposed additional employment land is required given the Council's existing pipeline supply and considers that the employment land allocation strategy should be reviewed (alongside the housing strategy) and the potential of Lynch Hill considered in that context. However, should the employment allocation of the Lynch Hill Site be maintained in favour of a housing led approach, then a mixed-use strategy should be reflected in the Local Plan allocation. This would not only support the delivery of the Site but support the creation of a broader range of job opportunities and the creation of a modern workplace environment, whilst meeting wider development needs.

## Appendix 1 - Outline Approval (ref 49776/004) Site Plan (ref PA002 Rev E)

- Planning Application Boundary
- Additional Land Controlled by the Applicant
- 0 10 20 1:1250 @ A1



Site Boundary  
Lynch Hill  
Tinsdale Holdings  
SNPL20016  
PR022  
E 17 Sep 2018  
05 Sept 2016  
NH/ELVT  
SG

## Appendix 2 - Lynch Hill – Employment and mixed-use development option



**Project: Lynch Hill**

**Title: Employment and mixed-use development option**

**BroadwayMalyan™**

## Appendix 3 - Lynch Hill – Residential led option





Project: Lynch Hill  
Title: Residential led option

BroadwayMalyan™



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T 0118 214 9340

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**From:** [REDACTED]  
**Sent:** 06 March 2024 09:18  
**To:** [EHDC - Local Plan](#)  
**Subject:** Orchard Homes & Developments Limited - RE: Local Plan Representation V3 East Hampshire Draft Local Plan - 22 January 2024 to 4 March 2024  
**Attachments:** [Local Plan Representation V3..pdf](#)

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

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

Dear [REDACTED]

Many thanks for your reply and confirming the extension of time.

As such, please find attached my representation including images to be taken into consideration for the East Hampshire Draft Local Plan - 22 January 2024 to 4 March 2024 under Sections: -

PART D SITES AND DRAFT POLICIES MAPS  
PM2 Draft Policies Maps

SUPPORTING EVIDENCE AND GENERAL FEEDBACK  
'Background Papers' Section  
B5 Settlement Policy Boundary Review

Once again thank you for your email it is most appreciated.

---

**From:** EHDC - Local Plan <LocalPlan@easthants.gov.uk>  
**Sent:** Wednesday, March 6, 2024 9:02 AM  
**To:** [REDACTED]  
**Subject:** RE: Local Plan Representation V3 East Hampshire Draft Local Plan - 22 January 2024 to 4 March 2024

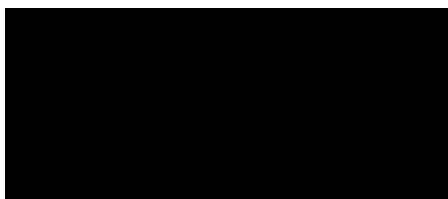
Good morning [REDACTED]

Thank you for your email.

The deadline for submissions has been extended until this Friday 8<sup>th</sup> March at 5pm.

You can submit a response with an attachment via this email address.

Kind Regards



East Hampshire District Council  
Penns Place  
Petersfield  
GU31 4EX

[LocalPlan@easthants.gov.uk](mailto:LocalPlan@easthants.gov.uk)

01730 234102

---

**From:** [REDACTED]  
**Sent:** Thursday, February 29, 2024 2:13 PM  
**To:** EHDC - Local Plan <[LocalPlan@easthants.gov.uk](mailto:LocalPlan@easthants.gov.uk)>  
**Subject:** Local Plan Representation V3 East Hampshire Draft Local Plan - 22 January 2024 to 4 March 2024

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

Dear Sir or Madam

I am looking to add comments on to the East Hampshire Draft Local Plan - 22 January 2024 to 4 March 2024 as well as an attachment under 'Have your say' but I cannot see a link that enables me to upload the document attached?

<https://ehdclocalplan.commonplace.is/>

Is there a way of doing this?

I look forward to hearing from you before the deadline for submission on 4<sup>th</sup> March.

Kind regards



# Orchard

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## **Land at Aurea-Norma**

East Hampshire Regulation 18 Local Plan Representation



## Contents

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3.	Contextual analysis .....	5
4.	Ropley Neighbourhood Plan .....	12
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## 1. Statement of Purpose

- 1.1. I write with reference to Settlement Boundary Review Paper and the resulting Draft Policies Maps, with particular reference to Ropley and land at Aurea Norma, formerly part of the Regulation 19 draft Local Plan allocation SA30.
- 1.2. The representation provides an assessment of the conditions on the ground in respect of the current settlement boundary, a brief history of the settlement boundary as part of the previous iteration of the Local Plan, and finally a suggested way forward to present a sound approach to reflecting the conditions as they exist in defining the edge of the settlement.
- 1.3. The submission provides the evidence base for a revision to the emerging Local Plan to adjust the settlement boundary of Ropley Dean to appropriately reflect the characteristics and land uses on the ground.



## 2. Previous Allocation

2.1 The land subject to this representation formed part of the former draft Local Plan allocation SA30, which was identified to deliver between 55 and 76 dwellings during the course of the Plan Period.

2.2 The land as edged in red and defined by Policy SA30 consisted of part brownfield, part residential and part greenfield, the latter of which covered the northern most extent of the then emerging allocation.

**Figure 1: SA30 Site Allocation**



2.3 At that time, it was recognised by the Sustainability Appraisal that such sites provide an important role for the more rural settlements, with Para 9.41 of the SA specifically referencing SA30 in stating that;

*'In general terms, by avoiding dispersed growth across the rural areas and smaller settlements of the District the spatial strategy broadly directs growth away from the least sustainable locations. This does not preclude some allocations coming forward in lower tier settlements, such as site SA30 in Ropley [my emphasis], and it is important to note that such sites have an important role to play in ensuring the viability and vitality of more rural settlements. However,*



*in general, concentrating development at the larger settlements which offer a wider range of services is considered more likely to reduce the distance residents must travel to meet their needs'. Sustainability Appraisal (SA) of the emerging East Hampshire Local Plan (December 2018).*

- 2.4 The principles as expressed within the SA in 2018 remain sound, and therefore it is disappointing to see such an important allocation removed from the published Draft Local Plan.

### 3. Contextual analysis

- 3.1. The following section of the representation concerns the status of the land and its characteristics. As noted previously, SA30 comprised a combination of brownfield, residential and greenfield land, with the land subject to this representation excluding the latter. Combined, the red and the blue land as edged make up the curtilage of the residential property Aurea-Norma and a former Builders Yard.

**Figure 2: Location Plan**



- 3.2. The Red land is the subject of a current Planning Application (55041/001) for 5 residential properties, with the site layout shown in Figure 3.

Figure 3: Planning Application 55041/001



- 3.3. As per Figure 2, the layout has as per best practice allowed for a future small extension to the north to facilitate residential development within the land previously defined within SA30, albeit not extending beyond the boundary of the land associated with the residential use.
- 3.4. There follows a series of photographs that assist in understanding both the context of the land, but also the containment of the land from a landscape perspective and relationship with the neighbouring land uses.

Figure 4: Settlement boundary and picture locations



Picture 1: View looking south from the site across the former builder's yard and access



- 3.5. The subject land is served by the existing access, which falls within the settlement boundary and crosses the land formerly used as the builder's yard. No secondary access is required, that would extend the settlement boundary any further than the boundaries as they are currently defined.

**Picture 2: View looking east towards housing within settlement boundary.**



- 3.6. Residential properties sit to the west of the subject site and represent existing built form that extends along the entirety of the boundary to its northern most point. The vegetation on the righthand side of the picture represents the northern boundary of the subject site, which can be seen more clearly in Picture 3.

**Picture 3: View looking north across established boundary.**



- 3.7. The vegetation marks a clear distinction between the open greenfield to the north, and the residential curtilage from within which the photograph was taken.
- 3.8. To the left of the image the existing properties extending along the western boundary of the site can be seen, also terminating at this northern boundary.
- 3.9. As per Picture 4, a similar relationship exists when viewed to the east, with housing extending along the eastern boundary.

**Picture 4: View east towards housing within Colebrook Field**



- 3.10. Again, with the photograph taken within the curtilage of the residential property, when looking east the context is one of residential development abutting the land, with a defined boundary enclosing the land in question.
- 3.11. With a clear distinction between the land to the north and residential development to the east and the west, it is the case that the context of the land is that of a parcel within the confines of the settlement boundary of Ropely Dene.
- 3.12. Picture 5 is taken looking south across the settlement boundary, which cuts across the land before the house.



**Picture 5: View across settlement boundary divide**



- 3.13. As currently drawn and evident from Picture 5, the settlement boundary is arbitrary in nature and does not follow any clear path or boundary marker, and at present, disregards the continuation of the same character and curtilage of the property to the north.
- 3.14. In this instance, the curtilage of the property does not extend beyond the envelope of the built form of the village, which can be the case on occasion and could be a reason for excluding part of a curtilage from the settlement boundary. However, as evident from Pictures 2,3 and 4, the built form of the village extends to the furthest extent of the property, and therefore no such encroachment into the countryside exists. On the contrary, the current 'countryside' Local Plan designation of the rear portion of the property is enclosed on two sides by residential use and the built form of the village.



## 4. Ropley Neighbourhood Plan

4.1. Adopted in 2019, the Neighbourhood Plan follows the as proposed settlement boundary within the emerging Local Plan.

4.2. The methodology used as part of the Neighbourhood Plan to review the settlement boundary of Ropley Dean is set out within the supporting document '*Interim Settlement Policy Boundary Review Background Paper*' (January 2024), as set out below:

*In discussions with the Local Planning Authority and using the Interim Methodology Paper as an initial guidance, the 'made' neighbourhood plan, in Ropley, resulted in amendments to the SPB. Where amendments to the SPB have been made, the general approach was to draw the revised boundary 10 metres behind the relevant rear or side wall of the main dwelling house to prevent back land development. To avoid making petty deviations from physical boundary features, this criterion was only applied where the furthest point of the curtilage is 20 metres or more from the closest wall of the main dwelling house to the boundary. Where boundary features on the ground run within 5 metres of the proposed resulting line, then they have been followed instead. This principle was not applied where it would result in minor, isolated bites being taken out of otherwise strong and straight settlement edges. (Para 3.21).*

4.3. There are two points relevant to the subject site concerning this methodology. The first concerns the mathematical approach to marking the distance of the settlement boundary from a property. This approach is often used to avoid varied encroachment into the countryside where the rear curtilage of the property extends beyond what would otherwise be a strong, and straight settlement edge. Indeed, the methodology states that where there was a strong and straight settlement edge, it was not necessary to apply this mathematical approach.

4.4. As per Figure 5, there is consistency between the end of the curtilage of the subject site and the current extent of built form within the village and the northern most point of the settlement boundary in this location. As such, any extension of the settlement boundary to the rear of the property would not thereafter extend the settlement boundary any further than it is currently formed.

4.5. The second point concerns the approach of seeking, strong and straight settlement edges. The settlement boundary at this location traverses east / west on a straight edge; a position that would continue on a straight edge, and then return to the south, not extending or varying the settlement boundary any further north should the land subject to this representation be drawn within the settlement boundary.

4.6. The resulting amendment as shown in yellow would not extend the settlement boundary any further north, south, east or west than which already exists at Ropley Dean (red), and follow

straight and defined settlement edge representing a logical amendment to the settlement boundary in line with the methodology as noted.

**Figure 5: Comparison between existing and proposed settlement boundaries**





## 5. Amending the settlement boundary

- 5.1. It is noted that the Settlement Boundary Review document is an interim document to support the current stage of the Local Plan, with its purpose being to set out the methodology and principles upon which East Hampshire's (outside the South Downs National Park) Settlement Policy Boundaries have been reviewed. It is noted within the document of importance that *'any amendments to the settlement policy boundaries can be justified and are supported by clear evidence'*. This principle would of course apply to those amendments being omitted.
- 5.2. We know that the LPA has previously concluded that the land does not form an important countryside function given it was identified within the former SA30 for residential development. We also know from its description at the time that it was not considered 'countryside', with the land under the control of Orchard Homes formed of the residential curtilage and brownfield land.
- 5.3. In removing the previous SA30 allocation from the Local Plan, the non-countryside land has also been removed. While the merits of allocation SA30 can be debated in the context of the approach supported by the Council's previous Sustainability Appraisal and supporting more rural communities, a more straightforward approach would be an amendment to the settlement boundary as edged in yellow shown within Figure 5.
- 5.4. As previously noted, there exists a live planning application on the southern portion of the land in the control of Orchard Homes for 5 dwellings within the settlement boundary. This planning application has been designed to support a small future extension to the north, which as per the pictures provided, would be within the defined boundaries of the house and would not extend the settlement boundary any further north, east or west than which currently exists.
- 5.5. Moreover, this extension of circa 4 / 5 dwellings would provide a small, but important contribution towards future housing stock within the village and within the confines of existing built form.
- 5.6. It is noted that the Neighbourhood Plan is due to be reviewed in the months ahead, albeit one can expect a strong lead to be taken from the parent document being the Local Plan. This minor change to the settlement boundary within the Local Plan, as is proposed across many of the towns and villages within the District outside of the National Park, would provide the catalyst for the discussion to commence locally of the type and form of housing to be delivered within this portion of the land, and within the heart of Ropley Dean.
- 5.7. We would respectfully ask therefore that the settlement boundary be amended within the emerging Local Plan Policy Maps for Ropley as edged in yellow within Figure 5.




## East Hampshire Draft Local Plan 2021-2040



Sat 02/03/2024 16:46



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

 2 attachments (273 KB)

East Hampshire LP letter.pdf; , with Parsonage Farm, Catherington.jpeg;



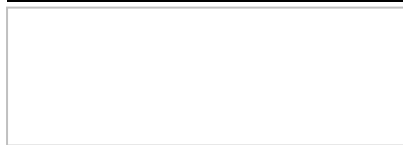
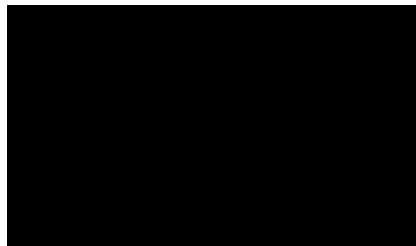
**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

Please find attached a letter of representation on behalf of my clients,   
, on two specific aspects of the East Hampshire Draft Local Plan 2021-2040 - the issue of the, as yet, unquantified housing needs of neighbouring authorities within the South Hampshire region and therefore a requirement to quantify and identify more sites to meet that potential need, and the impact of the designation, under Site Allocation CTN1, of land at Parsonage Farm Catherington, for housing and the case for including their land adjacent to this site as an extension to this proposed housing site.

The letter is accompanied by a drawing, for clarification, showing the location in Catherington of my client's field.

Please get back to me if you require any further information or require clarification on any matter.

Regards,



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

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

02.03.2024

Dear Sir/Madam.

### **East Hampshire Draft Local Plan 2021-2040.**

I have been requested by my clients, [REDACTED] to make representation on their behalf to the East Hampshire Draft Local Plan 2021-2040, published as part of the Regulation 18 Stage Consultation Process under the Town and Country Planning (Local Planning (England) Regulations 2012).

As requested in the consultation process the specific sections of the Local Plan being responded to in this letter are highlighted.

#### **HOMES FOR ALL**

At a Strategic level my clients are very concerned that not enough provision has been made over the plan period for new dwellings, specifically to provide for the unmet need of neighbouring authorities within the South Hampshire region.

It is stated in the emerging Local Plan that, based on a Housing Background Paper - itself based on a Housing and Economic Needs Assessment published in 2022 and updated in September 2023 – that 9082 dwellings are needed.

The emerging Local Plan argues that a significant proportion (6225 dwellings) of this number have already been met by the granting of planning permission since 2021 and therefore there is a residual requirement of only 2857 dwellings.

This figure however does not include any specific numerical allocation for the unmet housing need of the neighbouring authorities, only a broad statement that the emerging Local Plan Housing Strategy proposes land is allocated for about (sic) 3500 dwellings within the Local Plan, with some provision made for this unmet need. No quantifying exercise has yet been undertaken to numerically identify this unmet need.

As the Partnership for South Hampshire 2003 Spatial Position Statement acknowledges that there is an unmet need across the whole sub region of approximately 12,000 dwellings to 2036. Having identified broad greenfield areas of search for Growth Assessment it states it

still leaves a significant need to locate development in greenfield areas outside the most constrained areas.

In paragraph 3.10 and 3.11 of the emerging Local Plan it is stated that in the short to medium term the Local Planning Authority should be able to meet the NPPF 2023 standard-method based housing needs and therefore for the purposes of the emergent Local Plan **no assumptions** have been made on the unmet needs of other neighbouring local planning authorities.

Paragraph 11b) of the National Planning Policy Framework however states that for plan making and strategic policies, these should provide for **objectively** assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

Until such an objective exercise has been undertaken it is considered that the proposed housing numbers proposed over the Local Plan period have not properly considered unmet needs and addressed and quantified them and therefore the draft Local Plan does not meet the sustainable development requirements of the NPPF and that of Paragraph 11b).

It is considered that once quantified, more sustainable housing sites will be needed to meet these needs over the plan period and that more than the stated 10% -15% additional and expanded sites should be identified and incorporated into the Plan to create a buffer. As the emerging Local Plan states it is important that any proposed allocations for development are flexible to assist with any potential issues around the delivery of sites.

### **CTN1 LAND AT PARSONAGE FARM, CATHERINGTON.**

To address housing needs based on up to 3500 dwellings over the Local Plan period the emerging Local Plan identifies housing sites, in what are considered to be the most sustainable locations for new development, based on a quantified hierarchy and tiered pattern of existing towns, villages and rural settlements.

The 20 minute concept of having some basic community facilities within a 10 minute walk or cycle ride as the crow flies (based) on a 1200 metre distance without the need to travel form part of the Accessibility Study.

Two housing sites have been identified in Catherington as suitable for residential development- CTN1 Land at Parsonage Farm, and CTN2 Land at the Diary.

In the summary of reasons for inclusion it is acknowledged that both are relatively well located for accessing some local facilities in Catherington by walking or cycling and both sites score above average in the Council's Accessibility Study.

My clients own the field to the immediate west of the Parsonage Farm site, shown on the accompanying plan. In 2009 they approached the Council through the SHLAA Call for Sites process to see whether it, together with what is now the proposed Land at Parsonage Farm site, was suitable for residential development. A subsequent 2011 Council desk top study and site survey concluded that collectively its development would represent a large-scale expansion beyond the existing settlement pattern of Catherington, which would be likely to

have an unacceptable impact on the character and appearance of the area. It was however acknowledged that what is now referred to as the Parsonage Farm site would appear to have some potential as an affordable housing exception site and assuming an identified local need, it would appear to meet the criteria of the then Local Plan Policy H12 on Affordable Housing Outside Settlement Policy Boundaries.

My client's site, despite also being offered for affordable housing, was deemed however to be very rural in character and extend development into open countryside.

Since this assessment and the proposed designation of Parsonage Farm site for development the rural nature and deemed open countryside nature of my client's site has dramatically changed and been completely lost.

It is now surrounded, on its eastern side, by the proposed Parsonage Farm housing development, the densely packed Lucky Life Caravan Storage Park on its southern side, the heavily trafficked Whitegate Farm Industrial Estate to the west and Viola to the north, a quasi-residential property used at varying times for the storage of fairground equipment and as a base for a motor repair business.

As such it can no longer be considered part of the open countryside or rural in character, being surrounded by existing and proposed residential development and extensive commercial businesses. Like both proposed housing sites, it is located outside of the Catherington Conservation Area.

It is therefore argued there is a very strong case for the allocation of my client's field for residential development, based on the fact that, like Parsonage Farm and the Dairy site, it is well located for accessing local facilities in Catherington, Horndean and Clanfield by walking or cycling and like both sites it scores above average in the Council's Accessibility Study.

Having been identified as potential housing sites in the emerging Local Plan, the Parsonage Farm site, together with land at the Dairy, have been included within the revised Settlement Policy Boundary for Catherington.

The very recent published January 2024 Settlement Policy Review paper acknowledges that settlement boundaries will include small scale development opportunities which will provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area. This infill and rounding off is directly applicable to my client's field as it will, with the identified proposed Parsonage Farm site, represent the consolidation of its physical, functional and visual relationship to this part of Catherington.

As such it is considered that there is a very strong case for inclusion of the field within the Settlement Boundary to Catherington, with development accessed either through the Parsonage Farm site or from Roads Hill.

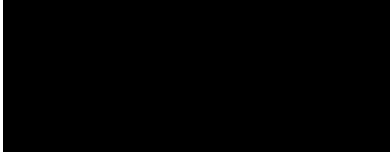
Its inclusion, especially as an affordable housing site, would separately also align with proposed Policy H4 on Rural Exception sites applied to sites outside of existing (or proposed) defined settlement boundaries, as it is on land adjoining or relates to villages.

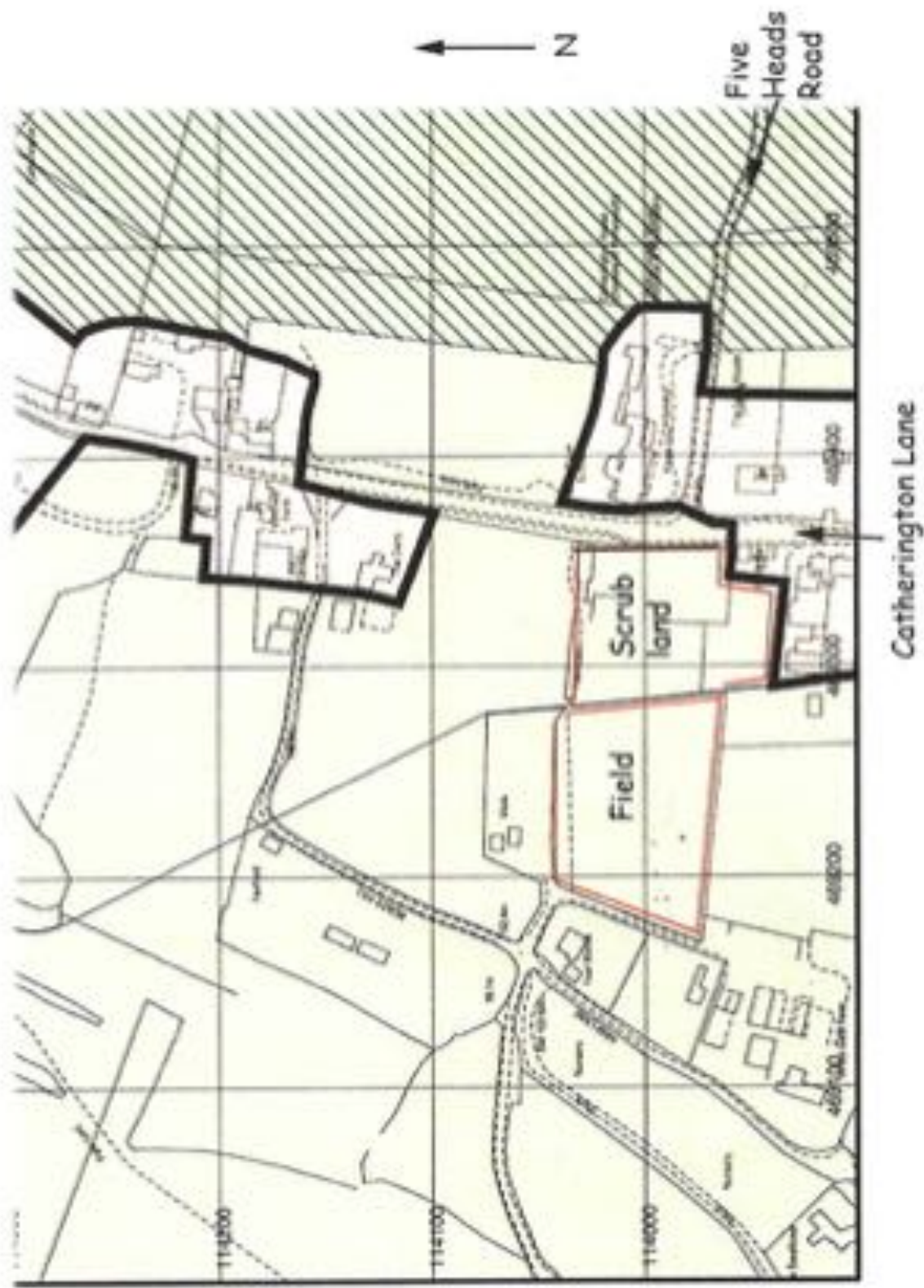


Please get back to me if you require any further information or require clarification on any matter.

I would be grateful for acknowledgment of receipt of this letter.

Yours faithfully,





# Written Representations.

## East Hampshire District Council Draft Local Plan 2021–2040 (Regulation 18 Stage 2 Consultation).

In support of residential development of Land  
south of Chalton Lane, Clanfield.

For and on behalf of Barratt David Wilson Homes.

March 2024.



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## 1.0 Introduction.

- 1.1 The following representations are made by Pegasus Group on behalf of our client, Barratt David Wilson Homes (BDW). They are made in response to the current consultation by East Hampshire District Council (EHDC) following publication of their Draft Regulation 18 Stage 2 Local Plan. We understand that this consultation is running for 6 weeks between **22<sup>nd</sup> January 2024 – 4<sup>th</sup> March 2024**.
- 1.2 BDW have an interest in Land south of Chalton Lane, Clanfield (“the site”). These representations and previous promotional work undertaken to date by BDW proactively set out the justification for allocating Land south of Chalton Lane as a sustainable and attractive site for residential-led development.
- 1.3 For the reasons set out in these representations, we are strongly of the view that the site should be allocated in the next iteration of the East Hampshire District Council DRAFT Local Plan 2021-2040.

Agent	Client
<p>██████████ ██████████ Pegasus Group 3 West Links Tollgate Chandlers Ford Hampshire SO53 3TG</p>	<p>Barratt David Wilson Homes Tollbar House Tollbar Way Hedge End Southampton SO30 2UH</p>



## 2.0 Draft Local Plan Housing Need

- 2.1 Objective A of the Draft Local Plan seeks the provision of 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. The Council commit to identifying and maintaining a supply of land to meet the requirements for market and affordable housing in East Hampshire, and ensure that the mix of housing is suitable, with an appropriate blend of house types, size and tenure, in the right locations.
- 2.2 Underpinning the delivery of new housing in East Hampshire, and indeed nationally, is the standard method for assessing local housing need. This sets out an objective formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.

