

From: [REDACTED]
Sent: 07 March 2024 10:54
To: [EHDC - Local Plan](#)
Subject: Regulation 18 Draft Local Plan Consultation Response - General Representations on behalf of Thakeham Homes
Attachments: [2024 03 04 EHDC Reg 18 Draft Local Plan Consultation - General Representations for Thakeham Homes \(1\).pdf](#)

Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Consultation Responses

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Dear Sir or Madam,

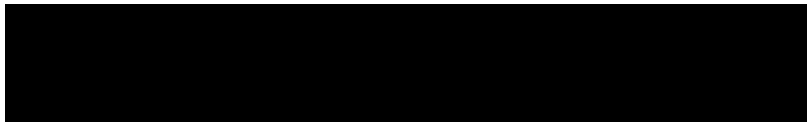
East Hampshire Local Plan 2040 Draft Plan Consultation Representations on behalf of Thakeham Homes

I am writing with regard to the above consultation to provide written representations on the policies within the Regulation 18 Draft Plan, submitted on behalf of Thakeham Homes.

Thakeham has also submitted separate representations on three sites that we control, which these representations should be read in conjunction with.

I trust that these representations will be useful and would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

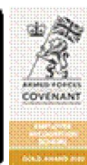
Regards,



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www.thakeham.com



THAKEHAM



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From: [REDACTED]
Sent: 04 March 2024 14:29
To: [EHDC - Local Plan](#)
Subject: Regulation 18 Draft Local Plan Consultation Response - Land North of Alton Lane, Four Marks
Attachments: [EHDC Reg 18 Draft Plan - North of Alton Lane, Four Marks Thakeham - Written Reps.pdf](#)
[EHDC Reg 18 Draft Plan - North of Alton Lane, Four Marks Thakeham - Appendix 2.pdf](#)

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Dear Sir or Madam,

**East Hampshire Local Plan 2040 Draft Plan Consultation
Representations on behalf of Thakeham Homes
Land north of Alton Lane, Four Marks**

I am writing with regard to the above consultation to provide written representations, provided on the attached letter and the appended Vision Document with regard for Thakeham Homes site at Land north of Alton Lane, Four Marks.

Please ensure that these representations are read alongside our general representation on wider Regulation 18 Draft Plan aspects, which are appended to the letter and have also been submitted under separate cover.

I trust that these representations will be useful and would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Regards,



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From: [REDACTED]
Sent: 04 March 2024 14:28
To: [EHDC - Local Plan](#)
Subject: Regulation 18 Draft Local Plan Consultation Response - Land west of Telegraph Lane and south of Alton Lane, Four Marks
Attachments: [EHDC Reg 18 Draft Plan - Telegraph Lane, Four Marks Thakeham Written Reps.pdf](#)
[EHDC Reg 18 Draft Plan - Telegraph Lane, Four Marks Thakeham Appendix 2 - Vision Document.pdf](#)

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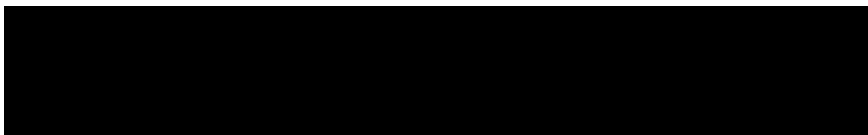
**East Hampshire Local Plan 2040 Draft Plan Consultation
Representations on behalf of Thakeham Homes
Land west of Telegraph Lane and south of Alton Lane, Four Marks**

I am writing with regard to the above consultation to provide written representations, provided on the attached letter and the appended Vision Document with regard for Thakeham Homes site at Land west of Telegraph Lane and south of Alton Lane, Four Marks.

Please ensure that these representations are read alongside our general representation on wider Regulation 18 Draft Plan aspects, which have been appended to the letter and also submitted under separate cover.