### Standard Method Housing Need

- 2.3 The EHDC Reg 18 Local Plan produces a current calculation of its housing need based on the standard method, of **10,982 homes** required to be provided across the East Hampshire District (including the area in the South Downs National Park) between 2021–2040. The equates to **578 homes needing to be delivered per year between 2021–2040**.
- 2.4 However, the draft Plan then disaggregates this figure (as is allowed) between the two Local Authorities (East Hampshire DC and SDNPA) that collectively produce it.
- 2.5 This removes the housing need generated within the South Downs National Park area that also falls within the East Hampshire District. This lowers the resulting housing need figure in East Hampshire (outside of the National Park) to **8,816 during the plan period, or 464 homes per annum**. This leaves – in theory – 114 homes to be provided per year in the area of East Hampshire which is within SDNPA. However SDNPA will produce its own calculation of local housing need and allocate sites accordingly through its own Local Plan review.
- 2.6 Returning to the overall combined figure set out in the draft Local Plan, this number (of 578 homes per year) is inexplicably much lower than the standard method calculation established in the Council's own evidence base. EHDC instructed their own independent Housing and Employment Development Needs Assessment (HEDNA) prepared by Icen Projects in May 2022, to this end.
- 2.7 That HEDNA undertakes a thorough assessment of Overall Housing Need. The final conclusions are set out in full below, taken from page 55 of the assessment:

#### *'Overall Housing Need: Summary*

*In line with the standard method for calculating housing need as set out currently in the PPG, a **minimum local housing need of 632 homes per annum is identified for East Hampshire District.***

*This is derived based on household growth of 381 per annum, taking from the 2014–*



*based Household Projections and applying an affordability uplift of 66% applied to this based on the 2021 affordability ratio.*

*There are no circumstances in East Hampshire District relating to economic growth, growth funding, strategic infrastructure improvements, affordable housing need or unmet housing need which indicate that 'actual' housing need is higher than the standard method indicates.*

*Beyond the core considerations around local housing need across the District as a whole, **it is also acknowledged that a proportion of the Standard Method derived figure will be delivered in the area of the District falling within the South Downs National Park ("SDNP").***

*Iceni and JGC has considered household growth and affordability in each area to arrive at an appropriate split. This analysis has concluded that **delivering 115 homes per annum in the National Park area and the remaining 517 homes per annum in the LPA area [East Hampshire District Council] is an appropriate modelling assumption for the remainder of the report.** [Pegasus Group emphasis added].*

- 2.8 Overall then, the Regulation 18 Stage 2 Local Plan undershoots the objectively assessed housing needs figure in the Council's own evidence base by **53 dwellings a year** in the Local Plan. This accumulates to a shortfall of -1,007 homes during the 19 year plan period, which is a considerable and unexplained lowering of the Council's objectively assessed housing need against their own evidence base.
- 2.9 Across the entire area (including the SNDPA area within East Hampshire), there is a minimum need of 632 homes a year identified in the HEDNA, but just 578 homes a year being planned for in the Regulation 28 Stage 2 Draft Local Plan. This is a larger shortfall of 54 dwellings a year, or 1,026 dwellings across the plan period.
- 2.10 This is the starting point, but the matter is worsened by the fact that the draft Local Plan also ignores the conclusions of the HEDNA that delivering 115 homes per annum in the National Park area and the remaining 517 homes in the LPA area is an appropriate model to follow.
- 2.11 Instead of this, the current Draft LP plans for a scenario where 100 homes per annum will be provided in the National Park area, and 478 homes per annum in the LPA. There is no new or additional evidence presented in the draft Local Plan or its evidence base to explain why the Council have departed from the findings of the Assessment prepared by Iceni Projects in May 2022.
- 2.12 The discrepancies between the objectively assessed housing need calculated in the Council's own evidence base (HEDNA) and the draft Local Plan that the Council are now consulting upon are summarised in the following table:



<b>Housing Need Figures (inc. 14x homes for local unmet need – see below)</b>		
<b>Housing Need (dwellings per annum)</b>	HEDNA	Reg 18 Stage 2 Local Plan
a. Local Plan Area (dpa)	517	478
b. National Park Area (dpa)	115	100
c. Combined area (dpa) (a+b)	632	578
<b>During plan period 2021-2040</b>		
d. Total during plan period (LPA) (a x 19)	9,823	9,082
e. Total during plan period (combined) (b x 19)	12,008	10,982
<b>Housing Needs Shortfall (HEDNA vs Reg 18 Stage 2 Draft LP)</b>		
LPA shortfall during plan period	/	-741
Combined shortfall during plan period	/	-1,026

Table 1 – Housing Needs Shortfall (Reg 18 LP vs HEDNA)

2.13 In conclusion, the Council are proposing a minimum housing needs figure within their current draft Local Plan which is significantly below the housing need which has been independently identified by their own evidence base. No justification has been provided for this.

#### **Local unmet need**

2.14 Turning to an allowance for local unmet housing need in the draft LP, paragraph 3.9 of the Reg 18 Stage 2 draft explains how a ‘pragmatic approach’ has been taken in estimating the unmet housing need from the South Down National Park area. The assumption is made that 100 homes per year would typically be delivered within the part of East Hampshire that falls within the National Park, and therefore there would be a residual requirement (potential unmet need) of 14 homes per year (or 266 homes during the plan period).

2.15 Therefore 14 dwellings out of the 478dpa identified in the draft Local Plan are identified to be meeting the unmet needs of the National Park.

2.16 As discussed above, as a starting point this ‘100 homes’ figure is disputed because it is 15 dwellings below the annual unmet need that the HEDNA suggested:

*‘This analysis has concluded that **delivering 115 homes per annum in the National Park area and the remaining 517 homes per annum in the LPA area** [East Hampshire District Council] is an appropriate modelling assumption for the remainder of the report’. [Pegasus emphasis added]*

2.17 Furthermore, objection is raised in regards to how this unmet needs figure of 14 dwellings has been reached. The draft LP suggests that the approach has been based on ‘past delivery and historic agreements with the SDNPA.’

2.18 Past delivery, however, is historic and does not look to the future housing needs of East Hampshire, the South Downs or the South-Hampshire sub-region more widely (which is discussed in more detail below).

2.19 Applying an unjustified (and unevidenced) baseline calculation of 100 dwellings





delivered in a highly sensitive and constrained area to equating that to the delivery of unmet need in the wider East Hampshire District is neither a robust nor a justified approach to cross-boundary cooperation. There is no evidence presented as to how this figure has been reached and it is a reductive approach to housing delivery and addressing affordability, in particular.

### **Partnership for South Hampshire (PFSH)**

2.20 Para 3.10 of the draft Local Plan then touches upon an identified and well-reported unmet need across the sub-region of South Hampshire (which East Hampshire lies within) of approximately 12,000 homes to 2036.

2.21 The Partnership for South Hampshire (PFSH) comprises a collaboration of Local Planning Authorities in the region, working together to facilitate strategic planning functions necessary to support growth. The Councils forming the partnership include:

- Eastleigh Borough Council;
- **East Hampshire District Council (part);**
- Fareham Borough Council;
- Gosport Borough Council;
- Hampshire County Council (part);
- Havant Borough Council;
- New Forest District Council;
- New Forest National Park (part);
- Portsmouth City Council;
- Southampton City Council;
- Test Valley Borough Council (part); and
- Winchester City Council (part).

2.22 In December 2023, the PFSH published an updated Spatial Position Statement setting out the overall need for, and distribution of, development in South Hampshire. This Position Statement was produced collaboratively between the constituent authorities (listed above) that make up the PFSH.

2.23 Whilst the Position Statement is not an upper-tier plan, it does provide informal guidance to inform the preparation and strategic coordination of local plans in the Sub-Region. Given their membership of PFSH, EHDC contributed to and approved the findings and conclusions of the Position Statement. Some of its relevant findings and recommendations are set out below.

#### *Part of East Hampshire DC within the sub-region*

2.24 The southern part of East Hampshire District lies within the PFSH boundary. Importantly, the settlements of Clanfield, Catherington and Horndean all lie within the boundary and therefore contribute to the sub-region both in terms of housing residents in the region and contributing to the economic growth of the area.

#### *Housing Need in South Hampshire*

2.25 The December 2023 Position Statement discusses housing need and supply. The



Statement identifies that there is a major need to provide new homes for a growing and aging population and for an increasing number of households. Table 1 of the Statement provides an estimate of all of the PfSH authorities' housing needs, extracted below:

**Table 1: Comparison of housing need and supply 2023 – 36**

Local Authority	Annual Housing Need using Standard Method (dpa)	Total housing need 2023 – 2036	Identified Supply = Commitments, local plan allocations + windfall estimate	Shortfall/ surplus
East Hants (part)	113	1,469	1,275	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	+900 <sup>10</sup>
Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	899	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0 <sup>11</sup>
Test Valley (part)	182	2,366	3,109	+743
Winchester (part)	235	3,055	3,055 <sup>12</sup>	0
<b>Total</b>	<b>6,037</b>	<b>78,481</b>	<b>64,909</b>	<b>-11,771<sup>13</sup></b>

Table 2 – extracted from PfSH Spatial Position Statement

2.26 As illustrated in Table 2, the total shortfall across the sub-region is clearly significant.

2.27 The Position Statement advocates a 2-stage approach to addressing the needs of those authorities that are currently unable to meet their needs (para 6.33-6.34):

*'Stage one: in the short to medium term the following authorities should be able to meet and potentially exceed NPPF 2023 standard method-based housing needs in their respective local plan areas:*

- East Hampshire
- Eastleigh
- Fareham
- Test Valley
- Winchester.



*Stage two: in the longer term, the Broad Areas of Search for Growth, identified in SPS8 below, will be considered in local plans, including the contribution they can make to ongoing unmet housing need in the sub-region.'*

2.28 Whilst it is contested by the evidence presented above in relation to EDHC's objectively assessed housing needs, the current draft Local Plan sets out how the Council believe that they essentially meet the very basic requirements of 'Stage 1' of the two-stage approach that PfSH endorses.

*Unmet need in the sub-region*

2.29 However, 'Stage 1' is not just a PfSH recommendation, it is national policy set out in the NPPF at paragraph 67. A Council failing to set out suitable policies to meet its identified housing need across a plan period, without exceptional circumstances, would render a plan unsound. The LPA simply meeting its established housing need is the bare minimum that a Local Plan should achieve in delivering a sufficient supply of new homes.

2.30 Moreover, 'Stage 1' of the PfSH approach to meeting housing needs suggests that the above authorities should be able to '*meet and potentially exceed*' NPPF 2023 standard method-based housing needs. The EHDC draft Local Plan does not do this, and it does not set out any reason why it has not done so.

2.31 Indeed, the draft Local Plan states in paragraph 3.5 that:

*'It is acknowledged that in the short to medium term that the Local Planning Authority [EHDC] **should** be able to meet NPPF 2023 standard-method based housing needs.'* [Pegasus Group emphasis added]

and:

*'The Spatial Position Statement acknowledges that in the longer term, Broad Areas of Search for Growth will need to be considered in local plans, including the contribution they can make to ongoing unmet housing need in the sub-region. **None of these Areas of Search are identified in the Local Plan Area.**'* [Pegasus Group emphasis added]

2.32 The Council have taken the position that because none of the Broad Areas of Search for growth to respond to the unmet needs of the sub-region fall within East Hampshire's Local Authority area, they should make no contribution to the unmet need of its neighbouring and nearby authorities.

2.33 The Broad Areas of Search for sustainable strategic scale development are set out in SPS8 of the Position Statement. Collectively, they could deliver a combined total of 9,700 homes:

- South-east/east of Eastleigh Town (Eastleigh)
- Havant Town Centre (Havant)
- Waterlooville Town Centre (Havant)
- Southleigh (Havant)



- East of Romsey (Test Valley)
- South-west of Chandler's Ford (Test Valley)
- East of Botley (Winchester)

2.34 Three of these seven Broad Areas of Search are in Havant borough, immediately south of East Hampshire. However, two of those three – the Havant and Waterloo Town Centres areas of search – have considerable constraints. They involve the regeneration of extensive areas of brownfield land and this presents risks in terms of increased development costs, susceptibility to contamination, fragmented ownership and other barriers to delivery. The combined effect of these additional complexities is likely to extend the timeframe for the delivery of these strategic regeneration schemes beyond the plan period.

2.35 Moreover, the Broad Areas of Search have the combined potential to deliver around 9,700 dwellings, against a shortfall of 12,000 dwellings, leaving a balance of 2,300 dwellings which is not addressed by PfSH.

2.36 As a result, in addition to the sub-regional strategic scale growth areas, there remains an important role for emerging Local Plans to allocate sufficient land to ensure the delivery of the Standard Methodology housing requirement as a minimum, and to also contribute to addressing the 2,300 dwelling gap in the very substantial housing delivery shortfall in the South Hampshire sub-region. The draft Regulation 18 Local Plan is deficient in both of these respects.

### **Summary**

2.37 East Hampshire District should be capable of both meeting and exceeding its own Standard Method housing needs, and it should be making a meaningful contribution to addressing the very substantial housing shortfall in South Hampshire. Given that none of the 'Broad Areas for Search' identified by PfSH to respond to this unmet need are in the EHDC Local Plan area, the Council have chosen to not provide any contribution in the draft Local Plan towards the identified 12,000-home identified unmet need in South Hampshire. This is despite the fact that emerging Local Plans will need to collectively allocate land for 2,300 dwellings, being the balance in the 12,000 dwelling shortfall which is not addressed by the Broad Areas of Search for growth. This is despite the Council being a member of the Partnership for South Hampshire, and having settlements within the sub-region.



## 3.0 The Site and Delivery Benefits

### The site

- 3.1 As set out in promotional material to date, the site comprises approximately 11ha of land to the south of Chalton Lane and is currently defined on the Proposals Map to the Joint Core Strategy for East Hampshire (Part 1 Local Plan) (2014) and the Housing and Employment Allocations DPD (Part 2 Local Plan) (2016) as being located within the countryside, within a local gap, outside of the defined settlement boundary for Clanfield.
- 3.2 The site is not subject to any national and/or local landscape designations. However, the National Park boundary does extend up to Chalton Lane to the north of the site and the site is also identified in the adopted development plan as being within a “local gap”. However, local gap designations will necessarily be reviewed as part of the Local Plan process.
- 3.3 As touched upon previously, the site has been assessed in the Council’s Land Availability Assessment (“LAA”) (Sept 2021) as a developable site for circa 164 dwellings (Site Ref: LAA/CL-001). The LAA forms part of the evidence base to the emerging Local Plan Review. The Council’s positive assessment of the merits of the Site as a developable opportunity are helpful in terms of its future promotion through the Local Plan process.

### Settlement Hierarchy

- 3.4 Clanfield is currently identified as a ‘Small Local Service Centre’ in the third tier of the settlement hierarchy in the adopted EHDC Joint Core Strategy (June 2013). This is just below the main towns and large local service centres of Alton, Whitehill & Bordon, Liphook and Horndean.
- 3.5 As set out in the Council’s Settlement Hierarchy Background Paper (Dec 2018) and more recently in the Regulation 18 Stage 2 DRAFT LP, Clanfield is identified as the 8th most sustainable settlement in the District and is proposed to be classified as a ‘Teir 3 Settlement’. The DRAFT Local Plan states (para 3.38) that:

*‘Tier 3 settlements across the Local Plan Area often provide a focal point for the surrounding villages and rural areas in terms of the provision of local services and facilities. Although they do not have as wide a range of services as the higher order settlements (Tiers 1 & 2), they are still sustainable locations.’*

- 3.6 It is therefore considered that Clanfield is a sustainable location for housing growth and new development in Clanfield could bring with it a number of important benefits for new and existing residents.

### Delivery Benefits

- 3.7 In promoting the subject site, Barratt David Wilson have been keen to engage with Clanfield Parish Council to understand their views on potential appropriate locations



for new homes in Clanfield, as well as any local issues or concerns which might be alleviated or addressed by new development or developer contributions.

#### *Accessibility & Active Travel*

- 3.8 Specific consideration has been given to comments raised relating to the impact of reported queueing along Chalton Lane during the local primary school AM/PM peak periods. Discussions have also been had regarding the accessibility / sustainability of active travel modes in the villages, and opportunities to improve walking and cycling connectivity between key facilities and residential areas.
- 3.9 A Transport Note has been prepared by Paul Basham Associates (PBA, transport planning consultants), which is submitted as a supplementary report to these representations.
- 3.10 The findings of that Transport Note are summarised below:
- The queueing assessment found that queues were observed, but limited and short in their nature. They did not extend to the site or the proposed site access.
  - Short queues were occasionally caused by the traffic calming feature on Chalton Lane, however this is to be expected (i.e. the traffic calming feature was fulfilling the purpose for which it was installed).
  - Improvements to walking and cycling connections in the village, identified in the *Clanfield, Waterlooville Pedestrian and cycling accessibility Improvements in Clanfield Feasibility Report (March 2017)* have in some instances not been implemented. This is something that the potential development of Land south of Chalton Lane could assist with funding and delivering.
  - The report also identifies improvements to the surfacing of walking routes between South Lane and Sunderton Lane meadows to the south of the site.
  - Existing conditions at the meadows were observed to have segregated pedestrian/vehicular accesses but no formal bound surface through the meadows. Again, surfacing of this route is something which the development could help deliver or fund.
- 3.11 BDW would be keen to continue dialogue with the Council and Parish Council about possible improvements in this regard.

#### *Other benefits*

- 3.12 BDW have also discussed, with Clanfield Parish Council, other community benefits or local infrastructure that could be delivered alongside new development at Land south of Chalton Lane.
- 3.13 It is understood that Clanfield Cricket Club is seeking a new clubhouse / pavilion at its South Lane ground, and that Clanfield FC is seeking an additional football pitch. The delivery of new development on Land south of Chalton Lane could contribute to such community needs via contributions made through Section 106 Agreements.



## 4.0 Current draft allocations in Clanfield

4.1 Two sites have been selected as draft housing allocations in the current draft version of the Local Plan. These are:

- Clanfield County Farm – 4.5ha, 100 dwellings; and
- Land at Drift Road – 6.0ha, 80 dwellings.

4.2 This section discusses the merits of those sites for inclusion as DRAFT allocations.

### **Clanfield County Farm (Draft Policy CFD1)**

4.3 This site comprises a sustainable location for new homes with access to local services and facilities. The site is well-enclosed with existing development on its southern, eastern and western boundaries. The cricket ground lies to the north of the site.

4.4 The Clanfield County Farm site also proposes a single point of access of South Lane.

#### *Flood risk*

4.5 The only concern with the site would be the susceptibility of its access to surface water flooding, which the draft allocation policy (CFD1) identifies.

4.6 Under the current Planning Practice Guidance (which was significantly strengthened in August 2022) the LPA will be obliged to subject allocated sites to a Sequential Test for Flood Risk, where safe access/egress cannot be achieved due to a flood risk from any source (not just fluvial / sea flood risks).

4.7 Clanfield County Farm draft allocation has surface water flooding across the entire frontage and there are no other access options into the site. For this reason the LPA need to assess and discount other sites that have a lower susceptibility to surface or other forms of flood risk, through the sequential testing exercise.

4.8 We would posit that the Chalton Lane site has no surface water flooding across frontage, nor the rest of site and is entirely within Flood Zone 1. Our client's site is sequentially preferable.

### **Land at Drift Road (Draft Policy CFD2)**

4.9 Land at Drift Road is included in the Reg 18 Stage 2 LP as a draft housing allocation for 80 dwellings. Concern is raised with this draft allocation.

#### *Landscape Impact*

4.10 From a landscape perspective, the site is entirely exposed on its southern and western boundaries, with no defining features such as hedgerows or existing development to provide a sense of enclosure or definitive boundary to the site. It also bears no resemblance to the existing pattern of built-development in the village, wrapping around existing development at Godwin Crescent which itself already projects

southward and westward from Drift Road and White Dirt Lane, albeit now enclosed by mature boundary vegetation.

4.11 In addition, the site is extremely exposed by virtue of its topography. The site rises steeply from its lowest point on White Dirt Lane, to much higher levels in the west and north-west.

4.12 Draft Policy CFD2 acknowledges this:

*'there is potential for adverse landscape and visual impacts due to reductions in the open, rural setting of adjacent urban areas. The prominence of land increases from east to west, as the land rises towards a ridge line that lies to the west of the site boundary.'*

4.13 The allocation overall will represent a jarring westward and southward projection from existing development at Godwin Crescent in a highly visible location with a challenging and exposed topography.

#### *White Dirt Lane – refused application*

4.14 The landscape issues identified above are supported by the decision reached by East Hampshire District Council on a planning application for up to 135 dwellings on land south of White Dirt Lane in 2014. This application site lies immediately south of the now draft allocated site for residential development in the Regulation 18 Stage 2 LP, at Drift Road.

4.15 The residential scheme proposed in the White Dirt Lane planning application set out an illustrative layout for residential development extending from the northern-most property on the west side of Southdown Road, to the junction of White Dirt Lane and Southdown Road. The site location plan for the refused planning application, and its relationship to the proposed residential allocation at Drift Road, is set out below:







4.16 Reason for refusal 1 of that planning application stated the following:

*'The development of this site would have a **significant harmful impact on the landscape character and appearance of the area, and have a strong harmful urbanising effect on the established landscape setting**. The development would undermine the physical and visual separation of settlements and compromise the integrity of an important strategic local gap. The application is therefore contrary to Core Strategy Policies CP20, and CP23, as well as paragraphs 17 and 61 of the NPPF'. [Pegasus emphasis added]*

4.17 The two sites share a boundary with White Dirt Lane and a number of related landscape features which are discussed by the Planning Officer in reaching their decision on the above planning application.

4.18 On the matter of landscape specifically, the Case Officer found that:

*'It is an open site, highly visible from the surrounding housing and fields, and development would have a detrimental effect on the local landscape character. I disagree with the LVIA which finds the effects on landscape character to be of negligible to low magnitude of change with neutral to slight adverse effect. The statement that 'the proposals can be accommodated without significant impacts on the character of the wider landscape or the adjoining urban area' is not correct.'*

4.19 Similar conclusions could reasonably be expected for the site which EHDC now intend to allocate for 80 dwellings at Drift Road.

4.20 The site proposed at Drift Road is not contained by any physical features on its western and southern boundaries. It comprises a very open, highly visible site when viewed from the surrounding viewpoints (along Drift Road and Southdown Road, predominantly), and its development would be likely to cause detrimental impacts on the local landscape character.

#### *Flood risk*

4.21 Likewise Clanfield County Farm, this draft allocation has surface water flooding along the entire frontage, at both White Dirt Lane and Drift Road.

4.22 As noted earlier under the current Planning Practice Guidance (which was significantly strengthened in August 2022) the LPA will be obliged to subject sites to a Sequential Test for Flood Risk, where safe access/egress cannot be achieved due to a flood risk from any source.

4.23 The LPA therefore need to apply a sequential test to Drift Road draft allocation.

4.24 We would posit that the Chalton Lane site has no surface water flooding across frontage, nor the rest of site and is entirely within Flood Zone 1. Our client's site is not inhibited by any constraints to its delivery, and is therefore sequentially preferable.



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*Summary*

- 4.25 For the reasons stated above, these representations find that draft allocation CFD2 (Drift Road) will have a harmful impact on the landscape character of Clanfield,.
- 4.26 Notwithstanding the location of this site in close proximity to the village local centre to the east, the harm arising from the landscape impact of its development would be significant enough to outweigh this.
- 4.27 Finally, the site suffers from flooding issues at both of its proposed access points. A sequential test will need to be undertaken. Land south of Chalton Lane is sequentially preferable against the test.



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## 5.0 Summary and Conclusions

- 5.1 These representations to the EHDC Regulation 18 Stage 2 Local Plan consultation are made on behalf of Barrat David Wilson Homes. They should be read in conjunction with the Vision Statement submitted to the Council in January 2023, which responded to the Regulation 18 Stage 1 consultation. A supplementary Transport Note prepared by Paul Basham Associates is also submitted as an appendix to these representations.
- 5.2 Objections are raised to the draft Regulation 18 Stage 2 Local Plan for the following reasons:
- 5.3 The draft Local Plan is not planning to meet its minimum housing requirement calculated in accordance with the Standard Method. Instead, the Plan is proposing to deliver a shortfall of 741 dwellings against the Council's minimum requirement. Additional land should be allocated for 750 additional dwellings to at least accommodate this shortfall.
- 5.4 The draft Local Plan is not making a contribution towards addressing the very substantial unmet housing need identified in south Hampshire in the recent Partnership for South Hampshire Position Statement (December 2023).
- 5.5 A shortfall of 12,000 dwellings is identified, of which 9,700 dwellings may be allocated in Local Plans in Broad Areas of Search for growth proposed by PfSH. This still leaves a balance of 2,300 dwellings to be allocated on smaller sites in Local Plans.
- 5.6 In addition to the need to allocate additional land to meet its own housing shortfall, the Plan should allocate land to assist in addressing the housing shortfall in the wider south Hampshire sub-region. In the eastern part of the sub-region, Portsmouth and Gosport are particularly constrained, and Havant district is already the location for three Broad Areas for Growth. Therefore, the 2,300 dwelling shortfall should be accommodated between Fareham and East Hampshire Districts, with a suggested split of 575 dwellings in East Hampshire and 1,725 dwellings in Fareham (split 25% / 75% given their relative land areas within the sub-region).
- 5.7 Accordingly, additional sites should be allocated in the Local Plan to deliver an additional 1,325 dwellings (750 + 575), with 575 dwellings being in the South Hampshire sub-region part of the District.
- 5.8 In relation to Clanfield, concern is raised specifically regarding the draft allocation of site 'Policy CFD2', Drift Road, for 80 dwellings, given the landscape harm that will result. It is submitted that this draft allocation should be deleted.
- 5.9 Both of the draft allocated sites in Clanfield (CFD1 and CFD2) also raise concerns in relation to flood risk. The Council will be required to undertake a sequential test for these sites. Land south of Chalton Road is sequentially preferable in flood risk terms.
- 5.10 Regardless of whether the Drift Road site is deleted, Land south of Chalton Lane is a sustainably located site, within an area of low landscape sensitivity. There are no overriding technical constraints to development of this site and its future delivery



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presents the opportunity to deliver significant benefits for existing and new residents in the village in the form of sports and recreational facilities and accessibility improvements.