I trust that these representations will be useful and would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Regards,



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From: [REDACTED]
Sent: 04 March 2024 14:15
To: [EHDC - Local Plan](#)
Subject: Regulation 18 Draft Local Plan Consultation Response - Land South of Five Heads Road, Horndean
Attachments: [EHDC Reg 18 Draft Plan - Horndean Thakeham Written Response.pdf](#)
[EHDC Reg 18 Draft Plan - Horndean Thakeham Appendix 2 - Vision Document.pdf](#)

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Dear Sir or Madam,

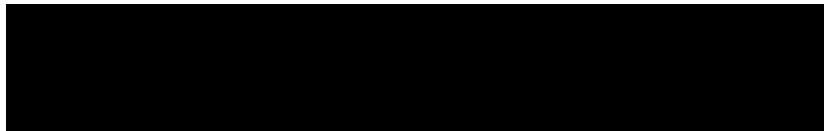
**East Hampshire Local Plan 2040 Draft Plan Consultation
Representations on behalf of Thakeham Homes
Land south of Five Heads Road, Horndean**

I am writing with regard to the above consultation to provide written representations, provided on the attached letter and the appended Vision Document with regard for Thakeham Homes site at Five Heads Road, Horndean.

Please ensure that these representations are read alongside our general representation on wider Regulation 18 Draft Plan aspects, which have been submitted under separate cover.

I trust that these representations will be useful and would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Regards,



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THAKEHAM

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

4 March 2024

Dear Sir / Madam,

East Hampshire Local Plan 2021 – 2040: Regulation 18 Draft Local Plan Consultation Thakeham Homes General Representations

Introduction

Thakeham Homes Limited ('Thakeham') is writing in respect of the East Hampshire Regulation 18 Draft Local Plan Consultation ('Reg 18 Draft') prepared by East Hampshire District Council ('EHDC').

Overall, Thakeham is supportive of the aspirations of the Regulation 18 Draft Local Plan, particularly the Council's sustainability aspirations, around net zero carbon, Biodiversity Net Gain and the creation of sustainable communities; which are wholly aligned with Thakeham's values. Furthermore, we support the inclusion of the residential allocation for Land south of Five Heads Road, Horndean (Site Allocation HDN2) for 118 homes

However, there are some policies that require amendment to ensure deliverability of the Plan's objectives, crucially delivering against housing needs. Thakeham agrees with the Council's calculation of the Standard Method, which is 578 dwellings per annum (dpa) or 10,982 over the Plan Period. We also appreciate the difficulties arising within National Parks. However, it is unlikely that the South Downs National Park Authority will be able to meet its own housing needs given the level of protection for National Parks, we therefore submit that the Plan underestimates the level of residual unmet need and the contribution that is made towards this unmet need should be higher.

We submit in light of the above, EHDC should allocate further sites for residential use, and Thakeham respectfully asks EHDC to reconsider the assessments of the following suitable/available/achievable and deliverable sites:

- Land north of Alton Lane, Four Marks – c.90 homes
- Land south of Telegraph Lane and east of Alton Lane, Four Marks – c.10 homes

Individual representations are made in relation to each of these sites, including a Vision Document for each, demonstrating how these sites could be brought forwards to meet both local and district housing needs.

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Response to consultation

Thakeham has reviewed the consultation documents and provides comments on the relevant policies below. However, the first point to note is the proposed timescales to adoption of this Local Plan at Figure 1.4 of the consultation document, which suggest the Council can have an adopted Plan by Summer 2025, some 15 months from now.

Whilst Thakeham supports the Council's willingness to push forwards to an adoption, we believe the timescales are overly optimistic. We therefore set out anticipated timescales for each stage as well as an updated timetable below:

- Consideration of responses to Reg 18 Draft Plan consultation (6 months);
- Preparation and Council sign-off of Reg 19 consultation (3 months);
- Reg 19 consultation (1.5 months);
- Consideration or responses to Reg 19 consultation and prep of submission (3 months);
- Submit Plan to SoS (1 day);
- PINS prep time and average time from submission to EiP (6 months);
- Examination in Public (1 month);
- Inspector considers interim advice after EiP (0.5 months);
- Main Modifications prep and consultation (6 months);
- Inspectors Final Report (1 month);
- Council sign-off and adoption of Local Plan (1 month).