- 5.11 The site can deliver up to 200 new homes as a significant contribution to the supply of housing both in East Hampshire district and in the South Hampshire sub-region where there is an acute shortfall in housing delivery.
- 5.12 We therefore recommend that Land south of Chalton Lane should be allocated for up to 200 dwellings in the Council's Regulation 19 Local Plan.



# CHALTON LANE, CLANFIELD

## TRANSPORT NOTE

February 2024

Barratt David Wilson Homes

RESIDENTIAL DEVELOPMENT  
CHALTON LANE  
CLANFIELD

TRANSPORT NOTE

CONTROLLED DOCUMENT

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TRANSPORT NOTE

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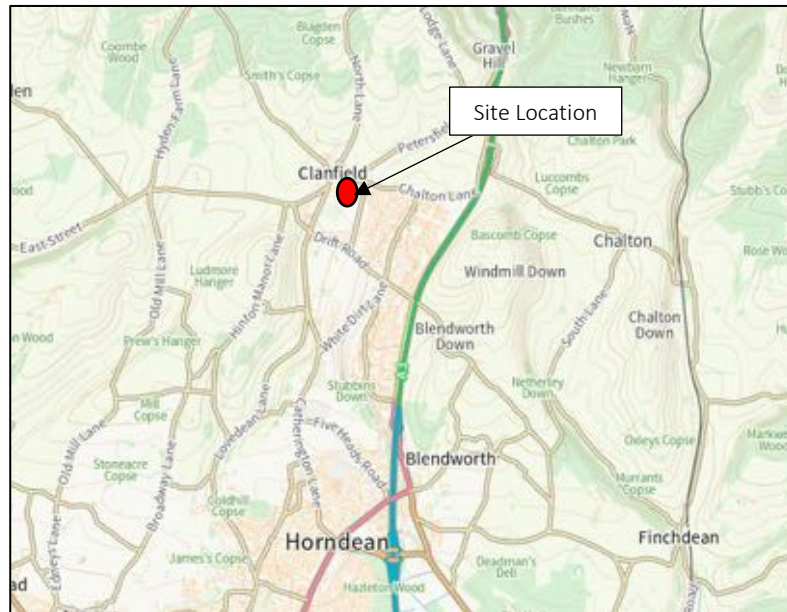
- Table 1 – Proposed Improvements in Site Vicinity

**Appendices**

- Appendix A – AM Survey Photos
- Appendix B – PM Survey Photos

## 1. INTRODUCTION

- 1.1 This Transport Note (TN) has been prepared by Paul Basham Associates on behalf of Barratt Homes to support promotion of a residential development of approximately 200 homes. The site location is shown in **Figure 1**.



**Figure 1:** Site Location

- 1.2 The proposed development site is identified in the East Hampshire District Council's (EHDC) Local Plan: Land Availability Assessment and identified as site reference: LAA/CL-001. The site has been identified as developable for a capacity of 164 residential units with a 0-5 year timescale.
- 1.3 This report has been written with consideration to the NPPF (specifically paragraph 115) and EHDC guidance.
- 1.4 This report has been prepared to consider comments made by members of Clanfield Parish Council (PC), following discussions between the Council and our client in 2023. Specifically, the comments raised relate to the impact of queueing on Chalton Lane during the local primary school peak periods and a review of the accessibility/sustainability of schemes within Clanfield. The remainder of this report will therefore assess these items in turn.



## 2. QUEUING ASSESSMENT

- 2.1 As aforementioned, the PC raised concerns that during the school peak hours (specifically the AM) traffic travelling north-west along Chalton Lane towards Clanfield Junior School causes queuing back past the proposed location of the site access.
- 2.2 To consider the comments made, a site visit was undertaken on Wednesday 7<sup>th</sup> February 2024. To ensure that the school peak periods were fully observed, the site visit was undertaken, and queue lengths were assessed between 08:15 – 09:00 and 14:50 – 15:40 in accordance with school opening hours. The site visit included an assessment of the queuing in the locale, with specific consideration to the impact of queuing in the vicinity of the proposed development access along Chalton Lane.
- 2.3 On the day of the site visit, the weather was cold (but relatively dry), and given the survey was undertaken on a neutral weekday, both the weather and time of the survey reflect fairly average conditions that would be anticipated to occur regularly.
- 2.4 Whilst at the time of the survey there were temporary traffic lights relating to modest gas works at the junction of South Lane at Hambledon Road (22<sup>nd</sup> January-16<sup>th</sup> February), these temporary traffic lights would only serve to make any recorded queuing worse than the normal conditions.

### AM Survey Period

- 2.5 During the AM school peak period, traffic queueing was observed from both the Nickleby Road junction (circa 180m west of the potential site access) and with a view of the queueing that was occurring at the traffic calming feature (close to the potential access location). The location of these features are shown in **Figure 2**.



Figure 2: Location of Features

2.6 In the AM peak, queuing was observed to be relatively minimal with queues rarely passing the junction at Pond Lane or Nickleby Road as seen in **Photographs 1 - 4**. Full photographic data for the AM survey is provided in **Appendix A**, recorded in 5 minute increments.



Photograph 1: Queuing along Chalton Lane at 08:30am



Photograph 2: Queuing along Chalton Lane at 08:40am



**Photograph 3:** Queuing along Chalton Lane at 08:50am



**Photograph 4:** Queuing along Chalton Lane at 09:00am

2.7 Given that the queues never extended back past Nickleby Road, whilst queues were observed at the traffic calming feature (a maximum of 7 cars), this could not be attributed to the queueing for the school, but rather the operation of the traffic calming feature itself. When queues did form, they were quick to dissipate as soon as there was a break in the traffic travelling eastbound. This is visually demonstrated in **Photographs 5 and 6**.



**Photograph 5:** Observed Traffic Travelling North-westbound (0830)



**Photograph 6:** Observed Traffic Travelling North-westbound (0900)

2.8 As seen in the photos set out (**Photographs 1-6**), whilst queueing did occur, this did not extend back past the Nickleby Road junction and cleared within a few minutes.

2.9 Despite the temporary traffic lights along South Lane as aforementioned, the queueing observed and evidenced does not identify any concerns with the proposed access location and the suitability of residents accessing/egressing the proposed development during the school AM peak period.

#### **PM Survey Period**

2.10 The school PM peak showed similar results with queues rarely exceeding the Pond Lane junction and reaching the Nickleby Road Junction only once (observed at 15:20). This is demonstrated in Photographs 7 – 10. Full photographic data for the PM survey is provided in **Appendix B**.



**Photograph 7:** Queuing along Chalton Lane at 15:15pm



**Photograph 8:** Queuing along Chalton Lane at 15:20pm



**Photograph 9:** Queuing along Chalton Lane at 15:25pm



**Photograph 10:** Queuing along Chalton Lane at 15:30pm

- 2.11 Similarly to the AM survey, and as demonstrated in the photographs above, queues were quick to clear and didn't last for longer than 5 minutes.
- 2.12 During the PM peak, queues were also assessed at the traffic calming along Chalton Lane which abuts to the proposed development. Whilst queues did inevitably form at this location, as with the AM survey, they were only ever as a result of the traffic calming and an oncoming vehicle. When a queue had formed however, it cleared quickly as eastbound traffic was infrequent and there was no queueing in front of the traffic calming that would have restricted them doing so. Queues at the traffic calming and their extent can be seen in **Photographs 11 – 14**.



**Photograph 11:** Queuing at Chalton Lane traffic calming at 15:15



**Photograph 12:** Queuing at Chalton Lane traffic calming at 15:25



**Photograph 13:** Traffic Flowing in front of Traffic Calming 15:40



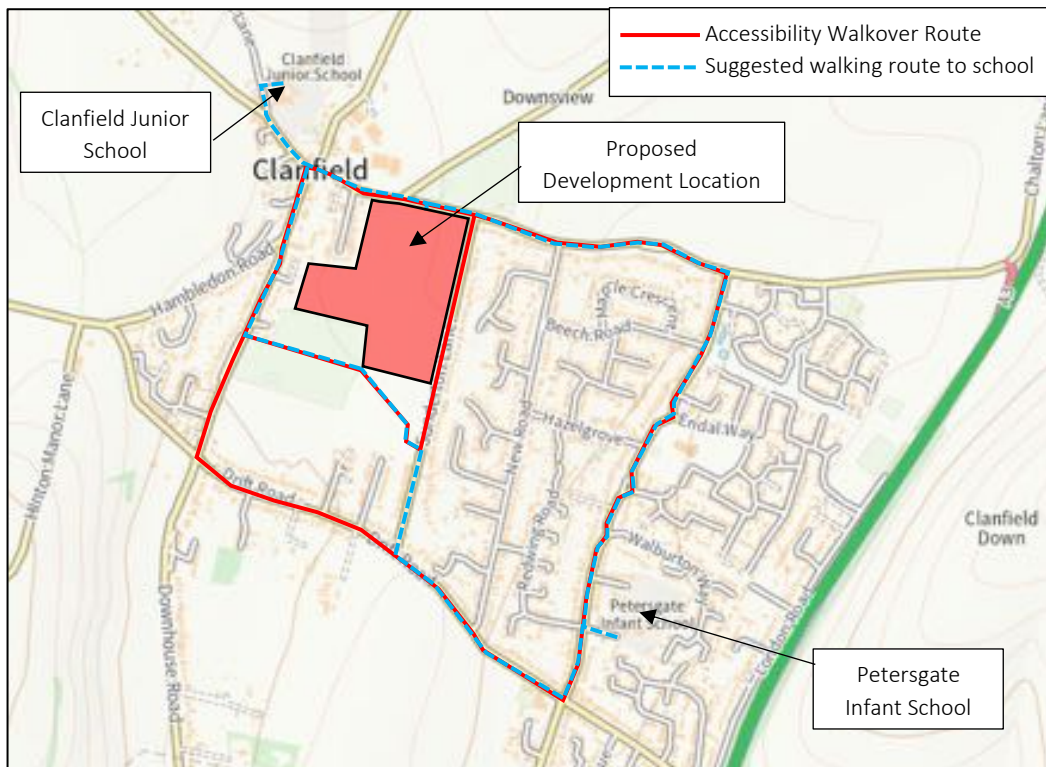
**Photograph 14:** Traffic Behind Traffic Calming 15:40

2.13 In summary, modest queues were present along Chalton Lane both at the traffic calming near the proposed development access and at the junction to East Meon Road (which leads to the school). However, the queuing at the traffic calming feature was only as a result of the traffic calming feature (i.e. a deliberate obstruction to free-flowing traffic to reduce speed) and at neither location did the queue last for longer than a couple of minutes. There was no cumulative queuing related to school traffic along Chalton Lane extending to the development site.

2.14 Furthermore, the potential development site is located within walking distance of Clanfield Junior School, such that pupils from these new dwellings would not need to drive to drop-off/collect pupils of the school.

### 3. ACCESSIBILITY REVIEW

- 3.1 Comments were also made by the PC with regard to the existing facilities and amenities in Clanfield and how developments can help to improve the situation to encourage travel by non-car modes. Therefore, a review of the Havant Borough Council (HBC) ‘*Clanfield, Waterlooville Pedestrian and cycling accessibility Improvements in Clanfield Feasibility Report*’ (March 2017) has been undertaken, as well as consideration given to both the HBC and the *EHDC Local Cycling, Walking Infrastructure Plan* to identify any improvements that could be implemented/delivered through the proposed development.
- 3.2 During the site visit on Wednesday 7<sup>th</sup> February, an accessibility review was also undertaken. The walkover route is demonstrated in **Figure 3** along with potential walking routes to the local infant and junior schools.



**Figure 3:** Accessibility Review Walkover Route

- 3.3 As seen in **Figure 3**, the route to Clanfield Junior School would be via Chalton Lane and East Meon Road. For the route to the Infant School, several routes could be taken. The Accessibility Walkover route considered the use of Drift Road and Green Lane (as well as Chalton Lane), given that these are primary roads in the area. Each road has sufficient pedestrian infrastructure, thus being suitable options.





J2	Chalton Rd Peel Park	No bus shelter	1	Provide new shelter with perch sheet	B	No shelter at bus stop
J5	Chalton Rd opposite Peel Park	No bus shelter	1	Provide new shelter with perch sheet	B	No bus shelter
J6	From Sunderton Lane on Chalton Road towards village	Potential to widen footway	2	Widen footway into verge	B	
J7	Chalton Rd leading to park	No formal crossing	1	Introduce flush kerbs with tactiles	A, C, D	Flush kerbs with tactile paving present although no footway/path lining pedestrian crossing to nearby access
J8	Entrance to Park (Chalton)	Restricted access	1	Ramp/access	A, B, D	Access remains stepped with no ramp
J9	Chalton Lane junction Nickelby Rd	No formal crossing	1	Introduce flush kerbs with tactiles	A, C, D	Dropped kerbs present but no tactile paving
J10	Nickelby Rd pond	Broken gate	3	Replace/fix	F	

**Table 1:** Proposed Improvements in Site Vicinity

3.7 **Table 1** demonstrates that there are a couple of improvements that could be implemented/contributed towards by the proposed development to help improve the accessibility to services in the immediate vicinity. The improvements referenced in **Table 1** as J1, J7 and J8 are visually demonstrated in **Photographs 15 – 18** as improvements that could be funded/delivered by the proposed development.



**Photograph 15:** Existing conditions at Peel Park



**Photograph 16:** Existing conditions at Peel Park



**Photograph 17:** Existing conditions at Peel Park



**Photograph 18:** Existing conditions at Peel Park

## Meadows

- 3.8 It should also be noted that Part A of Book 2 of the FR considers potential improved pedestrian access through South Lane and Sunderton Lane Meadow. This includes a 3m wide all weather-surface through South Lane and Sunderton Lane Meadows to provide a shared use link from South Lane to Sunderton Lane. The proposal would also include a new pedestrian access on to South Lane away from the vehicular car park access.

3.9 It was observed on site that segregated access points for pedestrians/cyclists and vehicles have been implemented on South Lane, and a gated access on to Sunderton Lane. The surface of the route through the meadows, however, does not appear to be bound, with a more informal surfacing observed. The access points and surfacing through the meadows are shown in **Photographs 19 – 20**.



**Photograph 19:** Existing conditions at Sunderton Lane footway access



**Photograph 20:** Existing conditions of Sunderton Lane Meadow footway



**Photograph 21:** Existing conditions at South Lane footway access



**Photograph 22:** Existing conditions of South Lane Meadow footway

- 3.10 Given that the potential development site sits just north of the meadows, it may be beneficial for Barratt David Wilson to support these proposals by contributing towards the upgrading of the surfacing to better accommodate movements in all-weather conditions. However, it would be useful to obtain Parish and Borough Council thoughts as to whether the informal mowed paths in the meadows is sufficient to address the pedestrian and cycle proposals within the FR.
- 3.11 HBC's LCWIP details plans for further cycling infrastructure to increase connectivity in Clanfield, with an unsignposted route connecting Downhouse Road, South Lane, Chalton Lane, Drift Road and Green Lane.
- 3.12 In addition, EHDC's LCWIP V1.2 (August 2020) has also been considered with regards to further walking or cycling measures that could be supported by the proposed development. The LCWIP states to consider a surfaced connection across the Sunderton Lane/South Lane playing fields, which have already been considered further within this report. No further specific improvements are identified within the LCWIP that the proposed development could provide.

#### **Sunderton Lane**

- 3.13 The *Clanfield, Waterlooville Pedestrian and cycling accessibility Improvements in Clanfield Feasibility Report'* identifies minor improvements to Sunderton Lane at the junction with Chalton Lane to the north and with Drift Road to the south. Whilst there are no further improvements within the LCWIP or FR along the Sunderton Lane carriageway that would be beneficial for the proposed development to support, there may be an opportunity to improve the formal pedestrian network for residents on Sunderton Lane. This could be by providing a footway within the proposed sites' boundary flanking the western side of Sunderton Lane, which could tie into the existing infrastructure along Chalton Lane.
- 3.14 Due to the existing width of the Sunderton Lane carriageway to the south of the proposed site, the footway would likely only be provided within the sites' red line, however this would reduce the amount of time pedestrians spend walking in the carriageway if they are travelling northbound on Sunderton Lane.

#### 4. SUMMARY AND CONCLUSIONS

- 4.1 This Transport Note has been prepared by Paul Basham Associates on behalf of Barratt David Wilson Homes to support the promotion of their site at Chalton Lane for a residential development comprising of approximately 200 homes.
- 4.2 The aim of the report is to address and comment on themes raised by the Parish Council, specifically in regard to queuing at school times and accessibility.
- 4.3 The queuing assessment along Chalton Lane showed that during AM and PM school peak times, queues didn't extend beyond the Nickleby Road junction and were quick to clear. Queues were also observed occasionally in the vicinity of the traffic calming feature, but this was due to oncoming vehicles and not because there were queuing obstructions in front of the feature (i.e. the traffic calming feature was fulfilling the purpose for which it was installed).
- 4.4 A review of HBC's *Clanfield, Waterlooville Pedestrian and cycling accessibility Improvements in Clanfield Feasibility Report* (March 2017) highlights improvements to Peel Park located just north of the proposed development. The improvements include connecting the pedestrian access to the skate park and play area, with a revised car park layout to accommodate pedestrians. In addition to this, the existing stepped southwestern access is proposed to be converted into a ramp with a link to a nearby pedestrian crossing at Chalton Lane. Despite these improvements being identified circa 7 years ago, these have not been implemented and could be something which the potential development could help fund.
- 4.5 The report also identifies improvements to the South Lane Sunderton Lane meadows to the south of the site. The proposals include an all-weather surface to serve as a shared use link from South Lane to Sunderton Lane. Existing conditions at the meadows were observed to have segregated pedestrian/vehicular accesses but no formal bound surface through the meadows. Again, surfacing of this route is something which the development could help deliver or fund, should this remain an ambition of the Parish/Borough.
- 4.6 Whilst there are no further improvements within the LCWIP or FR along the Sunderton Lane carriageway that would be beneficial for the proposed development to support, there may be an opportunity to improve the formal pedestrian network for residents on Sunderton Lane. This could be by providing a footway within the proposed sites' boundary flanking the western side of Sunderton Lane, which could tie into the existing infrastructure along Chalton Lane.

4.7 We trust the findings of this report are supported by Clanfield Parish Council and EHDC and provide a robust demonstration of the sustainability and active travel credentials of a proposed development at Land south of Chalton Lane.

## Appendix A



Time	Westbound (at Nickleby Road junction)	Eastbound (at Nickleby Road junction)
08:15	 <p>A photograph showing a westbound view of a road at the Nickleby Road junction. The road is paved and has a white dashed line marking. On the left side, there is a wooden fence and a tall street lamp. In the background, there are residential houses and trees under a cloudy sky.</p>	 <p>A photograph showing an eastbound view of a road at the Nickleby Road junction. The road is paved and has a white dashed line marking. On the left side, there are large, leafless trees and a grassy area. In the background, there are residential houses and trees under a cloudy sky.</p>
08:20	 <p>A photograph showing a westbound view of a road at the Nickleby Road junction. The road is paved and has a white dashed line marking. On the left side, there is a wooden fence and a tall street lamp. In the background, there are residential houses and trees under a cloudy sky.</p>	 <p>A photograph showing an eastbound view of a road at the Nickleby Road junction. The road is paved and has a white dashed line marking. On the left side, there are large, leafless trees and a grassy area. In the background, there are residential houses and trees under a cloudy sky.</p>

08:25



08:30



08:35



08:40



08:45



08:50



08:55



09:00





Time	Westbound at Nickleby Road junction	Westbound (at traffic calming)	Eastbound (at traffic calming)
14:50			
14:55			
15:00			

15:05



15:10



15:15





15:20



15:25



15:30



15:35



15:40



# **REGULATION 18 CONSULTATION**

Local Plan 2021-2040

Prepared by Pro Vision on behalf of Bargate Homes Ltd

March 2024

LOCAL PLAN 2021-2040  
REGULATION 18 CONSULTATION  
PROJECT NO. 50229

PREPARED BY:



ASSOCIATE DIRECTOR

CHECKED BY:



DATE:

MARCH 2024

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**APPENDICES**

Appendix A – Extract from 2018 LAA ref.AL-013 Land at Weysprings, Alton

## 1.0 Introduction

- 1.1 The following representations are made on behalf of Bargate Homes Ltd ('Bargate') in response to the latest East Hampshire draft Local Plan 2021-2040 (Regulation 18) consultation ("the draft Local Plan").
- 1.2 Bargate have a controlling interest in land at Penilee, South Medstead (LAA/MED-005), amongst other interests in the area, being a high-quality house builder based in Hampshire.
- 1.3 The latest amendments to the National Planning Policy Framework (December 2023) continue to promote the Government's objective of "*significantly boosting*" the supply of homes<sup>1</sup>.
- 1.4 Bargate consider that as currently drafted, the proposed Spatial Strategy would struggle to meet the area's objectively assessed needs (OAN)<sup>2</sup> and is not consistent with achieving sustainable development. Therefore, the draft Local Plan is unsound and in conflict with the NPPF.
- 1.5 These representations will demonstrate that some proposed housing allocations on which the draft Local Plan relies to deliver the Spatial Strategy are questionable in terms of deliverability and/or suitability.
- 1.6 It will also be demonstrated that the evidence base which underpins the Spatial Strategy is flawed in some important respects.

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<sup>1</sup> NPPF#60

<sup>2</sup> NPPF#11

## 2.0 Amount of development and Spatial Strategy

2.1 The Spatial Strategy in the draft Local Plan sets out the level and type of development that is considered appropriate for different places. This stems from the NPPF<sup>3</sup> which states:

*“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.*

2.2 For the draft Local Plan to be ‘sound’ it must be<sup>4</sup>:

- Positively prepared;
- Justified;
- Effective; and
- consistent with national policy.

2.3 The draft Local Plan identifies a minimum need for 10,982 new homes across the District, including the National Park, during the plan period (578 homes per annum). Housing need outside the National Park is identified as 8,816 homes (464 homes per annum) over the plan period.

2.4 The LPA estimates that there will be an unmet need in the National Park of 14 dwellings per annum over the plan period.

2.5 The remaining 100 homes per annum directed to the National Park equates to 1,900 homes over the plan period. Therefore, the draft Local Plan concludes<sup>5</sup> that the minimum number of homes required in the local plan area between 2021 – 2040 is 9,082 homes (478 homes per annum).

2.6 However, the only major settlements within the part of the National Park which falls within the EHDC administrative area are Petersfield and Liss. The adopted South Downs Local Plan (2019) makes provision for only 4,750 homes over the plan period (2014-33) for the entire National Park area, with Petersfield delivering 805 homes and Liss 150.

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<sup>3</sup> NPPF#60

<sup>4</sup> NPPF#35

<sup>5</sup> Draft policy S1 (Spatial Strategy)

- 2.7 It is therefore highly questionable whether 1,900 homes over the plan period within the National Park area is appropriate or deliverable. Many of the residual 945 homes should be directed to locations outside the National Park, where there is likely to be greater prospect of delivery and greater prospect of the infrastructure to support the growth.
- 2.8 In addition, the evidence base does not include a Statement of Common Ground with Havant Borough Council (HBC) regarding the Duty to Cooperate (DtC). Havant currently has a seriously low housing supply (1.8 years<sup>6</sup>) and their draft Local Plan was withdrawn from Examination in March 2022.
- 2.9 Further, the draft Local Plan acknowledges<sup>7</sup> *“The total unmet needs of neighbouring authorities are currently unknown...”* whilst the PfSH Position Statement identifies an unmet need across the sub-region of c.12,000 to 2036.
- 2.10 The draft Local Plan is only seeking to meet the minimum requirement based on the Standard Method. We consider this falls short of the Government’s objective to significantly boost the supply of homes and is missing opportunities to plan more positively.
- 2.11 The Council’s own evidence base points to the likelihood of justifying a different approach:  
  
*“If anything the data would point to a need higher rather than lower than the Standard Method; however some caution needs to be exercised in interpreting this as we do not know what the next set of (2021-based) ONS projection will say, and we do not know the specific methods to be used by ONS. However, it would be prudent of the Council to consider the relevance of any new projections as they are published (not until sometime into 2024).”*  
[Testing the Standard Method – Sept 2023].

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<sup>6</sup> HBC 5YHLS update – March 2023

<sup>7</sup> dLP paragraph 3.8



### 3.0 Delivery

3.1 The draft Local Plan states that the housing requirement of 9,082 homes will comprise:

Completions	940
Commitments	3,965
Windfall	1,320
Allocations	2,857
Total	9,082

Table 1

#### Completions

3.2 The latest Annual Monitoring Report<sup>8</sup> (AMR) shows that between 2011 – 2023, EHDC fell short in the delivery of housing against the annual requirement<sup>9</sup>. Whilst this shortfall (-58) is relatively modest, it is more concerning that the annual requirement was only achieved in 4 of the 12 years i.e. the overall results are misleading, with strong delivery in a small number of years.

#### Commitments

3.3 Overall, the deliverability of existing commitments is not disputed to any significant extent – any disputes are not considered to be material to the overall delivery.

#### Allocations

3.4 The draft Local Plan seeks to deliver approximately 1,700 new homes to Alton, with approximately 1,000 of these on a single urban extension at Neatham Manor Farm (draft policy ALT8). Leaving aside the risks in relying on the delivery of a single large site to meet so much of the identified housing need, the preferred site is considered questionable for the following reasons:

- **landscape impact** – the draft Local Plan acknowledges the potential for adverse visual and landscape impacts, noting a “strong sense of rural tranquillity”. The proposals will significantly extend development beyond the existing built envelope of Alton and will urbanise the existing downland by ‘jumping’ the A31 – a defensible boundary which has long contained the urban edge. Nearby land at Windmill Hill, on the Alton side of the A31 (2018 LAA ref.AL-013), was previously rejected for inclusion in the LAA, let alone as an option for allocation, with the Council stating that the site was undevelopable, concluding

<sup>8</sup> January 2024

<sup>9</sup> AMR table 6

*“the area has a rural character and is visible from a distance. Development would have an adverse impact on the intrinsic character of the countryside and landscape”*. An extract of the 2018 LAA is attached at Appendix A. A Landscape Value Study prepared by Terra Firma (on behalf of EHDC) in July 2020 concluded that the landscape at Neatham Down was of “medium to high value”. Other option sites considered by Terra Firma were acknowledged as having a lower value in landscape terms.

- **adverse impact on the setting of the South Downs National Park** – the National Park is a short distance from Alton and the A31. Major development in this location will have irreparable negative consequences on the setting of this valued landscape. Further, the allocation of Neatham Down could prompt future growth in this location, which would further erode the setting of this special landscape.
- **access** – the proposed development of 1,000 new homes has a single point of vehicular access, off the A31 roundabout. This could have severe consequences in the event of the access becoming blocked in an emergency situation. Guidance advocates the availability of an alternative access on large sites. The draft Local Plan itself acknowledges that it has not yet been demonstrated that the proposal would not have an adverse impact on the highway network. Without this understanding, the site should not be taken forward for allocation in this plan.
- **loss of agricultural land** – the draft Local Plan acknowledges that proposals will result in the loss of Grade 3 agricultural land. Other option sites comprises poorer quality land. National planning policy has recently been updated to add greater significance to the protection of food producing land<sup>10</sup>.

3.5 Approximately 65 homes at Whitehill & Bordon (draft policies W&B3 and W&B4) promote the clearance of over 2ha of woodland. This contradicts the Government’s objective to deliver significant net gains in biodiversity. There are alternative sites available which do not promote the clearance of sensitive natural habitats and which should be considered more favourably in the first instance.

3.6 Approximately 118 homes at Horndean (draft policy HDN2) does not rely on any existing defensible boundary and creates an arbitrary northern edge to the settlement which will

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<sup>10</sup> NPPF#181 Footnote 62.

narrow the undeveloped gap with the village of Catherington (and its Conservation Area) to approximately 100m.

- 3.7 Similarly, a further 38 homes at Horndean (draft policy HDN3) will erode the narrow gap to the village of Clanfield, which is already less than 100m at its narrowest. A further 80 homes at Clanfield (draft policy CFD2) does not rely on any existing defensible boundary and creates an arbitrary western edge to the settlement which will narrow the undeveloped gap with the village of Catherington.
- 3.8 At Rowlands Castle, 51 homes (draft policy RLC3) are constrained by ancient woodland and flood risk. Taking the constraints into account, including the need for significant buffers around the protected areas, the net developable area is arguably closer to 1ha than 2.7ha and hence the deliverability of 51 homes at a high density in this rural location is questionable. If the site is deliverable at all, a lower density scheme of c.20 dwellings is likely to be more appropriate.
- 3.9 The southern Parishes (Horndean, Clanfield, Rowlands Castle) are all affected by water quality issues and constrained by the need to demonstrate nutrient neutrality (NN). This places further pressure on the economic viability of sites where development can only be mitigated by purchasing nutrient credits.
- 3.10 The above raises questions about the suitability of approximately 250 homes from the draft allocations, before the appropriateness of Neatham Down (1,000 homes) is even considered. This is clearly at odds with the NPPF<sup>11</sup> which seeks to ensure that a sufficient amount and variety of land can come forward where it is needed in order to significantly boost the supply of homes. Therefore, alternative sites should be considered in order to achieve this, either replacing these sites or by providing additional supply.

#### *Windfall*

- 3.11 The NPPF<sup>12</sup> notes that where an allowance is to be made for windfall sites as part of an anticipated supply *“there should be compelling evidence that they will provide a reliable source of supply”*.
- 3.12 The draft Local Plan asserts that a consistent number of windfall homes have contributed to housing delivery over a number of years. This is disputed by Bargate Homes.

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<sup>11</sup> NPPF#60

<sup>12</sup> NPPF#72

- 3.13 The Windfall Allowance: Updated Methodology Paper (October 2023) notes that between 2011-2023 approximately 25% of all completions were windfall development. It suggests that this provides compelling evidence that windfall development has consistently delivered a significant proportion of the Authority’s housing completions. However, windfall development during the first half of this period performed reasonably strongly with 1,026 completions out of 2,972 (35%) coming from windfall development. Between 2018-2023 only 454 completions out of 2,884 were windfall development (15%).
- 3.14 Far from providing ‘compelling evidence’ for a reliable source of supply, these results indicate a clear decline, and that the logical response would be to rely less significantly on windfalls than in previous plans.
- 3.15 This decline is illustrated further by Figures 1-3 (in the Windfall Paper) which show that over the last 12 years, the average number of windfall completions has only been exceeded 4 times (in each case – major/minor/small development).
- 3.16 The Windfall paper acknowledges this decline in windfall development yet attributes it to the local planning authority being aware of more sites, and including them in Land Availability Assessments (LAA). However, this effectively hides the number of windfall completions and creates an unreliable way of establishing windfall delivery and calculating future provision. As defined in national policy<sup>13</sup>, ‘windfalls’ are all sites “not specifically identified in the development plan”. Therefore, windfall monitoring should have, and presumably has been, including all sites that are not allocated in the extant plan, whether in the LAA or not. In which case, there is not an extra category of windfalls in the LAA (which itself is not part of the development plan, but part of the evidence base), to explain the declining trend.
- 3.17 In addition to this decline in windfall delivery, it should be acknowledged that land is a finite commodity, and whilst large greenfield sites can be made available through the Local Plan process, it is less certain that windfall development will be delivered in large numbers in the future. In recent years, local plan policies, and changes to permitted development rights supporting a change of use of buildings to dwellings, has arguably swelled the amount of windfall development on small sites. Significantly, these small sites are generally not required to make provision for affordable housing. If provision was made for the equivalent number of homes on larger sites, through specific allocations in the development plan, it is likely that

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<sup>13</sup> NPPF Annex 2: Glossary.

considerably more affordable homes would be delivered. That approach accords with positive planning.

3.18 Importantly, the requirement for 9,082 new homes over the plan period represents a minimum not a maximum. The draft Local Plan is overly reliant on windfall development (nearly 15% of the overall requirement) despite the evidence showing that windfall completions are declining. This also suggests that the LPA are planning for delivery 'up to' the figure rather than exceeding it.

3.19 It would be more appropriate for the draft Local Plan to allocate more sites and thereafter, demonstrate how windfall development could contribute towards **significantly boosting** the supply of homes as a buffer, in addition to the minimum requirement, rather than an essential component of the minimum requirement.

*Accessibility – Four Marks/South Medstead*

3.20 As noted above, Bargate has a particular interest in land at Four Marks/South Medstead.

3.21 The evidence base relies on the '20 minute neighbourhood' concept. The Settlement Hierarchy – background paper (January 2024) refers to 'evidence' that 10 minutes is generally the threshold time period that people are willing to walk to a destination in order to access services (albeit this evidence is not presented). It adds:

*"This was found to relate particularly to rural areas, as it is evidenced that people walk less and have less willingness to walk further. It was therefore recommended that EHDC utilise the 20-minute neighbourhood concept based on reaching a destination within 10-minutes i.e. a 20-minute round trip."*

3.22 The draft Local Plan allocates new homes to the following sites in this settlement:

FMS1 (MED-022) – 90 dwellings – reasons for allocation:

- Well located for local facilities & services
- Scores above average in Accessibility Study
- Environmental constraints can be avoided/mitigated.

FMS2 (FM-015) – 20 dwellings – reasons for allocation:

- Scores above average in Accessibility Study
- Environmental constraints can be avoided/mitigated
- Opportunities to apply passive design principles.

FMS4 (FM-013) – 100 dwellings – reasons for allocation:

- Well located for local facilities & services
- Scores above average in Accessibility Study
- New connections to existing PRoW will promote healthy lifestyle
- Environmental constraints can be avoided/mitigated
- Opportunities to apply passive design principles
- New access to A31 could be provided.

3.23 It is unclear to us how the evidence base supports the selections of these sites over other sites in the LAA. Notably, land south of Winchester Road (draft policy FMS4) extends the built envelope further into the countryside along the A31 corridor, away from local facilities and services.

3.24 The draft Local Plan also acknowledges that “...*further consideration and discussion with the highways authority would be needed*” regarding access to land south of Winchester Road (FMS4), and identifies significant constraints for infiltration (SUDs).

3.25 Bargate has a controlling interest in MED-005 Land at Penilee. The 2018 LAA concluded that MED-005:

- lacks local infrastructure (incl. access) & services
- is in an unsustainable location
- is undevelopable.

3.26 The LAA and is flawed in its assessment of the site, and the results appear to be contrived, by concluding that it is an unsustainable location for residential development, when in fact, it is well related to the built envelope and within reasonable walking distance of a range of local facilities and services. An Appeal Inspector has allowed a development of 51 homes on a site within 50m of MED-005, concluding that it was in a sustainable location<sup>14</sup>. Given that it was common ground in 2014 that this is a sustainable location for new residential development, it is unreasonable to conclude otherwise now. There are no other known technical constraints preventing delivery of MED-005.

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<sup>14</sup> APP/M1710/A/14/2225146 Land North of Boyneswood Lane, Medstead, GU34 5DZ

3.27 We fear that the results of the site selection process are contrived here by reference back to the 2018 LAA, which concluded that:

MED-022 (FMS1):

- lacks local infrastructure (incl. access) & services
- is in an unsustainable location
- is undevelopable.

FM-015 (FMS2):

- is vulnerable to surface water flooding
- is in a groundwater source protection zone
- will have an adverse impact on character of area

3.28 FM-013 (FMS4):

- is vulnerable to surface water flooding
- is in a groundwater source protection zone
- has access issues.

3.29 And yet these three sites are proposed to be allocated for housing.

3.30 The same reasons for concluding that MED-005 is not suitable for development have been applied to the sites that are now allocated for housing, and yet MED-005 does not appear to have been given any further meaningful consideration.

3.31 Curiously, with reference to FM-013, the 2018 LAA adds *“the site presents the only opportunity in Four Marks for a major development along the A31 with pedestrian access to the shops, services and facilities”*. It concludes that *“the site is sustainably located for access to the services and facilities in Four Marks and forms a logical extension to the settlement”*. Assuming reference to the A31 means the broad A31 corridor, both these statements are seemingly untrue. After all, why would it be essential for an allocation to have access directly onto the A31? Why is MED\_005 any less appropriate?

3.32 It is noted that the Accessibility Report prepared by Ridge & Partners (January 2024) (which is a curiously recent report considering its purpose is to inform the proposed strategy published only a few weeks later) , applied an accessibility matrix to all LAA sites in the District. The following scores are noted with reference to Four Marks/South Medstead:

LAA Site:	Average Score
MED_022	8
FM-013	11
FM-015	8
MED-005	8

Table 2

3.33 Therefore, according to the Accessibility Report the performance of each of the sites is broadly consistent, and yet the report does not identify MED-005 as one of the potential Development Options (DO) at Four Marks/South Medstead. The methodology used to calculate ‘accessibility’ is not transparent and excessively complicated, with very limited scope to verify the output. As such, its reliability is questionable.

3.34 Similarly, the high-level assessment presented by the Integrated Impact Assessment (January 2024) and represented below illustrates a consistent performance between the same sites (albeit with FM-015 performing worse than the other three).

Extract from IIA – high level assessment

	IIA1	IIA 2	IIA 3	IIA 4	IIA 5	IIA 6	IIA 7	IIA 8	IIA 9	IIA10	IIA11	IIA12	Total* <sup>15</sup>
MED-005	0	++	0	--	+	++	0	+	+	-	0	0	9
MED-022	+/-	++	0	--	+	++	0	+	+	-	0	-	9
FM-013	0	++	0	-	++	++	0	++	+	--	-	-	9
FM-015	0	0	0	--	+	++	0	+	+	-	-	0	5

	Objectives
IIA 1	To protect, enhance and restore biodiversity across the EHDC planning area
IIA 2	To minimise carbon emissions and contribute to achieving net zero carbon emissions in the East Hampshire planning area.
IIA 3	To promote adaptation and resilience to climate change.
IIA 4	To promote accessibility and create well-integrated communities.
IIA 5	To actively promote health and wellbeing across East Hampshire and create safe communities free from crime.
IIA 6	To strengthen the local economy and provide accessible jobs and skills development opportunities for local residents.
IIA 7	To protect and enhance built and cultural heritage assets in the East Hampshire planning area.
IIA 8	To provide good quality and sustainable housing for all .
IIA 9	To conserve and enhance the character of the landscape and townscape.
IIA 10	To support efficient and sustainable use of East Hampshire's natural resources.
IIA 11	To achieve sustainable water resource management and protect and improve water quality in the East Hampshire planning area.
IIA 12	To minimise air, noise and light pollution in the East Hampshire planning area.

++	Significant positive effects likely	3
+	Minor positive effect likely	2
+/-	Mixed minor effects likely	1
-	Minor negative effects likely	-1
--	Significant negative effect likely	-2
0	Negligible effects likely	0
?	Likely effect uncertain	0

3.35 Interestingly, three of the sites score a double negative for accessibility, whilst FM-013 is scored a single negative. It is unclear how this conclusion has been reached especially given it is the furthest distance from local facilities and services.

<sup>15</sup> Total scores attached by author using individual scoring indicated, and appreciating that there is no weighting to the individual SA objectives.



3.36 Using a simple online mapping tool<sup>16</sup>, FM-013 is noted as being considerably less accessible to local services by foot as has been presented by the evidence base:

FM-013	Distance* <sup>17</sup>	Walking time
Recreation Ground (Sports Pavilion)	800m	11 mins
Mansfield Park Surgery	1300m	18 mins
A31 Local Centre (Tesco)	1600m	23 mins
Four Marks Primary School	2100m	28 mins
Medstead Primary School	3700m	52 mins

Table 3

3.37 In comparison, MED-005 performs better in terms of the 'walkable neighbourhood':

MED-005	Distance <sup>18</sup>	Walking time
Recreation (Chawton Woods)	850m	12 mins
Boundaries Surgery	700m	10 mins
A31 Local Centre (Co-Op) via Boyneswood Road	850m	12 mins
A31 Local Centre (Co-Op) via Station Approach	850m	12 mins
Four Marks Primary School	2900m	38 mins
Medstead Primary School	1400m	19 mins

Table 4

3.38 In addition, MED-005 is also accessible to the following local services:

MED-005	Distance <sup>19</sup>	Walking time
Mansfield Park Surgery via Station Approach	1000m	13 mins
A31 Local Centre (Tesco) via Station Approach	700m	10 mins
A31 Local Centre (M&S) via Station Approach	700m	10 mins

Table 5

<sup>16</sup> Google Maps

<sup>17</sup> Measured from centre of site frontage with A31 according to Google Maps

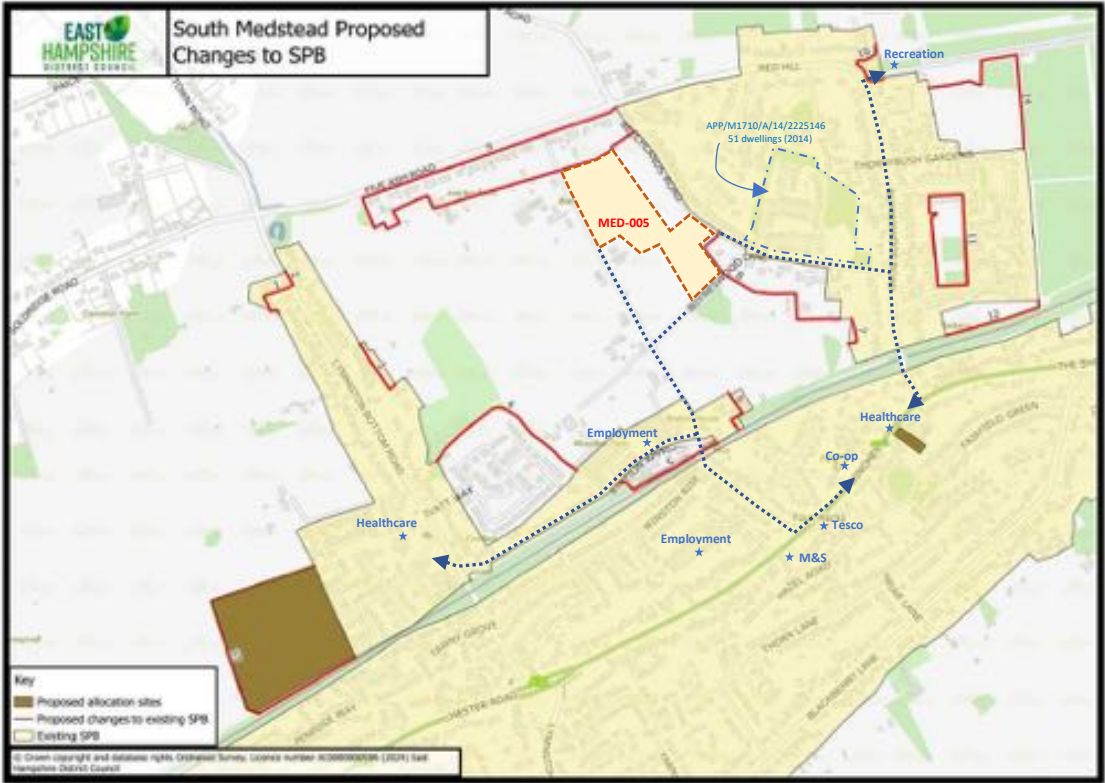
<sup>18</sup> Measured from centre of site frontage with Boyneswood Lane according to Google Maps

<sup>19</sup> Measured from centre of site frontage with Boyneswood Lane according to Google Maps

#### 4.0 LAA/MED-005 Land at Penilee, Beechlands Road, South Medstead

- 4.1 Land at Penilee is able to deliver up to 75 new homes and open space. It is relatively unconstrained by trees, ecology, topography, archaeology or highways. It is also controlled by a single landowner, so there are no complicated agreements needed.
- 4.2 The site can also deliver new links between existing public rights of way, providing improved connectivity between existing residential areas.
- 4.3 The site is approximately 850m to bus stops with regular services to Winchester and Alton. It is also 250m from the national cycle route linking Basingstoke to Alton.
- 4.4 The 2023 LAA is silent on the deliverability of MED-005. However, the 2018 LAA was flawed in its assessment of highway constraints north of the railway line, with specific reference to the railway bridges at Lymington Bottom and Boyneswood Lane, and associated junctions with the A31. The site location will enable traffic from the site to disperse onto the surrounding highway network in various directions, reducing the impact of development on any single junction. There is no available highways evidence that identifies either of the railway bridge crossings as a material constraint.
- 4.5 Foul drainage is available in new infrastructure recently installed in Boyneswood Lane and Stoney Lane, linking to Lymington Bottom Road via Station Approach.
- 4.6 The Interim Settlement Policy Boundary (SPB) Review Background Paper proposes amendments to the SPB at South Medstead by including:
- properties to the south of Boyneswood Lane, noting *“Properties along Boyneswood Lane are physically and visually attached to the existing urban area”*; and
  - properties to the south of Five Ash Road, noting *“Properties along Five Ash Road are physically and visually attached to the existing urban area”*.
- 4.7 Accordingly, the site has no landscape or visual impact on the South Downs National Park. It is also relatively discrete in the landscape/townscape, surrounded on three sides by existing built form. As a result, development of the site will not extend built form into open countryside and will preserve the designated gap between Four Marks and Medstead.
- 4.8 This creates a logical area for growth within an existing built-up area, avoiding extension of the built envelope into open countryside, or further along A31, away from local facilities.

4.9 The following is an extract from the Council’s Settlement Policy Boundary Review-January 2024 (MED-005 has been added for ease of reference, demonstrating that is well located for access to local services and facilities and in respect to the existing built environment) :



Extract from Interim Settlement Policy Boundary Review Background Paper (January 2024) – with additional annotations (blue)

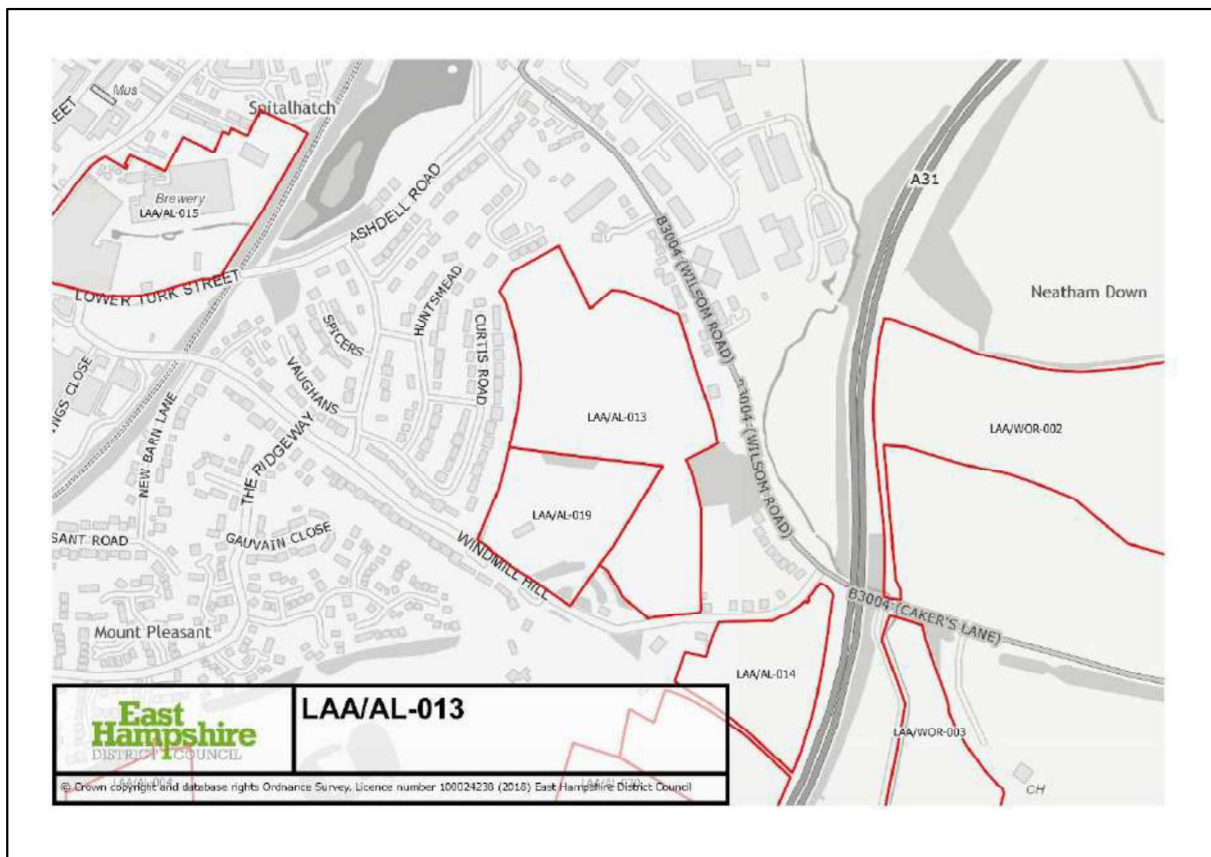
## 5.0 Conclusion

- 5.1 These representations demonstrate that some proposed housing allocations on which the draft Local Plan relies to deliver the Spatial Strategy are questionable in terms of deliverability and/or suitability.
- 5.2 They also demonstrate that the evidence base which underpins the Spatial Strategy is flawed in certain important respects, including in terms of the degree of reliance on windfall supply and homes in the national park. There are also concerns about the justification of the selection of sites, specifically in the Four Marks/South Medstead area.
- 5.3 We consider that the evidence justifies provision for more homes in the District, which should result in allocations of additional sites. We also consider that site selection, including those sites in Four Marks/South Medstead settlement, should be revisited with a transparently robust assessment of accessibility and other sustainable development indicators, otherwise the plan is at risk of being found unsound. .
- 5.4 Land off Beechlands Road, South Medstead (LAA/MED-005) is relatively unconstrained, walkable, and as such, in a sustainable location.
- 5.5 The site is deliverable – it is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered on the site within 5 years. Accordingly, it should be considered properly for allocation for up to 75 new market homes and affordable housing in the emerging Local Plan.

Appendix A – Extract from 2018 LAA ref.AL-013 Land at Weysprings, Alton

Site Information	
Site Reference	LAA/AL-013
Site Name	Land at Weysprings, Alton
Site Address	Land at Weysprings, Alton
Parish	Alton
Related settlement	Alton
Site Area (ha)	7.4
How the site was identified	Call for Sites Submission
Current Land Use	Agricultural
Promoted for	Residential (C3)
Planning Status	N/A

#### Map of site



<b>Environmental and Heritage constraints</b> e.g. SPA, Flooding, Listed Buildings, Conservation Areas	<ul style="list-style-type: none"> <li>There are a number of single and Area Tree Preservation Orders adjacent to the site to the north, west, and south.</li> </ul>															
<b>Current Policy Designation Constraints</b> e.g. countryside	<ul style="list-style-type: none"> <li>The site lies adjacent to the current settlement boundary of Alton and therefore in the countryside.</li> </ul>															
<b>Site Constraints</b> e.g. – Access - Utilities - Topography - Landscape - Design - Biodiversity	<ul style="list-style-type: none"> <li>The possibility of an archaeological constraint emerging is low.</li> <li>The site is particularly high in relation to the surrounding area with long distance views to the east and south.</li> <li>Access to the site from Windmill Hill, which is a narrow country lane with no footpaths.</li> </ul>															
<b>Planning History</b>	N/A															
<b>Is the site suitable? Can the identified constraints be overcome?</b>	<ul style="list-style-type: none"> <li>The design of any new development should not adversely affect the nearby TPOs.</li> </ul> <p>Whilst some identified constraints could potentially be overcome, this is not a suitable location for residential development, due to the rural character, landscape impact and openness of the site. Development would have an adverse impact on the intrinsic character of the countryside.</p>															
<b>Is the site available?</b>	Yes.															
<b>Availability information (Uses/Deliverability)</b>	The site has been promoted for residential (C3) use and is available in 0-5 years.															
<b>Market and Viability Factors</b>	An Interim Local Plan Viability Assessment has been prepared to support the draft Local Plan. The initial findings of this work in relation to the testing of notional sites, indicates that the development of this site for residential use is likely to be viable after factoring in costs associated with the draft Local Plan policies. The viability assessment of notional sites does not take account of any site-specific constraints.															
<b>Indicative Phasing, Delivery Timescales</b>	<table border="1"> <tr> <td>Completed</td> <td>0-5 years</td> <td>6-10 years</td> <td>11-15 years</td> <td>15+ years</td> </tr> <tr> <td colspan="5" style="text-align: center;">Number of dwellings</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Completed	0-5 years	6-10 years	11-15 years	15+ years	Number of dwellings									
Completed	0-5 years	6-10 years	11-15 years	15+ years												
Number of dwellings																
<b>Site Deliverability</b>	The area has a rural character and is visible from a distance. Development would have an adverse impact on the intrinsic character of the countryside and landscape.															