In light of the above, the process from this stage is still likely to take 30 months, which would suggest a more realistic timetable of:

- November-December 2024 – Public consultation on Reg 19 Submission Plan
- March 2025 – Submit Local Plan for Examination
- September-October 2025 – Examination in Public
- June/July 2026 – Planning Inspector's Report
- September 2026 – Adopt the Local Plan

Policy S1 'Spatial Strategy'

Draft Policy S1 outlines the spatial strategy for the Local Plan over the period 2021-2040, with aims to deliver a total of 9,082 new homes at 478 dwellings per annum. In light of the comments above, about the Plan taking a year longer to reach adoption, we would recommend the Local plan period is extended to run 2021-2041 to account for the additional time.

Thakeham notes that the total housing numbers proposed over the plan period do not account for meeting any unmet need from other LPA areas other than the South Downs National Park (SDNP). Furthermore, the Plan makes an assumption based on the likely unmet need arising from the National Park. It is likely that there will be a need for higher housing numbers than suggested and suggest that ongoing liaison with the South Downs National Park Authority, who are also undertaking a review of their Local Plan, would quantify the level of unmet need which would need to be accommodated by EHDC.

In addition to the above, Paragraph 9.18 of Policy H1 'Housing Strategy' states that *“there needs to be some allowance for flexibility and to allow for sites allocated not coming forward during the Plan Period. Therefore, sites capable of supplying a further 10-15% should be allocated to create a buffer”*.

Assuming the 9,082 dwelling requirement is correct, this would require a total provision of between 9,990 homes (10%) and 10,444 homes (15%) across the plan period. Considering the current supply of 6,225 dwellings this would require the allocation of between 3,765 and 4,219 dwellings in new allocations. However, the Council is only proposing to allocation sites for 3,443 dwellings, which would result in a shortfall of between 322 and 776 dwellings across the plan period.

To ensure the Plan is as robust as possible when considered at Examination, we recommend additional sites are identified to address the shortfall.

Policy S2 'Settlement Hierarchy'

Thakeham supports the identification of a settlement hierarchy as the focus for development within the settlements, this ensures that development is directed to the most sustainable locations. The policy also suggests all settlements have a Settlement Policy Boundary, with proposed amendments to the boundary to reflect development.

We support this position with regards the proposed Tier 1 and Tier 2 settlements. However, we note that the Four Marks settlement boundary does not extend to the existing housing down Telegraph Lane, nor does it include any of the housing along Alton Lane, despite these forming part of the built form of Four Marks, both on plan and on the ground. It is therefore recommended that the settlement boundary for Four marks is re-drawn to extend down Telegraph Lane and along Alton Lane.

Furthermore, we note that Four Marks has been demoted to a Tier 3 settlement when it was previously considered a Tier 2 settlement in the previous local plan, there is no justification for this. Given Four Marks includes all the main services, such as shops, restaurants, pubs, healthcare and community facilities, schools and sports clubs, this settlement provides significant services for a wider area and should therefore be retained as a Tier 2 settlement.

Policy CLIM 1 'Tackling the Climate Emergency'

Thakeham is committed to helping to tackle the climate emergency through sustainable construction, net zero carbon homes, delivering in excess of Government mandated 10% biodiversity net gain and reducing water consumption. Indeed, Thakeham was the UK's first housebuilder to sign the SME Climate Commitment, joining the UN's Race To Zero campaign. Accordingly, we are fully supportive of the Council's ambitions to tackle the climate emergency.

However, we note CLIM1.1 appears to be an aspiration rather than specific policy. It is therefore recommended that this paragraph is removed from the policy wording.

Policy CLIM 2 ‘Net Zero Carbon Development: Operational Carbon’

Thakeham supports the approach to seeking net zero carbon and net zero carbon ready homes and is proposing to build these types of development across our sites in East Hampshire.

It is advised that the Council should provide a margin of error to enable flexibility to the estimates for the development’s whole life cycle highlighted in draft policy CLIM3.2.

It is noted that the Council has not provided definition and clarity to “*the risks associated with a changing climate*” as stated in draft policy CLIM5.1, we therefore recommend that the Council provides further specification detail of all of the anticipated risks as a list in bullet point form under the sub-policy in order to avoid confusion.

While these policies demonstrate a commendable commitment to addressing climate change, it is essential to balance environmental objectives with the economic viability of housing developments. We would advocate for ongoing discussions with the Council to strike a balance that supports sustainable practices while maintaining the feasibility of housing development.