#### LAA Category

Undevelopable.
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**From:** [REDACTED]  
**Sent:** 08 March 2024 12:55  
**To:** [EHDC - Local Plan](#)  
**Subject:** [REDACTED] - Draft Local Plan regulation 18 consultation comments  
**Attachments:** [scan0665 Local Plan 2021-2041 Regulation 18 Comments March 2024..pdf](#)

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

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

Dear Policy Team,

Please accept these comments as part of the Draft Local Plan Regulation 18 consultation.

I have recently had a conversation with Amanda Dunn regarding the future submission under LLA of a site belonging to myself and the adjoining landowner [REDACTED].

I clarify this because I have referred to this land as an alternative site for the allocations proposals for development at Drift Road and White Dirt Lane within my formal objection comments.

The site I refer to is 4 hectares and adjoins the settlement of Glamorgan Road and White Dirt Lane in Horndean. The reason for these LAA submissions is to offer the Local Planning Authority an alternative site to the one provisionally proposed for allocation for the provision of 80 new dwellings.

The formal submissions for this alternative site will follow under separate cover from each landowner as directed by the LAA formal forms.

As these submissions are time sensitive I would be grateful for an acknowledgement of receipt. Thank you. Kind regards [REDACTED].

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[REDACTED]

 [scan0665 Local Plan 2021-2024 Exhibit Items 1-13 March 2024.pdf](#)





# East Hampshire District Council Local Plan 2021 - 2040

## Regulation 18 consultation 22 January - 4 March 2024

### Public Comments.

Submission date 4<sup>th</sup> March 2024.

The Local Plan is currently at regulation 18 consultation stage and EHDC has requested the public to comment on the Local Planning Authorities draft proposals that includes the period between 2021 to 2040.

The LPA have produced significant documentation in support of the draft proposals which clearly sets out in detail the rationale that has informed the decision-making process. Whilst the average member of the public is likely to have little knowledge of the planning system and the weight of the adopted policies of the final version of the adopted local plan, there are members of the public that have had significant dealings with the planning department at EHDC and the planning inspectorate and are therefore better informed to make comments that are relevant and not groundless. I consider that the following comments are relevant and are not groundless.

Any proposed policy changes must reflect the changes that have occurred since the current Local Plan was adopted in 2006, which is a significant duration of some 17 years which has afforded many opportunities for new development under the General Permitted Development Order and development that complies with the adopted policies. This is particularly relevant to settlement policy boundaries and designated local gaps that have been identified on the current mapping.

The LPA also has a requirement to align any policy objectives with those contained within the National Planning Policy Framework. The various changes to National Policy over the years have resulted in the LPA removing some of the adopted policies due to the conflict with National Policy. This approach needs to fully reflect the NPPF guidelines against the current saved policies.

The National Planning Policy Framework affords significant weight to any policy that aligns with the National Planning Policy Framework. The more the policy aligns with National Planning Policy Framework the more weight it will carry. The less it aligns with National Policy the less weight it will carry. Should the LPA adopt a policy that does not accord with the National Planning Policy Framework it should not expect that policy to carry any weight, nor should it carry any weight.

This is particularly important in relation to planning appeals. The Inspectorate should be mindful of this at examination stage especially where it can be evidenced that the policy objective is having a detrimental effect on the national targets for housing supply and the requirement for a 5-year supply of land for housing needs. The planning authority policy advisors and the Inspectorate also needs to have careful consideration of any significant changes with regards to areas of special protection that have evolved over the period from the adoption of the local plan in 2006 and the current draft local plan. These changes will have an impact on the surrounding area's ability to sustain the current level of protection such as the local gaps and settlement policy boundaries. The South Downs National Park completely separates the district from north to south leaving very little land to the south of

the National Park within the jurisdiction of EHDC. Having this significant special designated area of protection from future development around the boundaries of the remaining part of the district will no doubt significantly impact on the quantity of land available for development that doesn't conflict with current saved policies.

It is the role of the officers of the council to advise the elected members on the content of the National Planning Policy Framework particularly any conflict with the saved policies and any other planning practice guidance issued by the government. It is the role of the elected members to decide the content of the policies and which policies are adopted within the Local Plan. It is therefore the responsibility of the elected members to make sure the adopted policies of the Local Plan deliver the right outcomes for the people that live in the district. The National Planning Policy Framework requires a 5-year housing land supply that is deliverable, and that sufficient land is available over the plan period. Any shortfalls in the supply of deliverable land are directly the responsibility of the elected members Not their advisors.

It is therefore relevant and necessary to examine the council's recent performance record on the delivery of a 5-year housing land supply to judge the suitability of the policies they are intending to save for the duration of the new adopted plan. If the available land supply targets set by National Policy have not been met by the current saved policies, then it is unambiguously sound evidence that they are not delivering the desired outcome. This failing significantly impacts on the needs of the people who live in the area, especially close relatives who wish to have a home in the settlement they have and wish to continue to have, an association with.

It is a matter of fact that the LPA could not provide a 5-year housing land supply in 2014 resulting in the need to provide an interim housing policy statement that reflected that fact. A call for sites adjacent to existing settlement policy boundaries prompted me to submit a planning application to provide 4 dwellings on my land as it was immediately adjacent to the settlement of Glamorgan Road and White Dirt Lane in Catherington. The local planning authority refused the proposed development, and subsequently an appeal was made.

The LPA convinced the Inspector at the appeal that the 5-year land supply shortfall at the time of refusing the application could be delivered, siting 700 houses on Land East of Horndean within the plan period up to 2019. We are 5 years on from 2019 and still not one house has been built on the site at Horndean. It should also be noted that the LPA have declared a further shortfall in the current housing land supply, so it is clearly demonstrable that the adopted policies that are being relied upon are not delivering the houses needed to satisfy the District Council's needs. The selection of deliverable sites on time is key to the supply of much needed housing.

Adopted policies that are saved need to demonstrate a robust evidence base that they are contributing in a positive way in delivering the planning outcomes that are required by the National Planning Policy Framework. The framework promotes local authorities to adopt Local Plans so they can be assessed by the Inspectorate for policy soundness. In the event that local authorities persistently underdeliver the 5-year land supply inspectors are respectfully expected to address the reasons for this and give a positive steer to local planning authorities to overcome their failings. In this regard I make the following

comments in relation to the saved policies that are, in my opinion, contributing to this under delivery of housing land supply.

The current local plan saved policies refer to two particular policies that carry little or no weight with the National Planning Policy Framework which is predominantly silent on both these policy objectives. I am very concerned that this planning position is, as a matter of fact, having an adverse effect on the availability of suitable sustainable sites for residential development. I make the following comments hoping that the officers and members will review the policy objectives that are having such profound adverse impacts on delivering the housing needs of the area.

The first policy I refer to is CP 19 that predominantly deals with development in the countryside which is stated to be land outside of settlement policy boundaries. The policies' main objective is to only allow development outside of settlement policy boundaries, with a genuine and proven need for a countryside location. This restriction significantly restricts any opportunity for a settlement to expand thus increasing the housing supply that would provide local people with the opportunity to remain in the settlement they have an association with. Moreover, local people should have an opportunity to evaluate every possibility of future expansion of settlements outside of the restraints of this countryside restraint policy.

After all the settlements housing needs and amenities is as important to local people as the countryside. A balance must be made that contributes to both the settlements and the countryside. The current policy CP 19 does NOT deliver that balance.

The current planning policies relies upon local landowners offering up land for future development that may or may not be suitable to the local authority. Sites within 800 metres of a settlement policy boundary are considered suitable for assessment. The LPA can only select a site from what is made available by willing landowners which doesn't mean it is the most suitable location for the planned development of housing supply.

The local planning authority hold a register of land availability through a site submission process where landowners simply offer up their land for development assessment. The current adopted policies are there to specifically guide developers and landowners where new development will be approved and where it will be restricted. Having regard for this significant restrictive policy objective of general restraint on land outside of settlement policy boundaries, it is reasonable to assume that some landowners will simply not put their land forward for development assessment, as it has already been pre-judged as being a significant policy conflict. I am personally one of those landowners in that category who have not previously put my land forward for the reasons I have stated, so I know it is applicable.

I see the settlement boundary delineation a significant unreasonable restriction to development that would otherwise be acceptable on other planning merits in many cases. The National Planning Policy Framework states "development that can reasonably permitted should be permitted without delay. The settlement policy boundary review interim methodology paper December 2018 states,

Para 2.1 "National policy remains largely silent on any specific requirement for settlement boundaries. The National Planning Policy Framework (NPPF) and

*Planning Practice Guidance (PPG) do identify for certain specific policy boundaries, with town centres for re-tail planning purposes and green belt being the main areas that feature. However, there is no set guidance within the NPPF or PPG on how to review settlement policy boundaries.*

Whilst the planning authority except there is no set guidance for reviewing settlement policy boundaries it is clear that the LPA have not aligned their policies to reflect there is no national set guidance for using them in the first place other than for Town Centres and Green Belt land designations.

*Para 2.2 The NPPF does provide guidance around the approach to development within rural areas. The NPPF states that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning Policies should identify opportunities for villages to grow and thrive, especially where this will support local services". Para 38*

*Para 2.3 "it therefore falls to local planning authorities to consider what is appropriate in terms of development within various settlements and the resultant need for specific boundaries around settlements".*

It is questionable by the above guidance how settlements can be viewed differently to villages. Planning Policies should identify opportunities for villages to grow and thrive. For settlements to grow and thrive they must not be so tightly restricted by settlement boundaries. As it falls to local planning authorities to decide what is appropriate in terms of development within various settlements and the resultant need for specific boundaries around settlements, I believe that an overwhelming case can be demonstrated that the settlement policy boundaries within the adopted policies of the Local Plan are not delivering the expansion of settlements needed to satisfy local needs.

The Land Availability Assessment (LAA) Methodology document dated September 2021 at para 2.1 states,

*"The role of the LAA is to provide information on the range of sites which are available to meet housing needs in the district (excluding the SDNP area). It is not a statement of council policy, and the document does not allocate land for development. It is for the **Local Plan process** itself to determine which of these sites are the most suitable to meet identified needs. The local plan advisors being the policy planning team should deliver future housing needs that comply with the saved adopted policies that serve and inform development planning officers in discharging their duties in assessing planning applications for residential development.*

It has been made very clear within the policy documents that the countryside should be protected for its own sake. It is therefore questionable at best why the LPA consider it acceptable to put forward sites at any time for future housing needs on land outside of settlement policy boundaries. The stark reality of this is that the settlement policy boundaries have been drawn so tight that they leave very little or no room for small scale development that does not significantly change the character of a place. Instead, some of the proposed sites are large scale development that significantly changes the character of the area.

The settlement policy boundary methodology document outlines what the purpose of settlement policy boundaries is, and states,

*"In planning terms, settlement policy boundaries are shown on a map and are a policy tool used to indicate where particular policies in the local plan (or neighbourhood plans) that permit development within settlements or restrict development outside settlements, apply. As such, they help to prevent unplanned expansion".*

At section 1.4 it lists several advantages for settlement policy boundaries and 1.5 it lists several disadvantages for settlement policy boundaries.

At section 1.4 There are **several advantages** of settlement policy boundaries:

*Ensure development is directed to more sustainable locations, both in terms of accessibility to and support of existing services and transport, and in terms of landscape.*

Sustainable areas are those defined as built up areas with or in close proximity to local services that will serve the day to day needs of the people living within the settlement. The settlement policy boundaries are tightly drawn around the existing settlements leaving very little or no opportunity for any future development within the settlement. Surely this restriction has the opposite effect. By restricting development that is reasonable to permit, it cannot be considered an advantage, which of course is the NPPF guidance.

Gradual small scale residential development is preferred to large scale development sites that significantly changes the character of the area, which will no doubt be areas in the countryside. Another so called advantage is that they will,

*Protect the countryside from encroachment of land uses more characteristic of built-up areas, conserve and enhance cultural heritage and natural beauty.*

The draft Local Plan identifies some large-scale proposals for residential development on land immediately adjacent to existing settlement policy boundaries. That is; land in the countryside that is protected by the adopted saved policies namely CP19. The council's claim that the policies protection from encroachment of land uses more characteristic of built-up areas seems to have been disregarded completely by these proposed sites.

The advantages listed within this document are virtually all in conflict with the draft Local Plan allocations proposals. It is clear that the conflict with the saved policies will merely delay development that should be considered against the National Planning Policy Framework gradually over the plan period. Instead, the LPA release it when they need to provide much larger scale development sites that significantly changes the character of a place.

**Several Disadvantages** of Settlement Policy Boundaries.

The list of disadvantages of settlement policy boundaries within the review document is equally balanced with the advantages of settlement policy boundaries. I consider on balance that there is not a convincing argument that this policy restriction is necessary and reasonable to control development that can reasonably be permitted without a settlement

policy boundary restriction and should be permitted according to the NPPF and PPG guidance that is silent on settlement policy boundaries.

I believe it is demonstrable here that more suitable locations for housing development can be brought forward for assessment gradually over the plan period if the settlement policy boundaries were not so restrictive by this countryside restraint policy or they were removed altogether. Settlements have naturally evolved over many years by developers or local people building properties in the places suitable for development. This is the sole reason we have got areas designated as settlements. It is unreasonable to restrict the expansion of these settlements on the grounds that they are adjacent to a countryside location.

It is clear from the proposed site allocations publication that the supply of 9,082 new dwellings within the plan period are substantially on land outside of the settlement policy boundaries. Moreover, the sites put forward for development unambiguously limit the LPA policy planning officers to those put forward that are not necessarily the best locations for development that best suits local needs.

I will now move on to the second unreasonable policy restriction CP 23 '**Gaps Between Settlements**'.

The Gaps Between Settlements Background Paper dated January 2024 identifies,

*gaps between settlements are a planning tool to prevent coalescence of settlements and maintain their separate identity.*

The policy objective to prevent the coalescence of settlements thus protecting their separate identity has been the district council's policy from as early as the 1990s. The designation of this gap policy does not refer to landscape quality or character, or protection of the countryside. The council state that it is clear from previous local plan engagement that many communities consider maintaining separation between certain settlements to be an important issue. I am not convinced that the public generally still consider them all to be relevant and necessary simply because the district council claim this.

It is said that it is only certain settlements that apply to this criterion, but the LPA have identified in the Clanfield, Catherington and Hordean mapping that virtually all of the available land outside the settlement policy boundaries is designated as 'gap' land. This policy unambiguously unreasonably restricts development in the only areas that are left for residential development. Thereby resulting in any new proposed development by the LPA, such as that identified within the proposed allocation sites, seriously conflicting with this policy.

The background paper states at para-1.4,

*The new local plan provides an opportunity to identify precise boundaries for the gaps that fall within the Local Plan area. This background paper sets out the methodology and criteria to identify these boundaries, with precise boundaries shown on the associated Policies Maps.*

The paper sets out the methodology and criteria that has been used to re-define the precise extent of the gaps. The base line being the original gap boundaries from the Second

Review Local Plan held on GIS supported by aerial photography and has been assessed against gap criteria listed within the document. The paper identifies the criteria followed by an explanation/comment that I have set out below for reference.

a) Open and undeveloped: A gap should generally be open and have an undeveloped nature. Ideally there should be an absence of existing urban activity, but this will not realistically be achievable.

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

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

d) Ecological values: A gap should not necessarily include nature conservation recognition as these are adequately protected.

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

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

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

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

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

*With regard to the methodology, it provides guidance and transparency to all interested parties on how the LPA has approached the boundaries associated with gaps.*

Taking all the above criteria into account the local planning authority have not considered how the restrictions imposed upon the areas of the gaps are affected by the designation of the South Downes National Park. Housing prices are a key consideration to local people, and it has been recorded in many previous heritage documents provided by the district council that everyone is entitled to a home of their own, whether that be in the form of rented housing or private ownership. Affordable housing for all will be promoted and expected. This gap policy will have a significant impact on the availability of residential accommodation that is likely to be required by people that cannot afford a property within the National Park Authority. Moreover, it will increase the property values of the existing settlements within the southern parishes that will make them more unaffordable.



As the council have acknowledged, the policy has been implemented since the early nineties at a time when properties in the area was not in as much demand as it is today. Times have changed and Covid 19 has forced a complete reset to all aspects of daily living. Housing nationally is being underdelivered year upon year by hundreds of thousands of homes, and we will all have to accept changes that will promote sustainable housing in sustainable locations.

The waiting list for council housing or any affordable housing is around 6 years at a minimum. It is questionable how the council can claim to deliver adequate housing needs over the plan period when it has failed to deliver a 5-year housing land supply in 2014 and at the current time. I am not convinced that Settlement Policy Boundaries and the 'gap' policy is not having an adverse impact on the supply of much needed housing for local people.

I would strongly urge the policy planning team and the elected members to reconsider these policies and remove the restriction so landowners can at least have the option to seek planning permission on land that adjoins an established settlement. Offering land within 800 metres of a settlement policy boundary for development under LAA will most certainly lead to more larger sites that significantly changes the character of a place rather than smaller sites that are more in keeping with the character of the settlement.

It has been stated that these settlements will be reassessed and where necessary will be redrawn to meet the main principles set out in the Settlement Policy Boundary Review interim methodology paper dated December 2018. This methodology paper has been produced in connection with the East Hampshire District Local Plan Regulation 18 Consultation. **I make the following formal objections.**

I object to the proposed development site at Drift Road Clanfield / White Dirt Lane. The development will encroach considerably on the perceived gap as well as the physical encroachment. The gap policy is intended to give travellers the impression that they have left one settlement before they arrive at the next. The reality here is when travelling along White Dirt Lane towards the settlement of Glamorgan Road and White Dirt Lane travellers will be directly viewing the settlement of Glamorgan Road and White Dirt Lane before they have left the extended settlement of Drift Road. There will be no perceived travelling time from one to the other and therefore the gap will not serve its purpose and will therefore not comply with the policy objective.

Moreover, the land proposed for this development is currently being used for the growing of crops and is contributing to agriculture. Such land uses are protected by policy. The landscape is completely open with the skyline unbroken by any development or vegetation. The impacts on the landscape at this site will be considerable with this proposed amount of housing.

Another landowner and I have an alternative more favourable site that is being made available for consideration for development. The site is approximately 4 hectares in total which will accommodate around 70 houses with adequate land available for landscaping. The Policy team will have an opportunity to evaluate this site that would have been put forward earlier had it been understood that the countryside restraint policies CP19 and CP23 would not apply to these recent allocation site proposals. The sites' location is shown on the plan I have marked R/S 1 **(Item 1)**

## Objection to the current change to Map 1 area 3 Catherington Proposed Changes.

As a landowner that is affected by the new proposal to include land/property at White Dirt Lane in Catherington I need to make **a formal objection** to the proposed changes identified on Map 1 relating to area 3 on the map. The Location/Description within the supporting text on page 72 refers area 3 as 120 White Dirt Lane and the Criteria/Principle is 1.2a. The Consideration/Recommendation states; Historic development, applications and appeals associated with numerous applications (36384). Proposed buildings and its curtilage adjoin the existing settlement and is closely related to the built form and has enclosing features. Action is to redraw boundary to include dwelling and curtilage.

It is clear from the description and action to redraw the boundary to include the dwellings and curtilage, that it is necessary to clarify the formal numbering of the planning units and true extent of the land referred to as curtilage as the plan does not reflect the sites actual physical boundaries.

The planning policy team first produced this plan Map 1 within the policy document in 2018. Since that time there has been two planning appeals on this site that need to be taken into account that have not been considered. The first appeal decision notice I refer to is APP/M1710/W/17/3182720 dated 23 March 2018. The inspector upheld the appeal and granted planning permission for its residential use. I have provided a copy for convenience.

**[Item 2]** The site is 120 White Dirt Lane. The development proposed is the erection of a detached residential annexe. Under the heading of Procedural Matters the inspector has determined the level of construction at the time of his site visit and the extent to which the residential building is currently being used. The inspector at para 4 refers to the planning unit as a flat as it is only the first floor that is being used as a dwelling.

At para 12 it states,

*"The council has referenced two development plan policies in its refusal reason: Policies CP20 landscape and CP 29 Design".*

It is clear here that the council did not consider CP19 which is concerned with development in the countryside. However, the inspectors approved planning consent conditioned the attachment of the annexe to a dwelling saying,

*"The point is that the annexe must be tied to the main dwelling, in order that appropriate control is exercised over the future use of the building on the site outwith the current settlement boundary where strict control over new development prevails".*

The relevant point here is that the inspector recognised that the settlement policy boundary would change and include the planning unit within the settlement boundary on revision. Prior to that revision the local planning authority issued a notice dated 20<sup>th</sup> December 2019 confirming that two new dwellings have been built on land at 114 White Dirt Lane in Hordean. Confirmation that the new dwellings would be known as "The annexe 114 White Dirt Lane PO8 0TW" and "Mountain Ash, 112 White Dirt Lane, PO8 0TW", with a location plan showing the new dwellings was also provided. **[Item 3]**

The new dwelling known as the annexe 114 White Dirt Lane was added to the valuation list for council tax purposes with an effective date of 17<sup>th</sup> February 2020. **[Item 4]** The dwelling

that the annexe was connected with was sold in February 2022. As a direct result of this, on the 28<sup>th</sup> April 2022, the council issued a notice confirming that the annexe at 114 White Dirt Lane PO8 0TW would now be known as 116 White Dirt Lane PO8 0TW. **[Item 5]** This is clear evidence that the settlement policy boundary should include the curtilage to this new dwelling in line with the principles 1 & 2a.

I now turn to the new dwelling known as Mountain Ash 112 White Dirt Lane PO8 0TW. The council issued a new dwellings completion notice for this dwelling on 14 November 2019. I have provided a copy of this notice. **[Item 6]** The garden land to this dwelling was the subject of an enforcement notice which was appealed against. This is the second appeal I refer to APP/M1710/C/21/3272527 which is in sole relation to the garden land at Mountain Ash 112 White Dirt Lane PO8 0TW not the planning unit itself.

I have attached a copy of the decision notice dated 21 March 2023. **[Item 7]** The appeal was upheld, and the enforcement notice was quashed. The decision notice confirms that the garden land that is now solely used in association with Mountain Ash 112 White Dirt Lane PO8 0TW has been used as a garden since 2006. The plan attached to the notice clearly shows the boundary extent is the legal northern boundary that separates the garden land from the adjoining land that belongs to Mr J Adams.

The land to the west within this enclosure is garden land that was not subjected to the enforcement notice. This is clear evidence that the curtilage to Mountain Ash 112 White Dirt Lane should be included within the settlement policy boundary as it satisfies the principles 1 & 2a.

The settlement policy boundary should extend along the northern boundary from the garden land of 112 White Dirt Lane westwards along the legal boundary that separates my land with Mr J Adams who is the owner of the field to the north of our mutual boundary. On the 28<sup>th</sup> November 2022 the council served a planning contravention notice in connection with the use of land on the north side of White Dirt Lane PO8 0TW. The alleged breach of planning control,

*within the last ten years and without planning permission, the alleged change of use to a mixed use of equestrian use, residential storage, and business storage.*

I have attached a copy of the first page of the PCN and the accompanying plan showing the area affected by the notice edged in red. **[Item 8]** I have also attached another plan marked RUS2 **[Item 9]** for reference. All of the land edged red on the PCN plan is coloured green and blue on the plan RUS.2. There are two outbuildings on the land—coloured green. One building is a former stable building built in 2016 and the other has been used for residential storage since it was constructed in 2017 or thereabouts. The former stable building has been built since 2016 and continually used since 2018 for domestic storage.

The green coloured land has been used since 2011 for residential storage of building materials a large vegetable plot and has been cultivated as a garden. The stable building was given planning permission when the land was permitted for domestic equestrian use in 2011. The other structure was built without the benefit of planning permission in 2017 or thereabouts. The blue coloured land has been used for residential garden since 2011 in connection with 120, 114 and then the annexe at 114 which is now known as 116 White Dirt Lane. All the above information was given within the PCN replies for the consideration of

the LPA. Aerial photographs will evidence the appearance of this land which is closely allied to the built form and not open countryside.

A site visit was carried out by an outside private planning consultant [REDACTED] and accompanied by [REDACTED] from the enforcement team. A number of photographs were taken by [REDACTED] of the site and the use of the buildings and have been passed on to me for my records. A full and thorough investigation was carried out and a report was submitted to the head of planning and the members. I received an email from [REDACTED] dated 14<sup>th</sup> July 2023 confirming that no further action will be taken, and these matters have now been concluded under delegated powers with the agreement of the elected councillors and the head of planning. I have provided a copy of this decision confirmation. **[Item10]** The documents I refer to are all available within the council's own records.

In view of the use of the land dating back to 2011 and the buildings for residential purposes dating back to 2017 or thereabouts it would appear that the areas of land coloured green and blue on plan RJS2 and the PCN plan area edged red, are now lawful in planning terms by the passage of time. I have provided an aerial photograph marked RJS 3 **[Item11]** that confirms that this area of land is allied to the built form, has enclosing features and satisfies principles 1&2a.