Natural and Built Environment

Thakeham places great importance on protecting the natural environment and this is demonstrated in our portfolio of landscape-led developments which prioritises green and blue infrastructure, delivering net biodiversity gain and support local wildlife.

Policy NBE2 and NBE3 ‘Biodiversity’

Draft policy NBE2 and NBE3 together outline a set of criteria which only permits development proposals where it can be demonstrated that there would be no adverse impact on designated wildlife sites, protection and enhancement of priority species and priority habitats, achievement of at least 10% biodiversity net gain. This aligns with Thakeham’s sustainability commitments and we consider that there is the potential for all development to aspire to providing in addition of the 10% BNG required in the Environment Act 2021.

Policy NBE4 to NBE6 ‘Nutrient Neutrality’

Thakeham recognises that nutrient neutrality is a widespread issue across the UK and East Hampshire is one of the many authorities which are affected by this. Draft policy NBE6 and NBE9 sets out mitigation methods which may include a financial contribution, a developer-provided package of measures to avoid or mitigate effects on the SPAs, or a combination of both. We acknowledge that EHDC has produced the ‘East Hampshire position statement and mitigation plan’ to assist with planning applications and therefore recommend the Council to consider providing reference to this mitigation plan within the policy to ensure consistency.

Policy NBE7 ‘Managing Flood risk’

We consider that draft policy NBE7 sets out a systematic approach to flood risk assessment and management within housing development and are thus in support of this policy. Thakeham

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welcomes the inclusion of policy NBE7.4 which recognises the multiple functions SuDs features have for amenity, open space and biodiversity.

Policy NBE8 ‘Water quality, supply and efficiency’

Thakeham supports the desire to reduce water consumption as set out in policy NBE8.4 by stipulating a standard of no more than 95 litres per person per day. Thakeham welcomes the acknowledgement that seeking to achieve this may have impacts on scheme deliverability and should therefore be considered holistically alongside other requirements and considered on a site by site basis.

Policy NBE10 ‘Landscape’

In Thakeham’s portfolio of proposals, we have consistently strived for clear emphasis on conserving and enhancing the special characteristics and visual amenity of local landscapes. While this has previously posed some challenges, particularly on suitable sites with complex topography, Thakeham has consulted with the relevant stakeholders and landscape consultants to create aesthetically pleasing and environmentally sensitive projects that align with the community’s values. This draft policy NBE10 encourages developers to adopt a landscape-led approach, which we support and are committed to pursuing.

Policy NBE11 ‘Gaps between settlements’

Thakeham supports the Council’s objective of preserving the distinctive characteristics individual towns and villages each have their own unique characteristics and that their separate identity is maintained. However, we would suggest gaps between settlements is subjective and a more appropriate way of achieving individuality of settlements would be through a policy that seeks the protection of settlements from coalescence.

Policy NDE12 ‘Green and Blue Infrastructure’

Thakeham supports the objective and policy direction of draft policy NBE12, requiring the retention, protection and enhancement of the existing green and blue infrastructure assets, links and the overall multifunctional network.

Thakeham also agrees with the Council’ demonstration of flexibility and its allowance for negotiations in cases where on-site provision is not feasible.

It is also appreciated that the Council has referred to the East Hampshire Green Infrastructure Strategy, GI Framework Urban Greening Factor Standard and Natural England’s GI Principles which offer additional guidance in this context.

Policy DES1 ‘Well-Designed Places’

As a sustainable place-maker and community creator, Thakeham supports the Council’s Vision for new development to be well designed as set out under the objectives outlined in draft policy DES1. We commend the Council’s for raising the bar on placemaking. However, the policy

should be more flexibly worded to acknowledge the ability of small sites to contribute towards the criteria listed in the policy

Policy DES3 ‘Residential Density and Local Character’

Thakeham supports good design that is of appropriate density and character to the locality, however, it is also important to promote the efficient use of land. The appropriate density of new development should be considered on a site by site basis, taking into account the character of the area but also the ability to make best use of land which reduces the number of sites that are needed to meet housing needs. It is not considered appropriate to fix, through policy, the density of development at the range of nearby development as this may not meet this objective and is unable to account for local character; it should be reworded to enable greater flexibility.

Policy HWC1 ‘Health and Wellbeing of Communities’

As a founding member of the NHS Healthy New Towns programme, Thakeham fully recognises healthy and active lifestyles can be encouraged via provision of active design principles, sustainable travel, access to green infrastructure and local community facilities in new development.