There is one other area of concern that I need to raise so that consideration can be given to including an area of land at White Dirt Farm Mews, White Dirt Lane PO8 0TN within the settlement policy boundary. I have provided a copy of an appeal decision notice APP/M/1710/W/21/3272727 dated 31 August 2021 in connection with a proposal to change the use of a commercial detached building into a residential planning unit. **[Item12]** Although the appeal was dismissed the inspector recorded under the heading of other matters at para-14

*Finally, although the appeal site is located in the countryside, it forms part of a cluster of buildings and is also adjacent to more established development. Accordingly, the appeal site is not isolated and therefore the requirements of Paragraph 80 are not applicable to this appeal.*

If the appeal site is not seen in isolation due to its association with more established development within the adjoining settlement, it is reasonable to conclude that the steer here from the Inspector is that it is part of the settlement of White Dirt Lane and Glamorgan Road. Inspectors will not lightly interfere with judgements of other inspectors and this judgement should be taken into account when re-defining the settlement policy boundary in this location. This development should be included within the settlement not excluded. I have provided a plan marked RJS4 **[Item13]** that shows the additional areas that should be included within the settlement policy boundary outlined in blue.

There is nothing in these objections personal to any of the officers or any of the members that have been referred to collectively.

I respectfully put these comments forward to all interested parties especially the elected members of the council. They are intended only to inform the decision-making process.

End of comments  
[REDACTED]

## CONSULTATION RESPONSE

NBE1



### OBJECTION AND COMMENT

1. Historically East Hampshire DC has maintained highly restrictive countryside planning policies in terms of residential development. Proposed Policy NBE1 seemingly supports only essential rural and replacement dwellings, the latter being the bulk of new dwellings provided.
2. Aside from this limited source, there are very few circumstances whereby new housing can be provided outside the Settlement Policy Boundaries (SPB) and these are captured in Policy NBE1. The stated reason why such a restricted approach to rural housing is proposed is essentially to protect the countryside. This policy framework is unduly restrictive and more so than Metropolitan Green Belt as it excludes infilling and, in all but heritage situations, the conversion of buildings to dwellings. Clearly Green Belt objectives include protecting the countryside and therefore the stated policy objective could be secured with a more permissive policy approach, including both infilling and conversion.
3. The policy has also become more restrictive than its predecessor Joint Core Strategy CP10. This policy allowed housing which was supported by a genuine community mandate or identified in a Neighbourhood Plan.
4. The restrictive nature of the policy is compounded by the absence of Settlement Policy Boundaries, which few settlements now benefit from. Rural housing needs to be carefully controlled but can allow significant benefits to accrue in terms of making best and beneficial use of unsightly sites and securing their restoration and adding to the critical mass of settlements. This can have benefits in terms of supporting existing village facilities such as shops, pubs and schools.
5. No real explanation is provided to explain why the policy is so restrictive and it cannot be to do with sustainability of location. Specifically, a site on the edge but outside of a settlement (with a SPB) will have the same or similar sustainability attributes as a site just inside the same SPB. In addition, if a location is inherently unsustainable (i.e. remote in NPPF terms) an application could be refused on that basis alone. Similarly, there is a separate gap policy (NBE11) which can be used to prevent coalescence of settlements.
6. The policy also appears to go against the general direction of travel in terms of Government Planning policy and the wider deregulation agenda. Specifically, Permitted Development rights such as Class Q allow agricultural buildings to be converted to dwellings, and therefore the principle of converting some rural buildings is established by this provision. Class MA also allows commercial buildings to be converted to residential including those within rural areas.
7. A further issue is that technology and changing lifestyle practices has made rural living more sustainable. These include home shopping, working from home, superfast broadband, electric cars and widespread use of domestic generation of electricity and other sustainable heat and energy provision. Rural Housing is therefore no longer inherently unsustainable and should not be viewed as such.

8. The policy is also drafted against a background of an absence of housing land supply. A shortfall in housing land supply has arisen twice in recent years and prevails now. The South Downs National Park has removed Petersfield and other smaller settlements as potential sources of housing land supply, and therefore EHDC position on housing land supply has become less robust as the spatial supply area has reduced as the proposed settlement hierarchy shows. In this context, making rural housing even more restrictive appears to serve only to narrow options for future housing land supply.

### **Summary**

The Policy is therefore considered unduly and irrationally restrictive. Further, it could fulfil its stated objective by being less restrictive by mirroring the NPPF suggested approach in relation to Green Belt, where conversion of buildings and infilling is supported. Small Scale housing where there is a genuine community mandate should also be supported.

**From:** [REDACTED]  
**Sent:** 04 March 2024 13:49  
**To:** [EHDC - Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Robert Tutton Town Planning Consultants Ltd obo [REDACTED] of Hook Cottage in Pattersons Lane - Local Plan Update - Hook Cottage, Pattersons Lane, Blendworth - Proposed revision to Settlement Boundary  
**Attachments:** [Site Plan and Photograph.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.

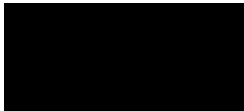
Dear Local Plans team

1. We have been instructed by [REDACTED] of Hook Cottage in Pattersons Lane to request that the Settlement Boundary to the north and south of his home be revised in the manner shown on the attached Site Plan.
2. The land the subject of this submission is situated on the west side of Pattersons Lane, within comfortable walking distance of the Horndean village centre which (as it is served by a post office, pharmacy, surgery and public houses) is recognised by East Hampshire District Council as being a "Large Local Service Centre". Furthermore, Portsmouth Road to the northwest forms part of the routes followed by four 'First' and 'Stagecoach bus services that take passengers north to Clanfield, south to Portsmouth; east to Havant and/or west to Cowplain. This is an accessible, sustainable location that is suitable for new residential development.
3. Hook Cottage is a Grade II listed building which was built in the 18<sup>th</sup> century but has been much-altered by the addition of a Gothic 'embellishment' to its south elevation. Approaching Hook Cottage from the south on Pattersons Lane, public impressions of its setting are hindered by the trees and other vegetation that stand within the highway. Dilapidated stables and other outbuildings to the north of Hook Cottage (shown in the attached photograph) detract from its setting; their residential redevelopment would offer the prospect of enhancement of the setting of the listed building.
4. A decade ago, the Joint Core Strategy asserted that *"Access to a decent home and a choice of housing are fundamental to the quality of life for people in East Hampshire"* but the District Council has failed to respond positively to the call by 34 parties who have registered their interest in erecting a self-build house in Horndean.

5. It is submitted that a modest northeastern extension of the Settlement Boundary of Horndean (in the manner shown on the attached drawing) would afford the opportunity to enhance the setting of Hook Cottage and widen the choice of housing in Horndean in a manner that respects and enhances the setting of the listed building.

We would welcome email confirmation of the safe and timely receipt of this submission.  
Thank you.

Kind regards,



***Robert Tutton Town Planning Consultants Ltd***  
23 Romsey Avenue, Fareham, Hampshire, PO16 9TR  
T: 01329 825985 E: [REDACTED]  
W: [www.planningfareham.co.uk](http://www.planningfareham.co.uk)







**From:** [REDACTED]  
**Sent:** 06 March 2024 14:31  
**To:** [EHDC - Local Plan](#)  
**Subject:** RE: Monday 4th March- Local Plan Consultation: deadline query  
**Attachments:** [EHDC draft Local Plan 2040 \(Regulation 18\) Consultation: Representations enclosed](#)

---

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

**Categories:** Requires written response, Consultation Responses

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Hi Sarah,

Thank you for your reply.

Please could you confirm safe receipt of our Repls submitted last Friday on the attached email thread?

Many thanks

Kind regards



---

**From:** EHDC - Local Plan <LocalPlan@easthants.gov.uk>  
**Sent:** Wednesday, March 6, 2024 9:35 AM  
**To:** Helena Taylor <Helena.Taylor@rpsgroup.com>  
**Subject:** RE: Monday 4th March- Local Plan Consultation: deadline query

**CAUTION:** This email originated from outside of RPS.

Good morning [REDACTED]

Thank you for your email.

The deadline for submissions has been extended until 5pm on Friday 8<sup>th</sup> March.

Kind Regards

[REDACTED]

[REDACTED]

Planning Policy Assistant

East Hampshire District Council  
Penns Place  
Petersfield  
GU31 4EX

[LocalPlan@easthants.gov.uk](mailto:LocalPlan@easthants.gov.uk)

01730 234102

---

**From:** [REDACTED]  
**Sent:** Thursday, February 29, 2024 4:54 PM  
**To:** EHDC - Local Plan <[LocalPlan@easthants.gov.uk](mailto:LocalPlan@easthants.gov.uk)>  
**Subject:** Monday 4th March- Local Plan Consultation: deadline query

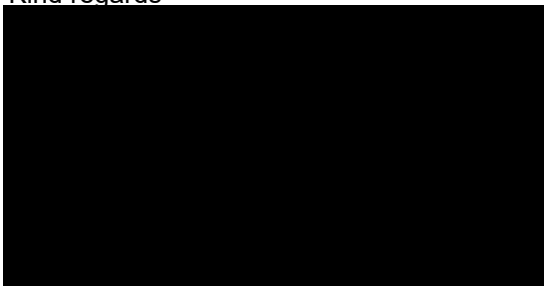
**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

Dear Sir/Madam

Please could you let me know the specific time of the consultation deadline during Monday 4<sup>th</sup> March to submit representations- i.e. is this within working hours (i.e. by 5pm?), or 11.59pm?

Many thanks in advance

Kind regards



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**Our ref: NPI00120**

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T +44 1235 821 888

Date: 1st March 2024

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

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

## **Representations pursuant to the East Hampshire District Council Draft Local Plan 2040: Preferred Options (Regulation 18) Consultation.**

On behalf of our Client, Vortal Homes Ltd, please find the enclosed representations in response to East Hampshire District Council's Draft Local Plan 2040 (Regulation 18) Consultation. The representations have been prepared from a housing delivery perspective and having regard to Vortal Homes' interest at Land at Whitedown Lane, Alton.

Whilst Vortal Homes is supportive of the preparation of a new East Hampshire District Council Local Plan, there are several key considerations that we recommend should be addressed; with particular focus on draft policies H1, H3, DM16 and ALT4.

The enclosed representations consider each of the relevant draft policies in turn, for analysis and recommended modification.

### **Emerging Local Plan 2040: relevant draft policies**

Of particular importance to this representation are draft policies H1, H3, DM16 and ALT4. Our considerations in relation to these are set out in detail below.

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

Draft Policy H1 seeks to identify the housing requirement for the Local Plan.

It is identified in the emerging local plan that there is *"a need to plan for a total of 9,082 dwellings over the Plan Period (478 x 19 years)"*. Acknowledging that a proportion of this requirement is already met, the draft Local Plan aims to allocate land *"for about 3,500 new homes"*. This figure is understood to represent an uplift from the calculated residual requirement of *'about 2,857 new homes'* to provide some allowance for flexibility for allocated sites not coming forward during the anticipated trajectory in the Plan Period.

**Our ref: NPI00120**

We note that the standard method has been used to calculate these housing figures. It is our view that the standard methodology figure should be strongly considered a minimum, in accordance with the NPPF (Paragraph 61) that clearly suggests circumstances may prevail where it is appropriate to consider housing need greater than the standard method indicates:

*‘To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.’*

We strongly agree that increased sources of housing land supply need to be identified to provide a tolerance buffer to mitigate inaccuracies or delivery delays in long term projections for the emerging local plan period.

This approach is further supported by:

- Previously evidenced supply shortfalls (East Hampshire Five Year Housing Land Supply Position Statement, October 2023 & Addendum January 2024); and
- The study of demographic data which suggests that more recent trends are generally pointing in an upward direction for housing need (East Hampshire Technical Note Update, September 2023).

Therefore, whilst we are supportive of the buffer incorporated to the standard method minimum housing figure of 2,857 new homes to the uplifted housing supply figure of 3,500, the methodology for the proposed 10-15% buffer figure is not clear. This chosen percentage figure should be justified to ensure the robustness of the emerging Local Plan, and we consider that there is scope to further increase this buffer to effectively plan for future growth.

Our concern in this regard is compounded when considered alongside the unmet housing need from neighbouring areas.

The NPPF (paras 24-27) requires Local Planning Authorities to maintain effective cooperation, known as the Duty To Cooperate:

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

25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans [...]

26. Effective and **on-going joint working** between strategic policy-making authorities and relevant bodies is **integral to the production of a positively prepared and justified strategy**. In particular, joint working should help to determine **where additional infrastructure** is

necessary, and whether **development needs** that cannot be met wholly within a particular plan area could be met elsewhere.

27. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should **prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these**. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

*\*RPS emphasis in **bold***

We note that the emerging Local Plan states:

*The total unmet needs of neighbouring authorities are currently unknown, however, considering the landscape sensitivity associated with the National Park, there is potential for some unmet housing needs from within the South Downs National Park area.*

Additionally, we note that the role of East Hampshire in meeting neighbouring unmet needs is discussed within the 'Partnership for South Hampshire Spatial Position Statement' December 2023. This Statement identifies East Hampshire as one of the authorities that '*should be able to meet and potentially exceed NPPF 2023 standard method -based housing needs*' in the '*short to medium term*'.

We strongly encourage collaborative working between relevant neighbouring authorities to establish accurate unmet need figures to ensure compliance with the Duty to Cooperate as appropriate. Without clarification on this unmet need position, we are concerned that the emerging Local Plan's ability to effectively plan for, and deliver, sustainable growth is limited.

## Summary

We welcome the application of a percentage buffer for housing delivery targets to ensure that flexibility is factored into the delivery of new housing over the plan period. This is a helpful mechanism to mitigate potential delays to the delivery of much needed new homes. However, the rationale for the application of just 10-15% buffer is unclear and requires justification, particularly when considered against the shortfall in East Hants' housing delivery to date.

Additionally, the dual purpose of this buffer – i.e. to mitigate delivery delays and for the surplus to also respond to the Duty to Cooperate - would unduly limit the beneficial impacts of the buffer.

We recommend that the housing requirement figure of 3,500 new homes is considered as a starting point. We consider that the unmet need of neighbouring authorities represents exceptional circumstances and in accordance with national policy on the Standard Method, East Hants should establish the accurate extent of unmet need and proactively deliver beyond this minimum figure. This approach would provide an opportunity to meet the pressing need for high quality market and affordable housing in the area under the commitment to the Duty to Cooperate.



## **Our ref: NPI00120**

To further support this endeavour, we strongly recommend that where proposed allocations in East Hampshire's key 'Tier 1' settlement (Alton) can deliver a higher quantum of development to meaningfully contribute to meeting the needs of East Hampshire's growth (in accordance with Policies S1 and S2), this should be encouraged and supported via modifications to the housing delivery figures attributed to the draft Local Plan allocation sites (such as ALT4).

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

This draft policy sets out the proposed requirements for developers to provide a proportion of affordable housing.

The Housing and Employment Development Needs Assessment 2022 (HEDNA) calculated the estimated annual need for affordable housing. It is concluded in the draft plan that developments increasing housing supply by 10 dwellings or more, or on sites over 0.5 hectares require at least '*40% of the net number of dwellings as affordable housing*'.

The proposed percentage of affordable housing as an overall target (40%) is consistent with that of the adopted Local Plan. Notwithstanding this, a review of East Hampshire's most recently published Annual Monitoring Report has identified that during the report year 2022-2023 an affordable housing delivery of just 30% of total completions was achieved.

Whilst we accept the approach to maintain the current requirement of 40%, we raise concern that this, alongside the prescribed tenure ratios introduced within this draft policy wording, has the potential to adversely impact housing delivery overall due to wider scheme viability implications. This is especially the case when considered in the context of previous performance shortfalls against this target and the new and additional policy requirements such as the mandatory (minimum 10%) provision of Biodiversity Net Gain on all applications for major development from 12 February 2024 onwards.

Indeed, potential viability constraints are recognised by the HEDNA which states "*...the amount of affordable housing delivered will be limited to the amount that can viably be provided. As noted previously, the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.*"

Accordingly, we request that this draft policy wording should be modified to include a caveat that where viability of a development is in question, the percentage of affordable housing on a site could be negotiated on a site-by-site basis.

Additionally, Planning Practice Guidance (PPG) suggests "*The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes*". Consistent with our recommendation for draft Policy H1, we therefore suggest that an increase in housing supply in alignment with PPG could help to achieve a greater quantum of affordable housing delivery in East Hampshire overall.

**Our ref: NPI00120**

## **Summary**

We consider that this draft policy wording should be modified to include a caveat to allow viability negotiations on a site-by-site basis, should the 40% affordable housing delivery target not be achievable. The requirement for affordable housing provision should be considered in the context alongside compliance with additional new policy requirements such as the delivery of Biodiversity Net Gain, to ensure that delivery of much needed new homes is not unreasonably impeded by viability considerations. An uplift in housing supply overall is also anticipated to assist with an increase in affordable housing delivery.

## **Draft Policy DM16: Self-build and Custom Housebuilding**

This draft policy states that *“On major development sites it is expected that a portion of the site is provided as self-build and custom build serviced plots in accordance with the needs of the individuals and groups on the Local Planning Authority’s self and custom build register at the time of the application.”*

To implement proposals for self-build and custom housebuilding it is stated that *“A proportion of the total home’s numbers shall be available for sale as self-build and/or custom housebuilding plots where there is an identified need on our Self-build and Custom Housebuilding Register”*.

Vortal Homes is supportive of self and custom build schemes and would welcome clarification regarding the quantitative commitment required to enable more Self/Custom Build plots to be built across the district over the emerging local plan period.

We understand from the HEDNA 2022 and the Council’s Self and Custom Build Register that demand for self-build and custom housebuilding exists within East Hampshire (albeit the Register published online is dated 2020-2021).

According to the Self-build and Custom Housebuilding Act 2015 the duty falls on the local authority to bring forward sufficient permissioned plots to meet the demand on the Council’s self-build and custom housebuilding register. We note that the Emerging Local Plan acknowledges the Council’s legal duty to grant sufficient development permissions to meet the demand for custom and self-build housing. The NPPF also requires local planning authorities to plan for the needs of different groups with specific housing requirements as part of their overall housing need and that land with permission is developed without unnecessary delay. Having regard to demand and market signals, the need to plan for people wishing to commission or build their own homes is specifically recognised in this context (NPPF, Paragraph 63).

## **Summary**

The draft policy pertaining to Self and Custom build is noted and further details on allocation of land and granting of planning permission for Self-Custom Build plots in locations where there is sufficient demand is welcomed. The proposed residential development of Land at Whitedown Lane could consider the provision of self-build plots in this regard, should the Council deem this to be appropriate.

**Our ref: NPI00120**

## **Draft Policy ALT4: Land at Whitedown Lane, Alton**

Further to our previous representations in support of the excellent prospects for residential development at Land at Whitedown Lane, we are pleased to note that this site has been identified as a draft allocation in the emerging Local Plan (site reference ALT4). Vortal Homes wholly support this draft allocation, and associated proposed amendment to Alton's designated settlement boundary, within the emerging Local Plan.

The site is ideally positioned to support the continued growth of East Hampshire's 'Tier 1' Settlement in the settlement hierarchy, Alton, and meaningfully contribute to its vitality in a plan-led manner. It is suitable, available and deliverable, and offers the opportunity to provide various types and tenures of much needed new homes, as appropriate. The connected location of the site to Alton also strongly aligns with sustainable development and travel initiatives in the spirit of East Hampshire's Climate Emergency declaration and pledge to become carbon neutral by 2035.

To ensure the proposed development of the site makes the most efficient use of land, we strongly recommend that a greater density of development on this site would be appropriate, in accordance with the objectives of Policy DES3:

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

The site appears broadly contained within the landscape and the proposed design work would take a landscape-led approach to feasibility, to ensure the layout would not be symptomatic of overdevelopment. As such, we recommend that the dwelling cap associated with this draft allocation could be modified to accommodate more than 90 dwellings on the site, if the Council considers it appropriate. This would allow the site the flexibility to meaningfully contribute towards unmet need in a highly sustainable location, whilst facilitating the provision of a variety of housing types and tenures, as appropriate.

Lastly, we request a modification to the proposed type of vehicular access to the site shown within the ALT4 draft allocation plan. This appears to indicate the inclusion of a roundabout, however we consider that the provision of a T- Junction would constitute an appropriate access arrangement. Our Client is willing to provide further detail and justification on this alternative proposed access design, should this be requested by the Council at this stage.

### **Summary**

We wholly support the draft allocation of this site for residential development and recommend that the housing delivery cap is lifted from 90 dwellings to accommodate a greater quantum of dwellings on the site, if the Council considers it appropriate, and subject to detailed design in this highly sustainable location. This will ensure that the flexibility for this site to explore a meaningful contribution towards a variety of much needed housing types and tenures is not unduly limited. A modification to the proposed vehicular access to the site, from a roundabout (as indicatively shown on the ALT4 draft allocation plan within the emerging Local Plan), to a T-Junction, is requested.

## Recommendations

In relation to housing strategy, the proposed mechanism of a percentage buffer for housing delivery targets above the standard method is welcomed to ensure that potential delays to the delivery of much needed new homes can be mitigated against. However, we consider that this percentage buffer should be increased, particularly owing to the Duty to Cooperate with neighbouring authorities on strategic housing issues. The extent of unmet need from neighbouring authorities should be established in order to accurately calculate the housing delivery figures proposed under draft Policy H1 and ensure the robustness and soundness of the emerging local plan.

In relation to affordable housing, we welcome the re-application of a 40% affordable housing requirement, subject to viability. This will allow the benefits of the current affordable housing delivery levels to be maintained, whilst ensuring that the viability of housing delivery is not unreasonably impeded when considered in the context of other new additional policy requirements, such as the delivery of Biodiversity Net Gain.

In relation to Self and Custom build, further details of locations where there is sufficient demand is welcomed, and Vortal Homes could consider provision of self-build plots in this regard at the Whitedown Lane site, should the Council deem this to be appropriate.

Vortal Homes wholly supports the draft allocation (ALT4) of the Whitedown Lane site for residential development and recommends that the dwelling cap of 90 units currently proposed could be lifted to allow the site to accommodate a greater quantum of development. The site offers an excellent opportunity to significantly boost the supply of much needed new homes, of potentially various housing types and tenures, in accordance with national guidance. We consider that a T-Junction would constitute the most appropriate vehicular access design for this site. The site's highly sustainable location would also ensure a meaningful contribution to Alton's continued vitality as a Tier 1 settlement in addition to alignment with East Hampshire's Climate Emergency and carbon neutral initiatives.

**From:** [REDACTED]  
**Sent:** 08 March 2024 13:54  
**To:** [EHDC - Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** EHDC draft Local Plan 2040 (Regulation 18) Consultation:  
Representations enclosed  
**Attachments:** [240308 Ropley Local Plan Reprs\\_Final.pdf](#)

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

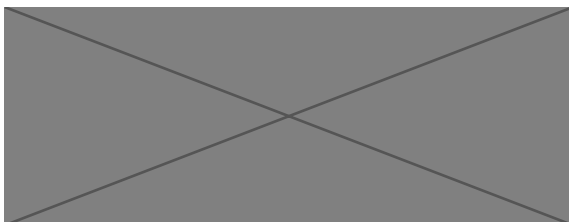
**CAUTION:** This email came from outside of the council - only open links and attachments that you're expecting.

Dear Sir/Madam

On behalf of our Clients, [REDACTED] (*Friday Street Ltd.*) please find the attached representations in response to East Hants District Council's draft Local Plan 2040 (Regulation 18) Consultation.

Your confirmation of receipt by reply would be much appreciated, with many thanks.

Kind regards  
Helena



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**Our ref: NPI00135**

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Date: 8th March 2024

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

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

## **Representations pursuant to the East Hampshire District Council Draft Local Plan 2040: Preferred Options (Regulation 18) Consultation.**

On behalf of our Clients, [REDACTED] and their (Hampshire-based) Hammonds Lane development partners, Friday Street Ltd., please find the enclosed representations in response to East Hampshire District Council's Draft Local Plan 2040 (Regulation 18 Part 2) Consultation. The representations have been prepared from a housing delivery perspective and having regard to our Clients interest in two separate parcels of Land at Hammonds Lane, Ropley.

Whilst our Clients are supportive of the preparation of a new East Hampshire District Council Local Plan, there are several key considerations that we recommend should be addressed; with particular focus on draft policies H1, S2 (including NBE1), H2, and H3.

The enclosed representations consider each of the relevant draft policies in turn, for analysis and recommended modification.

### **Emerging Local Plan 2040: relevant draft policies**

Of particular importance to this representation are draft policies H1, S2 (including NBE1), H2 and H3. Our considerations in relation to these are set out in detail below.

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

Draft Policy H1 seeks to identify the housing requirement for the Local Plan.

It is identified in the emerging local plan that there is *"a need to plan for a total of 9,082 dwellings over the Plan Period (478 x 19 years)"*. Acknowledging that a proportion of this requirement is already met, the draft Local Plan aims to allocate land *"for about 3,500 new homes"*. This figure is understood to represent an uplift from the calculated residual requirement of *'about 2,857 new homes'* to provide some allowance for flexibility for allocated sites not coming forward during the anticipated trajectory in the Plan Period.

**Our ref: NPI00135**

We note that the standard method has been used to calculate these housing figures. It is our view that the standard methodology figure should be strongly considered a minimum, in accordance with the NPPF (Paragraph 61) that clearly suggests circumstances may prevail where it is appropriate to consider housing need greater than the standard method indicates:

*‘To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.’*

We strongly agree that increased sources of housing land supply need to be identified to provide a tolerance buffer to mitigate inaccuracies or delivery delays in long term projections for the emerging local plan period.

This approach is further supported by:

- Previously evidenced supply shortfalls (East Hampshire Five Year Housing Land Supply Position Statement, October 2023 & Addendum January 2024); and
- The study of demographic data which suggests that more recent trends are generally pointing in an upward direction for housing need (East Hampshire Technical Note Update, September 2023).

Therefore, whilst we are supportive of the buffer incorporated to the standard method minimum housing figure of 2,857 new homes to the uplifted housing supply figure of 3,500, the methodology for the proposed 10-15% buffer figure is not clear. This chosen percentage figure should be justified to ensure the robustness of the emerging Local Plan, and we consider that there is scope to further increase this buffer to effectively plan for future growth.