All Thakeham developments are designed around putting health and wellbeing at the heart of the community, and we support the provisions identified at Policy HWC1.1.

However, Policy HWC1.2 suggests all development over 50 units should provide a Health Impact Assessment in support of any application. Thakeham propose that this policy is unnecessary as the Council should have already undertaken a HIA as part of its assessment of suitable sites for allocation in the Local Plan. Therefore, the requirement to provide a further HIA on sites that have already been assessed by the Council would be repetitive, add additional cost to developer applications, and result in additional workload for planning case officers.

Accordingly, we recommend Policy HWC1.2 is removed.

Policy DCG1 ‘Infrastructure’

Thakeham is an infrastructure-led developer, whereby we deliver our infrastructure commitments, delivering early in the construction process to ensure usability by the residents when they are ready to move in. Therefore, we support the Council’s aspiration to deliver the right infrastructure for developments.

However, Policy DCG1.2 states that *‘Development proposals must consider all the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.’* This is expanded further at paragraph 8.18, which states that developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both onsite off site to site to serve the development. It should be noted that the capacity of the sewage network is not a land use planning matter for consideration on an application by

application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991).

In light of this, Policy DGC1.2 should be re-worded by removing 'not just those', so it relates to infrastructure considerations of the site and immediate vicinity only.

Policy H1 'Housing Strategy'

Thakeham supports the focus of new development within the most sustainable and accessible locations as outlined in the settlement hierarchy. However, Draft policy H1 notes that there is provision made for 'about 3,500 new homes' in the plan period. However, this does not account for the requirements set out at Paragraph 9.18, which suggest there should be a buffer of between 10-15% in order to allow for sites allocated not coming forward during the Plan Period.

In order to achieve this, the Council must therefore seek to allocate between 3,765 and 4,219 dwellings, which is significantly more than the 3,443 dwellings currently identified. This may also require additional housing when working with SDNP to help deliver on their unmet need. Alton is already taking a significant amount in this plan period, and it is therefore suggested that additional allocations should be located within Tier 2 and Tier 3 settlements.

Policy H2 'Housing Mix and Type'

Thakeham is a place-maker and community creator, which requires a mixture of people to ensure our developments work. As part of this, we provide homes to meet all needs, whether it is market or affordable housing, for first time buyers, families or downsizers.

Policy H2.4 states a 'proportion of affordable dwellings to be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3)' but does not define the expected provision. Similar policies elsewhere propose a 5% delivery of affordable homes to be M4(3), which would be a reasonable option to insert here. In its current format, the policy is unclear and is open to interpretation and debate, which risks no provision on a number of sites.

Policy H3 'Affordable Housing'

Thakeham supports the Council's aspiration to meet the needs of all its residents through the inclusion of affordable housing policy.

At Thakeham, we pride ourselves that we have always delivered policy compliant schemes and always met council policy. We have never resorted to a viability exercise to shirk our responsibility to deliver affordable homes. Accordingly, we support the Council's target of delivering 40% affordable housing for all sites of 10 dwellings or more.

We are concerned that the proposals to deliver 70% of all affordable housing as affordable rent, with 30% other affordable home ownership products is too rigid. There is no mechanism to review the 70% if Registered Providers can justify a higher percentage of affordable ownership requirements in an area. Therefore, the policy should be amended to suggest the starting position will be 70% affordable rent and 30% others, but alternatives can be agreed with the Local Authority if justifiable.

Summary and Conclusions

Overall, Thakeham is supportive of the Regulation 18 Draft local Plan, in particular the aims and objectives of the Plan as well as the allocation of land south of Five Heads Road, Horndean for residential development.

However, as set out against Policy S1 above, significant additional allocations are required to support the necessary uplift in housing need beyond those already identified. In order to help the Council, Thakeham proposes the inclusion of the following suitable/available/achievable and deliverable sites:

- Land north of Alton Lane, Four Marks – c.90 homes
- Land south of Telegraph Lane and east of Alton Lane, Four Marks – c.10 homes

We trust that these representations are useful and clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any further queries or require any further information.