Our concern in this regard is compounded when considered alongside the unmet housing need from neighbouring areas.

The NPPF (paras 24-27) requires Local Planning Authorities to maintain effective cooperation, known as the Duty To Cooperate:

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

25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans [...]

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



27. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should **prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these**. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

*\*RPS emphasis in bold*

We note that the emerging Local Plan states:

*The total unmet needs of neighbouring authorities are currently unknown, however, considering the landscape sensitivity associated with the National Park, there is potential for some unmet housing needs from within the South Downs National Park area.*

Additionally, we note that the role of East Hampshire in meeting neighbouring unmet needs is discussed within the 'Partnership for South Hampshire Spatial Position Statement' December 2023. This Statement identifies East Hampshire as one of the authorities that *'should be able to meet and potentially exceed NPPF 2023 standard method -based housing needs'* in the *'short to medium term'*.

We strongly encourage collaborative working between relevant neighbouring authorities to establish accurate unmet need figures to ensure compliance with the Duty to Cooperate as appropriate. Without clarification on this unmet need position, we are concerned that the emerging Local Plan's ability to effectively plan for, and deliver, sustainable growth is limited.

## Summary

We welcome the application of a percentage buffer for housing delivery targets to ensure that flexibility is factored into the delivery of new housing over the plan period. This is a helpful mechanism to mitigate potential delays to the delivery of much needed new homes. However, the rationale for the application of just 10-15% buffer is unclear and requires justification, particularly when considered against the shortfall in East Hants' housing delivery to date.

Additionally, the dual purpose of this buffer – i.e. to mitigate delivery delays and for the surplus to also respond to the Duty to Cooperate- would unduly limit the beneficial impacts of the buffer.

We recommend that the housing requirement figure of 3500 new homes is considered as a starting point. We consider that the unmet need of neighbouring authorities represents exceptional circumstances and in accordance with national policy on the Standard Method, East Hants should establish the accurate extent of unmet need and proactively deliver beyond this minimum figure. This approach would provide an opportunity to meet the pressing need for high quality market and affordable housing in the area under the commitment to the Duty to Cooperate.

## Draft Policy S2: Settlement Hierarchy

To further support the Housing Strategy endeavour set out within the section above, we strongly recommend that all Tiers within the Settlement Hierarchy are encouraged to pro-actively deliver a proportionate quantum of development in appropriate locations. This will allow a range of housing supply sites to contribute to meeting the needs of East Hampshire's growth (in accordance with Policies S1 and S2).

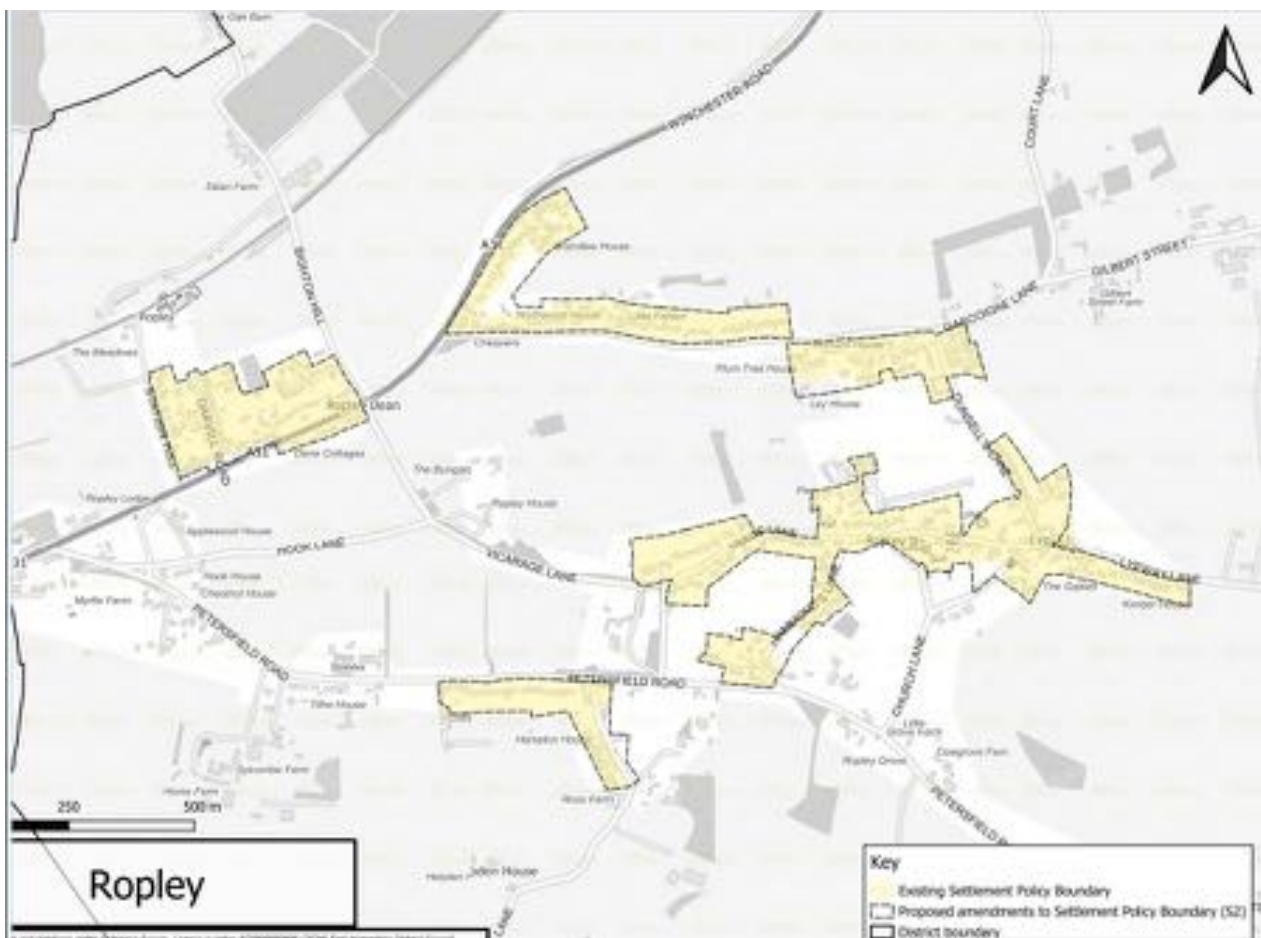
Draft Policy S2 identifies Ropley as one of seven Tier 4 settlements. These are described in the emerging local plans as:

*"...**focal points for the community** of their surrounding rural areas, often accommodating a local service or facility that helps to bring people together. The characteristics of these settlements vary, reflective of the diverse rural nature of East Hampshire. They are not intended to have the same amount of growth as each other; instead, the level of growth will depend on the role and function that they perform for the surrounding spatial area, and will be related to their location, size, range of facilities and services as well as the availability of suitable development opportunities. There may be some limited and small-scale development potential, **appropriate to the character and function** of the settlement to help **support the long-term sustainability** of rural communities."*

*\*RPS emphasis in bold*

It is clear that the development of the two Hammonds Lane sites will strongly accord with these objectives.

The designated Settlement Policy Boundary for Ropley is identified on the emerging Local Plan Policies Map:



**Our ref: NPI00135**

This plan shows that the settlement boundary for Ropley, whilst fragmented, is broadly centred towards the east of the village, and indeed the village hub or 'focal point' (as a Tier 4 settlement is characterised) is in the immediate vicinity of Hammonds Lane. Whilst we welcome the proposed amendments to the settlement boundary along some routes bounded by existing residential built form, these are unduly limited and there is scope to continue the application of this sympathetic and logical settlement boundary expansion to accommodate the proposed Hammonds Lane development.

The proposed Hammonds Lane development is comprised of two sites; located either side of Hammonds Lane, Ropley. Both sites have previously been promoted for residential development with EHDC under site reference codes 'ROP-008' and 'ROP-009'. An indicative site plan is presented below for ease of reference in this consideration:



**Our ref: NPI00135**

For ease of reference, the annotations on this indicative site plan (above) read as follows, clockwise:

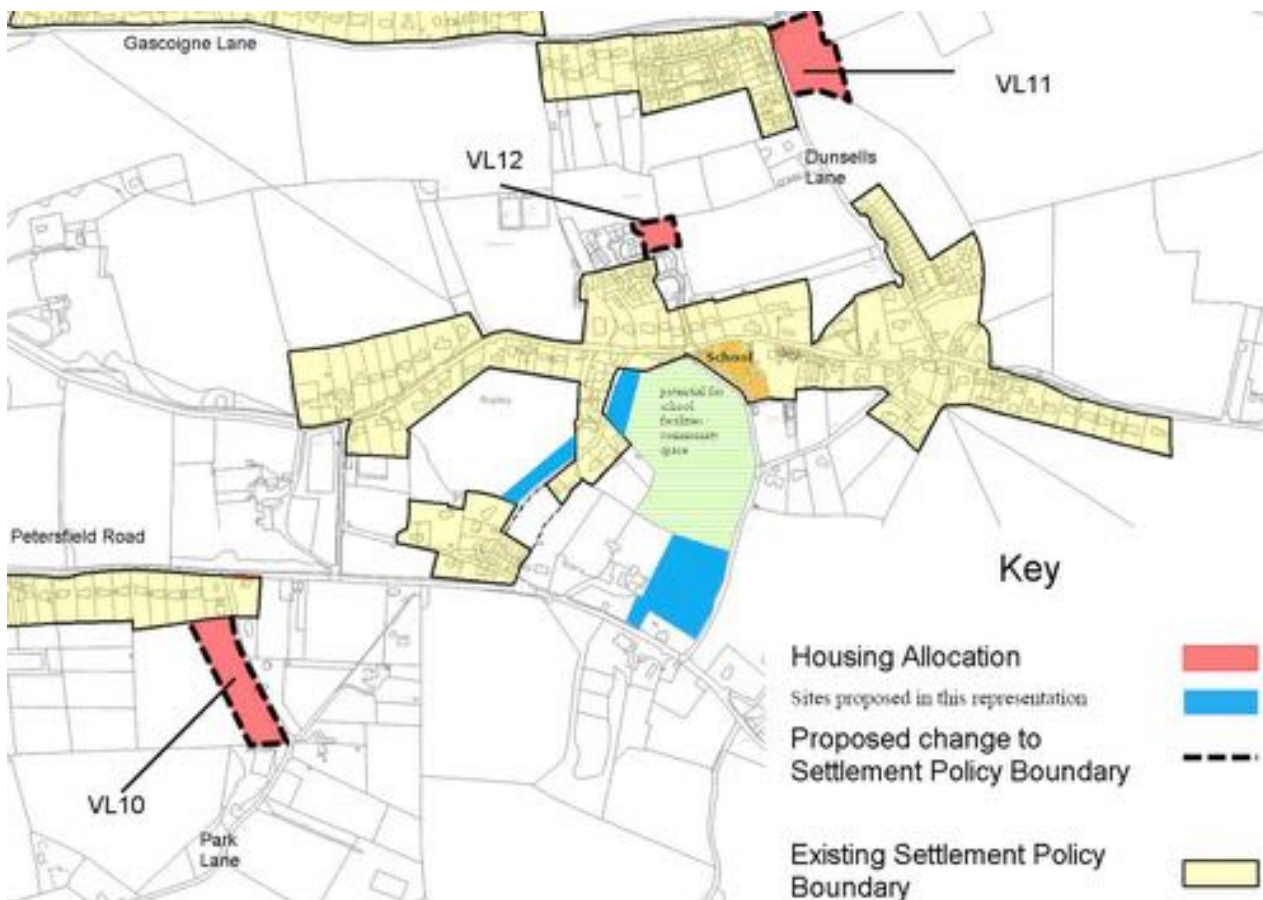
ROP008:

1. *'Rather than create unpopular, incongruous and visibly prominent housing developments, this field offers an ideal sustainable and central location for a modest number of small and desirable homes to fulfil the housing need. The vast majority of the green space is retained and could even be offered for community use. Ancient hedgerows are preserved by using a shared existing access.'*

ROP009:

2. *'Key Vista unaffected'*
3. *'Logical location for continued ribbon development in the centre of the village offering small affordable homes or bungalows for locals such as school teachers or downsizers. Single access to preserve hedgerows and green area to enhance nearby Forge'*
4. *'Majority of the large field next to the school will be offered to the village for community use'*
5. *'New homes here are shielded from view from across the field as the land slopes to the south. There is a wide and visible existing access from the main road; this is a perfect sustainable location for new housing and historic hedgerows are unaffected.'*

Additionally, please see an excerpt of the settlement boundary plan below, with the proposed development areas overlaid in blue, and the proposed community land hatched in green.



## Our ref: NPI00135

These plans demonstrate the following key points:

- Both sites are located directly adjacent to the existing designated settlement boundary as currently adopted.
- The proposed dwellings either side of Hammonds Lane itself are located along an established route within 'indents' of the settlement boundary; meaning that the expansion of the settlement boundary to accommodate development in this location would merely constitute infill and a logical continuation of both the built form in situ and development use class already in existence along Hammonds Lane. Indeed, this is the case for the amended settlement boundary expansion along the southeastern edge of Hammonds Lane as proposed by the emerging Local Plan under draft Policy S2, and the same pragmatic approach should apply to accommodate these proposed dwellings on the northwestern and northwestern edges of Hammonds Lane.
- All of these proposed dwellings would be located within close proximity to the central village hub; this is especially relevant when considered in the context of other fragments of the settlement, which are within the designated settlement boundary, yet in relative terms, are a significant distance from, and without such favourable accessibility and connectivity to, the village hub's local services and facilities.
- The modest cluster of dwellings proposed to be accessed off Petersfield Road lies comfortably within the parameters of the southernmost extents of the settlement boundary (stretching down as far as Ross Farm) and the easternmost extents of the settlement boundary (as far as Kimber House).
- Moreover, as with the proposed dwellings accessed off Hammonds Lane, those accessed off Petersfield Road would, again, read and be experienced within the existing context of residential use on either side of both Petersfield Road and Church Lane, and the extents of built form already developed in these areas, and would therefore be entirely in-keeping with the village character.

Draft Policy S2 states that:

*There is a presumption in favour of sustainable development within the SPB, which will be reviewed through the preparation of development plan documents and/or neighbourhood plans, reflecting the following general approach:*

- *Respecting the setting, form and character of the settlement;*
- *Avoiding actual or perceived coalescence of settlements; and*
- *Ensuring good accessibility to local services and facilities.*

From the analysis provided above it is abundantly clear that the proposed development of both sites would fulfil and be strongly in accordance with all three criteria listed above.

Draft Policy S2 continues to state:

*Development outside the settlements listed above is considered countryside and will be restricted to that which is appropriate in a rural area as set out in Policy NBE1.*

Draft Policy NBE1 defines the area that lies outside of the defined settlement policy boundaries as 'countryside'.

It is clear that the purpose of draft Policy NBE1 is intended to protect the 'rural context and setting' of the countryside.

However, this cannot be considered relevant in this context of land in the heart of a village. Furthermore, the change experienced in travelling along Hammonds Lane and Petersfield Road as a result of this proposed

## Our ref: NPI00135

development and its introduction of built form to these locations would be negligible, and not perceived as 'loss of countryside'. The proposed use class (C3) of new built form in these locations would be entirely compatible and complementary to the residential nature of development already in existence bounding both sides of these roads.

Notwithstanding this, the Policy provides support to development proposals within the countryside where they are:

- *providing **community facilities** close to an existing settlement which is accessible by sustainable transport modes*
- *proposals for **small scale informal recreation facilities** such as interpretation centres and car parks which enable people to enjoy the countryside*

This Policy support is relevant to the suite of benefits proposed to accompany the residential element of the development of these sites. A summary of the proposals is provided below.

### Proposed development of sites ROP008 & ROP009 (Land at Hammonds Lane, Ropley: 'The Hammonds Lane Development')

The proposed development will deliver **up to 15 much needed dwellings** to contribute to EHDC's acute housing need. Additionally, the proposed development will create new, dedicated areas of **landscaped public open space**, together with a **play area** and **more facilities for the school**, (including the option of extra parking) in the heart of the village, which will be located next to the primary school. The benefits of the proposals will be enjoyed by existing residents, as well as future generations.

The land pursuant to site ROP-009 in particular, is immediately adjacent to Ropley Church of England Primary School. Our Clients' proposals on this uniquely positioned site offer a truly bespoke opportunity to meaningfully deliver benefits for the school, village centre, and, as a result, the wider community:

- The school is an important long term community asset.
- Its continued sustainability needs to be supported wherever possible.
- With a collaborative approach between the school/education authority and the landowners the top north/eastern end of ROP-009 offers long-term potential for **new educational teaching facilities**.
- In principle, the landowners, with long standing local Ropley family connections, are receptive to and supportive of sensible initiatives that reinforce the **sustainability of the school** or dovetail with **other community led ideas**.

This information is presented in the Site Feasibility Plan prepared for ROP009 (for illustrative purposes only at this stage) and enclosed at Appendix 1.

The owners are willing to work flexibly and closely with the District and Parish Councils to ensure delivery of a scheme that enhances the character of the area and makes a valuable contribution to the housing stock of the village, together with public open spaces that will serve the community in a positive way for decades to come.

This proposal would align with the key aspirations of the Ropley Neighbourhood Development Plan (NDP Made 2019), which cites recognition that 82% of respondents felt some new housing should be planned for the next 15 years (Questionnaire dated 2015). NDP Policy RN11 also supports development proposals where they contribute positively to the public realm and the sense of place in their immediate locality, do not cause significant harm to amenities and produce appropriate scale and massing of development.

## **Summary**

Land at Hammonds Lane is the most sustainable location for new housing in Ropley. Both land parcels are located in the heart of the village and benefit from excellent accessibility. They will infill existing frontages within an established route in the centre of the village, and they will not lead to any encroachment of built form into the surrounding open countryside, nor cause any coalescence between settlements.

The proposal constitutes small scale housing development, to be sensitively designed in keeping with the local vernacular, and on sites which are technically unconstrained. For existing residents of Ropley, the provision of a greater variety in housing mix will provide the opportunity to stay in the village whilst ensuring their accommodation remains suitable for changing needs (i.e. first time buyers and / or downsizers). Additionally, new housing on these sites will bring new people into the village, and their associated disposable income will help to sustain the existing vitality of services such as the local shop and post office, as well as other local services. The children of prospective residents are likely to attend the local school, which will also help to secure its future. These factors will encourage sustainable local travel and lifestyles, directly aligning with EHDC's declaration of a climate emergency. New housing on the sites will be developed in a proportionate, sympathetic and unobtrusive manner, protecting existing vistas and aligning with the aspirations of Ropley's Neighbourhood Development Plan. New landscaping around the development areas will ensure that they will assimilate seamlessly into the fabric of the village and provide the village with biodiversity net gains for all to enjoy, in compliance with national policy and EHDC's declaration of an ecological emergency. Both sites adjoin the settlement boundary, from within it (strengthening the core of the village), rather than on its edges or beyond its outer limits (like many other alternative sites the council has considered and even permitted in recent years).

The sites are available, suitable for much needed local housing development and deliverable in the near future. The proposed development would help to meet the district's urgent housing need alongside the provision of a package of environmental, social and economic benefits to the village of Ropley, that would otherwise not be delivered.

**As such, we strongly recommend that the proposed amendment to the settlement boundary for Ropley is made in the emerging Local Plan for the modest expansion along these existing routes to accommodate up to 15 additional dwellings as a draft allocation for residential development, without delay.**

**Our ref: NPI00135**

## **Draft Policy H2: Housing Mix and Type**

This draft Policy states that Housing Needs have been assessed through the Housing and Employment Development Needs Assessment 2022 (HEDNA), and identifies that:

*Based on demographic trends, smaller homes are needed, with the largest share of demand for new market homes likely to come from households needing two and three-bedrooms homes.*

It requires proposed developments to address:

*a. need for smaller homes; and*

*b. requirements of an ageing population and people wishing to downsize, including the provision of single-storey dwellings.*

We strongly support the thrust of this draft policy. There is an urgent need in East Hants for more homes for smaller households of one and two persons, due to various factors including an aging population, affordability for first-time buyers and greater numbers of single occupancy households.

We consider that there is an urgent need for more homes in the 2-3 bedroom range, especially as starter homes for younger people. Increased provision of smaller homes will enable more first-time buyers to get onto the housing ladder. By providing significantly more smaller homes in East Hants, the ridiculously high affordability ratio of 12.7 times income will be meaningfully reduced (East Hants Updated Technical Note Sept 2023).

Increased provision of smaller homes will also enable more older people to “down-size”, moving out of 4–5-bedroom family homes and into more suitable, smaller homes.

Additionally, the provision of smaller homes in villages such as Ropley will also ensure that young buyers can afford to stay in rural communities; thereby enhancing the sustainability and vitality of East Hants’ villages.

To ensure the robust implementation of this policy, we recommend that the wording should include a requirement for at least 50% of all new homes on developments of 10 or more dwellings to have 3-bedrooms or fewer. This will ensure that at least half of new homes built in the district over the next 15 years or so are potentially affordable for first-time buyers and it will better facilitate down-sizing, which will, in turn, free up larger, family-sized homes, meaning that fewer family-sized homes will need to be built in the future.

### **Summary**

We strongly agree with the thrust of this draft policy and recommend that the wording is modified to require at least 50% of all new homes on major development of 10 or more dwellings to have 3 bedrooms or fewer.



### Draft Policy H3: Affordable Housing

This draft policy sets out the proposed requirements for developers to provide a proportion of affordable housing.

The HEDNA calculated the estimated annual need for affordable housing. It is concluded in the draft plan that developments increasing housing supply by 10 dwellings or more, or on sites over 0.5 hectares require at least '40% of the net number of dwellings as affordable housing'.

The proposed percentage of affordable housing as an overall target (40%) is consistent with that of the adopted Local Plan. Notwithstanding this, a review of East Hampshire's most recently published Annual Monitoring Report has identified that during the report year 2022-2023 an affordable housing delivery of just 30% of total completions was achieved.

Whilst we accept the approach to maintain the current requirement of 40%, we raise concern that this, alongside the prescribed tenure ratios introduced within this draft policy wording, has the potential to adversely impact housing delivery overall due to wider scheme viability implications. This is especially the case when considered in the context of previous performance shortfalls against this target and the new and additional policy requirements such as the mandatory (minimum 10%) provision of Biodiversity Net Gain on all applications for major development from 12 February 2024 onwards.

Indeed, potential viability constraints are recognised by the HEDNA which states "*...the amount of affordable housing delivered will be limited to the amount that can viably be provided. As noted previously, the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.*"

Accordingly, we request that this draft policy wording should be modified to include two caveats:

1. That where viability of a development is in question, the percentage of affordable housing on a site could be negotiated on a site-by-site basis.
2. That a financial contribution mechanism is available as an alternative to affordable housing provision, particularly for small sites in lower Tier settlements. This would allow affordable housing to be delivered in meaningful quantities to optimise the efficient management and maintenance of these properties by Registered Providers.

Additionally, Planning Practice Guidance on Affordable Housing (PPG Para 008) suggests "*The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes*". Consistent with our recommendation for draft Policy H1, we therefore suggest that an increase in housing supply in alignment with PPG could help to achieve a greater quantum of affordable housing delivery in East Hampshire overall.

### Summary

We consider that this draft policy wording should be modified to allow a financial contribution as an alternative mechanism to affordable housing provision, particularly for small village sites (i.e. Tiers 4 and 5).

It should also be modified to include a caveat to allow viability negotiations on a site-by-site basis, should the 40% affordable housing delivery target not be achievable. The requirement for affordable housing provision

**Our ref: NPI00135**

should be considered in the context alongside compliance with additional new policy requirements such as the delivery of Biodiversity Net Gain, to ensure that delivery of much needed new homes is not unreasonably impeded by viability considerations. An uplift in housing supply overall is also anticipated to assist with an increase in affordable housing delivery.

## **Recommendations**

In relation to housing strategy, the proposed mechanism of a percentage buffer for housing delivery targets above the standard method is welcomed to ensure that potential delays to the delivery of much needed new homes can be mitigated against. However, we consider that this percentage buffer should be increased, particularly owing to the Duty to Cooperate with neighbouring authorities on strategic housing issues. The extent of unmet need from neighbouring authorities should be established in order to accurately calculate the housing delivery figures proposed under draft Policy H1 and ensure the robustness and soundness of the emerging local plan.

We consider that a greater supply of housing is needed to support rural communities, and accordingly strongly **recommend the modification of the emerging Local Plan to allocate the land at Hammond Lane, Ropley, for residential development of up to 15 dwellings, without delay.** The sites are the most sustainable locations for new housing in Ropley. They are located in the heart of the village and are technically unconstrained. The sites are uniquely positioned to provide a bespoke opportunity for the ongoing prosperity of the school, village centre and community as a whole. They will infill areas within the centre of the village and offer an excellent opportunity to boost the supply of much needed new homes, in accordance with national guidance. Their sustainable location would also ensure a proportionate and sympathetic contribution to Ropley's continued vitality as a Tier 4 settlement and enhance its sustainability, in alignment with East Hampshire's Climate Emergency and carbon neutral initiatives.

In relation to housing mix, we support the thrust of this draft policy and recommend that the wording is modified to require at least 50% of all new homes on major development as smaller 2-3 bed properties, to boost and rebalance the available housing supply for first time buyers, down-sizers and single occupants.

In relation to affordable housing, we welcome the re-application of a 40% affordable housing requirement, subject to caveats relating to viability and financial contributions as an alternative mechanism to provision. This will allow the benefits of the current affordable housing delivery levels to be maintained, whilst ensuring that the viability of housing delivery is not unreasonably impeded when considered in the context of other new additional policy requirements, such as the delivery of Biodiversity Net Gain.

Our ref: NPI00135

# **Appendix 1: ROP009 Site Feasibility Plan** *(for illustrative purposes)*



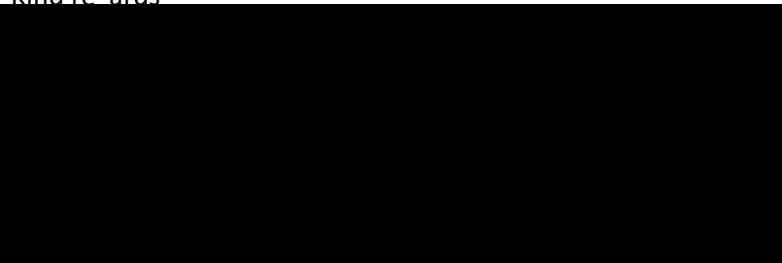
**From:** [REDACTED]  
**Sent:** 08 March 2024 16:42  
**To:** [EHDC - Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Savills obo Grainger Plc -EHDC Local Plan Regulation 18 Consultation - Land to the North of Woodcroft Farm representations  
**Attachments:** [638965 EHDC Regulation 18 March 2024 Land North of Woodcroft Farm .pdf](#)

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

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Please would you confirm receipt of this email.  
Kind regards



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# East Hampshire Local Plan 2021-2040 – Regulation 18

## Regulation 18

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Land North of Woodcroft Farm Phase 3







## Contents

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## 1. Introduction

- 1.1. These representations have been prepared on behalf of Grainger PLC in response to East Hampshire District Council's (EHDC) Local Plan Regulation 18 ('Our Local Plan 2021-2040', January 2024) consultation.
- 1.2. The Regulation 18 Local Plan consultation document provides details of the overall development and spatial strategy, in addition to draft site allocations and draft development management policies, for the East Hampshire District (excluding those areas in the District that fall within the South Downs National Park).
- 1.3. Grainger PLC acknowledges that this Regulation 18 consultation is not exclusive from those undertaken in 2019 & 2023, and that EHDC has considered previous comments and representations in its preparation. The remainder of these representations are structured as follows:
  - This introduction provides a short record of Grainger Plc's submissions in relation to Land to the North of Woodcroft Farm and details of previous engagement with stakeholders.
  - The second chapter provides an overview of the site and the potential development concept.
  - The third chapter responds to the background evidence base supporting this Regulation 18 consultation.
  - The fourth chapter responds directly to the Regulation 18 consultation document.

### Call for Sites Response – January 2023

- 1.4. Grainger PLC have responded to the Council's 'Call for Sites' and the previous Regulation 18 Part 1 consultation (January 2023) to promote the site for residential development as a sustainable extension to Land at Woodcroft Farm. Land at Woodcroft Farm has a draft allocation for 164 units within the EHDC Regulation 18 Our Local Plan 2021-2040

## 2. Overview of Site and Concept

- 2.1. The site being promoted is known as 'Land North of Woodcroft Farm' measures approximately 9.5ha land, currently used for grazing for horses. The site lies directly to the north of the site named 'Land at Woodcroft Farm' which is being promoted as a Phase 3 of the existing Catherington Park development, which is a development of 288 dwellings which are built out and occupied. Ancient Woodland known as James Copse is situated to the east of the site and a solar farm lies to the north. The site borders existing residential development and arable farmland to the west.
- 2.2. A Bridleway Open to All Traffic (BOAT) runs along the sites southern boundary. To the south of the BOAT is the proposed development site of 'Land of Woodcroft Farm' (site ref HDN1).
- 2.3. Land at Woodcroft Farm as been assessed by the Council as sustainable site suitable for residential development in the Council's published Sustainability Appraisal and the Council are proposing to allocate Land at Woodcroft Farm for residential development as set out in the Regulation 18 Local Plan (site ref: HDN1, January 2023) .
- 2.4. The site consists of open paddock land, with mature vegetation on the boundaries. There is a group of mature trees within the central area of the site. The site is deliverable and developable so will be available within the first part of the new Plan Period.

Figure 1: Site Location Plan



- 2.5. The settlements of Horndean and Waterlooville lie a short distance to the east and south respectively. The site also lies close to the existing residential development of Catherington Park to the south which is largely complete and occupied. Catherington Park is a 288 unit scheme approved in 2015 by Havant Borough Council (Ref: APP/13/00804), with development taking place in three distinct phases.
- 2.6. The land immediately to the south of the site is referred to as 'Land at Woodcroft Farm', which has been promoted for new homes through the emerging Local Plan and is recognised within the Regulation 18 Local Plan as a sustainable location for new homes through a draft allocation (site ref: HDN1). It is proposed that Land at Woodcroft Farm would form a 'Phase 3' of Catherington Park and designed to integrate new communities.
- 2.7. It is proposed for access to the site (Land North of Woodcroft Farm) to be provided via the proposed allocation to the south (as indicated on the attached concept plan at Appendix 1). This site will therefore form part of a cohesive, sustainable new neighbourhood in a location that has been identified as a sustainable location for new homes.
- 2.8. The site is deliverable and developable, in accordance with the definitions set out within the National Planning Policy Framework (NPPF). Site assessments have identified that there are no significant constraints to residential development on this site. Significantly:
- The site lies within Flood Zone 1
  - The site is outside of the South Downs National Park designation
  - The site is not within a Conservation Area nor adjacent to any listed buildings
  - There are no SINCs, SSSIs or local wildlife sites within the boundary
  - The site itself is clear of any specific landscape designations (e.g. ancient woodland, registered park and gardens)
- 2.9. To demonstrate the level of assessment that has been undertaken at this stage by Grainger's appointed technical specialists and to inform the Council's consideration of the site for new homes, a constraints and opportunities plan has been produced (see appendix 1). Grainger Plc Supports the Council's assessment that the site could potentially be capable of delivering up to 164 dwellings.
- 2.10. Taking reference from the scheme approved to the south by Havant Borough Council at Catherington Park and with consideration to the character of the wider area, the site capacity has been formed on the premise that the predominate form of development would comprise dwelling houses, to meet housing mix requirements. A range of house types and sizes will be achievable within the site, however the characteristics of the site especially suit the development of 2 and 3 bedroom units which are identified as particularly in demand within the Council's Housing Economics Needs Assessment (2022).

### Transport and Access

- 2.11. It is possible for vehicular access to be provided via Land at Woodcroft Farm to the south (refer to Appendix 1), and this would be specifically designed to accommodate the level of traffic and trip rates anticipated from the site. It is anticipated that this access would also provide cycle and pedestrian connectivity. Additional connections to the existing PRow network to the north and south of the site would also be achievable and would assist with ensuring that the development would be well-integrated with the

settlement of Horndean. An initial assessment has been undertaken by Grainger's appointed Highways consultants and this is appended to these representations (Appendix 2).

- 2.12. The site lies in relatively close proximity to the Wecock Village and Lovedean Local centres that offer a range of shops and community facilities. Bus stops on Eagle Avenue, provide direct links to supermarkets, Havant bus and rail stations and Portsmouth and Southsea. There are two primary schools within 1km of the site (Woodcroft Primary School and Rachel Madocks School), whilst Cowplain Community School (secondary) lies to the south off Hart Plain Avenue.
- 2.13. With regards to car parking there is sufficient space within the site to meet EHDC residential parking standards and it is anticipated this would include a mix of on plot and off plot parking spaces.
- 2.14. The site therefore represents a sustainable location that is close to local services and facilities, meaning occupants would not have to rely on vehicles to access these. Together with neighbouring Land at Woodcroft Farm, the site would assist with forming a sustainable and cohesive addition to the settlement of Horndean in accordance with Paragraph 11 of the NPPF that states that all plans should promote a sustainable pattern of development.

### Ecology

- 2.15. An ecological appraisal has been undertaken to establish an ecological baseline for the site and to determine potential Important Ecological Features (IEF) that could be impacted by future development.
- 2.16. The proposed development site comprises an area of poor semi-improved grassland with mature tree lines. The site is located adjacent to two non-statutory designated sites, James Copse and Outlier SINC to the east and James Paddock SINC to the north.
- 2.17. The report identifies that the development of the site would require appropriate mitigation in relation to the loss of priority woodland and hedgerow habits and protected species including foraging badgers, bat species, breeding birds and reptiles. Mitigation will also be necessary in relation to the loss of semi-improved grassland, priority woodland and hedgerow habitat.
- 2.18. The conclusions and recommendations set out within the report will inform future development considerations. Grainger is committed to promoting a development that fully considers all environmental and ecological constraints relevant to the site and understands the requirements for ensuring the provision of Biodiversity Net Gain and meeting Nutrient Neutrality requirements for any development.

### Ancient Woodland

- 2.19. James's Copse to the east of the site is designated ancient woodland. The site can be developed in a way that protects the Ancient Woodland and there is scope to introduce suitable buffers in accordance with Natural England guidance as required as shown on the opportunities and constraints plan at Appendix 1.

### Summary of Benefits of Development at Land to the North of Woodcroft Farm

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

**Table 1: The principal benefits of development at Land North of Woodcroft Farm**

<b>Economic Role</b>	<ul style="list-style-type: none"><li>▪ Promoting the creation of a cohesive development (along with Land at Woodcroft Farm which is subject to a draft allocation within the Regulation 18 Local Plan) which can form a sustainable addition to the settlement of Horndean.</li><li>▪ a readily developable site which will be available within the early stages of the Local Plan period;</li><li>▪ inherent economic value brought about by development/construction and through supporting local services/facilities at the operational stage.</li></ul>
<b>Social Role</b>	<ul style="list-style-type: none"><li>▪ A site that can deliver a suitable mix of housing including the provision of 2 and 3 bed properties that meets identified local housing needs.</li><li>▪ the site can provide a high-quality development that benefits the physical and mental health of future occupiers through providing a verdant and spacious living environment;</li></ul>
<b>Environmental Role</b>	<ul style="list-style-type: none"><li>▪ Promoting a landscape-led approach including landscape buffers and provision of semi-natural greenspaces;</li><li>▪ ecological enhancement (of at least the statutory requirement of 10% BNG);</li><li>▪ a site that encourages access to services and amenities by sustainable means.</li></ul>



### 3. Response to the Evidence Base Supporting Regulation 18 Consultation

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

- 3.1. Grainger PLC endorses the promotion of Horndean from a tier 3 to tier 2 settlement within the Regulation 18 Local Plan. It is considered that this revised assessment recognises the range of services and amenities contained within the settlement, in addition to acknowledging the settlement’s proximity to wider services that can be accessed within the adjacent settlement of Waterlooville.
- 3.2. Grainger PLC proposes that the settlement boundary for Horndean is revised to encompass Land North of Woodcroft in order to promote the addition of site that can deliver a landscape-led, sustainable development.

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

- 3.3. Land North of Woodcroft Farm is given the reference HD-043 within the Site Allocations Options, High-Level Assessment Score Summaries. The assessment criteria scores the scheme against a range of twelve objectives that span the three pillars of sustainability. We provide commentary as follows:

**Table 2: Grainger Plc Response to EHDC IIA Assessment for Land to the North of Woodcroft Farm**

IAA Objective	Score	Response to IIA Score
To protect, enhance and restore biodiversity and geodiversity across the East Hampshire planning area	Mixed effect	The site is scored as having a mixed effect on account of the proximity to an area of ancient woodland and a number of priority habitats. Grainger PLC commissioned an ecological appraisal which identifies that ecological mitigation will be required should the site be developed. Suitable buffers to the site perimeters, including the ancient woodland to the east of the site, can be delivered to ensure that ecological commuting corridors are conserved and enhanced should the site be developed in the future.  <b>Grainger PLC acknowledges the score provided, however considers that overall, ecology on the site can be conserved and enhanced.</b>
To minimise carbon emissions and contribute to achieving net zero carbon emissions in the East Hampshire planning area	Strong positive effect	The score acknowledges the sustainability credentials of the site.  <b>Grainger PLC supports this assessment.</b>
To promote adaptation and resilience to climate change	Neutral effect	The score acknowledges that the site falls within Flood Zone 1 but also that it contains limited areas that maybe vulnerable to surface water flooding. The extent of the site identified as at risk of surface water flooding within the Council’s Strategic Flood Risk Assessment is limited. It is considered that future schemes can be designed to avoid areas at risk of surface water flooding.



# East Hampshire Local Plan 2021-2040 – Regulation 18

## Land North of Woodcroft Farm Phase 3



IAA Objective	Score	Response to IIA Score
		<b>Grainger PLC acknowledges that the site has areas identified of potentially being at risk of surface water flooding but considers that these risks can be comprehensively managed within the site through appropriate design measures, including the incorporation of SuDs.</b>
To promote accessibility and create well-integrated communities	Minor negative effect	Grainger PLC considers that the site has the potential to form a logical and well-integrated development that could come forward simultaneously with Land at Woodcroft Farm to form a sustainable and well-integrated community.  <b>Grainger considers that the site should be scored as having a positive effect against this criterion, as it has the potential to provide a cohesive development, along with Land at Woodcroft Farm to the south. Combined the sites can provide a sustainable and landscape-led addition to the settlement of Horndean.</b>
To actively promote health and wellbeing across East Hampshire and create safe communities free from crime	Mixed effect	The site can provide enhanced access to the PRoW network, in addition to generous quantum of public open space.  <b>Grainger PLC considers that the site should score positively against this criterion.</b>
To strengthen the local economy and provide accessible Jobs and skills development opportunities for local residents	Minor positive effect	The site is well-located relative to existing employment opportunities situated within the settlements of Horndean and Waterlooville.  <b>Grainger PLC support the positive assessment of the site against this criterion.</b>
To protect and enhance built and cultural heritage assets in the East Hampshire planning area	Uncertain effect	There is intervening residential development between the site and the heritage assets which are allocated a significant distance to the north-east and east. Accordingly, it is considered that the site can be developed without any adverse impact upon heritage assets.  <b>Grainger consider that the site should be scored as having a neutral effect on heritage assets.</b>
To provide good quality and sustainable housing for all	Strong positive effect	<b>Grainger PLC supports the assessment of the site against this criterion.</b>
To conserve and enhance the character of the landscape and townscape	Mixed effect	The score acknowledges that the site is located within 2km of the South Downs National Park. The site is capable of delivering a landscape-led development that does not have a significant adverse impact upon the local landscape character. This can be achieved through developing at an appropriate density, use sympathetic roof heights and forms, and the incorporation of landscape buffers.  <b>Grainger PLC considers, for the reasons set out above, that the site should be scored as having a neutral effect, when reviewing the site against this criterion.</b>
To support efficient and the sustainable use of East Hampshire's natural resources	Strong adverse effect	The site is not part of an agricultural unit that is actively farmed. Additionally Grainger PLC consider that any future development can be adequately managed without harm to the SPZ.  <b>Grainger PLC considers, for the reasons set out above, that the site should be scored as having a minor adverse effect.</b>
To achieve sustainable water resource management and	Minor adverse effect	Grainger PLC considers that any impact from future development can be adequately managed without harm to the SPZ.

# East Hampshire Local Plan 2021-2040 – Regulation 18

## Land North of Woodcroft Farm Phase 3



IAA Objective	Score	Response to IIA Score
protect and improve water quality in the East Hampshire planning area		<b>Grainger PLC considers, for the reasons set out above, that the site should be scored as having a lesser adverse effect than that given.</b>
To minimise air, noise and light pollution in the East Hampshire planning area	Neutral effect	<b>Grainger PLC acknowledges this assessment.</b>



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

### Overall response to Draft Local Plan

4.1. This section sets out Grainger’s principal comments on the policies contained within the Draft Local Plan. Grainger PLC’s position on specific policies contained within the Local Plan is summarised in the below table

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

Policy S1: Spatial Strategy	Support, but with modifications
Policy S2: Settlement Hierarchy	Support, but with modifications
Policy H1: Housing Strategy	Support, but with modifications
Policy H2: Housing Mix and Type	Support

### Policy S1: Spatial Strategy

- 4.2. Grainger PLC supports this policy in principle and welcomes the reference at paragraph 3.6 of the document that the standard methodology will be used to generate a minimum housing number for the district. This is identified as 9,082 units over the plan period (excluding those areas of the District that fall within the South Downs National Park) or 478 units per annum.
- 4.3. Paragraph 3.8 of the plan comments that the total unmet needs of neighbouring authorities is unknown. The Partnership for South Hampshire, of which EHDC is a member, identifies an unmet need of approximately 12,000 homes within the South Hampshire area by 2036 (PfSH Spatial Position Statement, Paragraph 3.10, December 2023). Grainger PLC consider that there is the opportunity for EDHC to allocate further housing sites, such as Land to the North of Woodcroft Farm to bolster their housing supply and assist in meeting a proportionate level of unmet need within their administrative area.
- 4.4. It is noted that the Council consider that 1,320 dwellings will come forward through windfall sites during the duration of the Local Plan (paragraph 3.25). Given the historic delivery provided by windfall sites within the district, Grainger PLC consider that it would be prudent to allocate a sites that are assessed to be developable and in sustainable locations in order to bolster their housing land supply to meet local needs over the plan period and place lesser reliance on windfall sites This would also assist EHDC in achieving positive, plan-led development over the plan period in accordance with paragraph 16 of the NPPF.

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

EHDC should allocate sites assessed as developable and sustainable in order to bolster planned housing supply over the plan period and reduce the reliance is placed upon windfall sites and ensure that the housing needs of the District can be positively planned for.

### Policy S2: Settlement Hierarchy

- 4.5. Grainger PLC supports the classification of Horndean as a tier 2 settlement. This classification is reflective of the range of services and amenities contained within the settlement, in addition to acknowledging the settlement's proximity to wider services that can be readily accessed within the adjacent settlement of Waterlooville.
- 4.6. Grainger PLC supports the inclusion of Land at Woodcroft Farm within the Settlement Policy Boundary for Horndean, as illustrated on the associated settlement policies map. The presumption in favour of sustainable development within the Settlement Policy Boundary is noted.
- 4.7. Grainger PLC consider that Land North of Woodcroft Farm provides the opportunity to create a landscape-led residential development that provides a high-quality living environment for future occupiers. Grainger's aspiration is to create a layout which responds to and enhances the site's ecological characteristics, creating a strong sense of identity and allowing the surrounding nature and landscape to form an integral part of the new neighbourhood at Woodcroft Farm. Additionally, allocating Land to the North of Woodcroft Farm would reinforce the spatial strategy set out in policy S2; providing housing adjacent to a tier 2 settlement.
- 4.8. The site represents a sustainable location that is close to local services and facilities, meaning occupants would not have to rely on vehicles to access these. Accordingly, Grainger PLC considers that the Settlement Boundary Policies map associated with Land at Woodcroft Farm should be amended to include Land North of Woodcroft Farm.

### Modification to Settlement Policies Boundary Proposed by Grainger

EHDC should allocate Land North of Woodcroft Farm to assist with meeting the housing needs of the District in a sustainable manner. Specifically, the site, in conjunction with Land at Woodcroft Farm, has the potential to form a landscape-led, high-quality development that will form a logical and cohesive addition to the settlement of Horndean.

### Policy H1: Housing Strategy

- 4.9. Grainger PLC supports the hierarchical approach to allocating housing in accordance with the settlement tiers.
- 4.10. For the reasons set out in the response to Policy S1, Grainger PLC considers that EHDC should consider planning for a greater quantum of housing than the 3,500 units identified within this policy.
- 4.11. Paragraph 3.8 of the plan comments that the total unmet needs of neighbouring authorities is unknown. The Partnership for South Hampshire, of which EHDC is a member, identifies an unmet need of approximately 12,000 homes within the South Hampshire area by 2036 (PfSH Spatial Position Statement, Paragraph 3.10, December 2023). Grainger PLC consider that there is the opportunity for EDHC to allocate further housing sites, such as Land to the North of Woodcroft Farm to bolster their housing supply and assist in meeting a proportionate level of unmet need within their administrative area.
- 4.12. It is noted that the Council considers that 1,320 dwellings will come forward through windfall sites during the duration of the Local Plan (paragraph 3.25). Given the historic delivery provided by windfall sites within the district, Grainger PLC considers that it would be prudent to allocate a sites that are assessed to be developable and in sustainable locations in order to bolster their housing land supply to meet local needs over the plan period and place lesser reliance on windfall sites This would also assist EHDC in achieving positive, plan-led development over the plan period in accordance with paragraph 16 of the NPPF.

### Modifications to Policy H1 Proposed by Grainger PLC

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

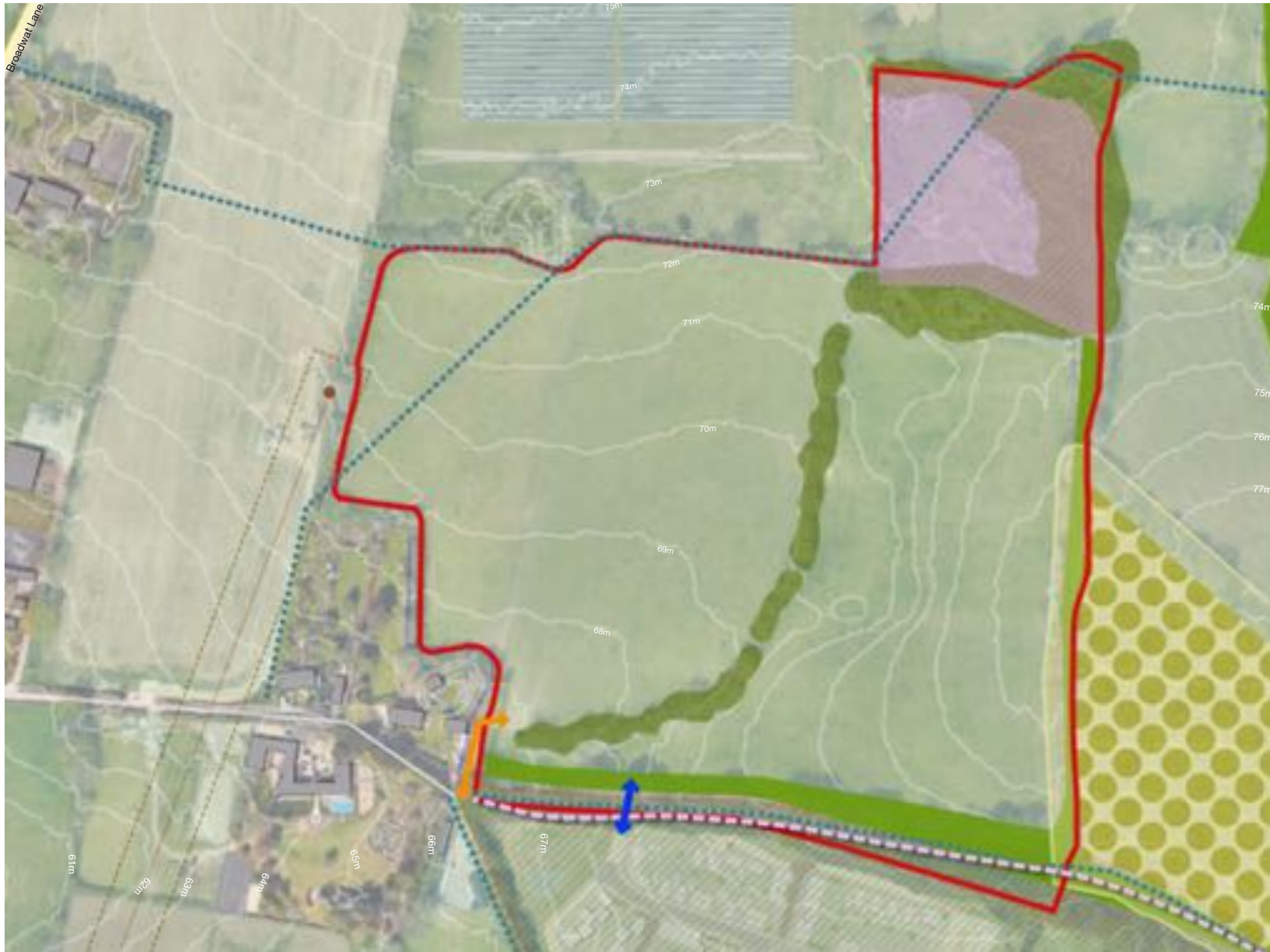
### Policy H2: Housing Mix and Type




















- 4.13. Grainger PLC notes that the proposed requirement to ensure a range of house types, tenures and sizes are provided.
- 4.14. Grainger PLC considers that Land to the North of Woodcroft Farm is suitable for delivering a range of units sizes across a full spectrum of housing tenures.

## 5. Conclusions

- 5.1. This representation has been prepared on behalf of Grainger PLC in response to the East Hampshire Local Plan Regulation 18 Consultation. In submitting these representations, Grainger PLC wishes to support the preparation of a new Local Plan that positively plans for the delivery of housing in sustainable locations.
- 5.2. Grainger PLC considers that Land North of Woodcroft Farm provides the opportunity to create a residential development that provides a high-quality living environment for future occupiers. Grainger's aspiration is to create a layout which responds to and enhances the site's ecological characteristics, creating a strong sense of identity and allowing the surrounding nature and landscape to form an integral part of the new neighbourhood at Woodcroft Farm.
- 5.3. Grainger considers that EHDC should allocate Land north of Woodcroft Farm to assist with meeting the housing needs of the District in a sustainable manner. Specifically, the site, in conjunction with Land at Woodcroft Farm, has the potential to form a landscape-led, high-quality development that will form a logical and cohesive addition to the settlement of Horndean.
- 5.4. Should the site be considered favourable for future development, continued promotion of the site would be carried out alongside the larger development of Land at Woodcroft Farm.
- 5.5. Grainger wishes to be kept informed as work on the draft plan progresses to Submission version stage, and would welcome a meeting with EHDC officers to discuss any of the comments made in these representations.





-  Site Boundary
-  Existing Buildings
-  Minor Road
-  A Road
-  PRoW
-  Minor Lane
-  Ancient Woodland
-  15m Buffer From The Ancient Woodland
-  Good Quality Semi-improved Grassland
-  Existing tree
-  Deciduous Woodland
-  Overhead Power Line
-  Pylon
-  15m Buffer to Electricity Transmission Line
-  Byway Open to All Traffic (BOAT)
-  Contours
-  Existing Access into Site
-  Potential Access into Site
-  Land North of Woodcroft Farm (draft allocation for 170-180 dwellings in the East Hampshire District Council (EHDC) Draft Local Plan 2017-2036)

## Land to the North

on behalf of Grainger

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drawing no.	AP01	drawing	Opportunities and Constraints Plan
revision	A(06.03.2024)	scale	1:2000 @A3
drawn by	YH/AM/AIL	checked by	WP
date	12.10.2022	job no.	612668

Urban  
Design  
Studio