Yours faithfully,





THAKEHAM

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

4 March 2024

Dear Sir / Madam,

East Hampshire Local Plan 2021 – 2040: Regulation 18 Draft Local Plan Consultation Land north of Alton Lane, Four Marks

Introduction

Thakeham Homes Limited ('Thakeham') is writing in response to the East Hampshire Regulation 18 Draft Local Plan Consultation ("Reg 18 Draft") prepared by East Hampshire District Council ('the Council'), specifically in relation to Land north of Alton Lane, Four Marks, hereinafter referred to as "the Site".

Thakeham has interests in a number of locations throughout the District of East Hampshire ('the District'), and various representations have therefore been produced in respect of these interests, including a general representation on wider Regulation 18 Draft Plan aspects, as detailed in the appended letter, which should be read alongside this representation.

About Thakeham

Thakeham is a pioneering community creator at the forefront of placemaking in the UK. We deliver top quality developments, designed for sustainable living and firmly rooted in community values. Our industry-leading focus on building net zero carbon homes and cohesive, empowered neighbourhoods has led us to become a leading homebuilder in the south of England. We're proud to bring quality homes, infrastructure and amenities together to help people and planet thrive.

At Thakeham, we create amazing places to live – for generations today and in the years to come. Our approach sets us apart from our competitors, ensuring at every stage that we leave a legacy behind that everyone can be proud of.

Thakeham designs all homes to reflect the character of the area, using materials of the highest quality, and be tenure-blind, building the affordable homes to same quality and exterior specification as the market homes.

Whether it's building net zero carbon homes, water efficiency and biodiversity stewardship or supporting active travel solutions and community-owned assets, we take a holistic, forward thinking approach to placemaking by establishing more resilient developments. Climate

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

www.thakeham.com

Registered in England & Wales Company Registration No. 07278594 VAT reg number: 102691050
Registered Office Address: Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

change, nature recovery, people and communities lie at the heart of our sustainability strategy. As a Thakeham is part of the Future Homes Hub, the organisation leading an industry roadmap to achieve environmental goals, we're committed to delivering on industry-leading sustainability goals.

From 2025, all new Thakeham homes will be net zero carbon, meaning that emissions from heating, lighting and cooling will be zero or below. We will also continue to measure the embodied carbon emissions from our homes, including across the supply chain, to create a baseline from which to reduce embodied carbon across the construction process as much as possible.

Since 2020, we've consistently gone beyond Part L building regulation targets for carbon emissions. Equipping homes with increased insulation, PV panels, air source heat pumps (where possible), electric vehicle charging points, hedgehog highways and nesting boxes for swifts and bats.

We are also committed to providing a biodiversity net gain of at least 10% on our developments, in many cases exceeding this, and are proud to be a Planet Mark-certified carbon neutral business and the official sustainability partner for England Netball.

However, we understand that sustainability and biodiversity represent more than just numbers, so we go beyond this to ensure that the wider area also benefits from the communities we create;

- Thakeham schemes are design and infrastructure-led; engaging with statutory authorities and other stakeholders from the start of a project. This facilitates the delivery of physical, social and green/blue infrastructure which benefits the wider area, as well as new residents.
- We seek to increase our residents' connection to nature, working closely with charities such as Surrey Wildlife Trust and Plantlife to increase their awareness and understanding of the natural world.
- We engage local primary schools with our award-winning educational initiative, 'Eddie & Ellie's Wild Adventures' to promote the importance of ecology and biodiversity, delivering National Curriculum linked activities and early career-based learning.
- Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality, and reduces carbon emissions.
- Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (one tonne of MacRebur mix contains the equivalent of 80,000 plastic bottles), as well as products part of a circular economy.
- Having gold membership with the Supply Chain Sustainability School, we ensure that our whole supply chain is as local as possible.
- On site, we monitor and aim to minimise construction travel emissions, construction waste and energy consumption.
- Thakeham is registered with the Considerate Constructors Scheme.

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

www.thakeham.com

Response to consultation

The Site has been promoted throughout the emerging plan-making process as a sustainable location for residential development.

The Site is being promoted by Thakeham Homes for circa 90 residential dwellings, including 40% affordable homes for local people in line with policy requirements. The layout is landscape-led, with significant new trees and hedgerows ensuring the development is well screened, whilst also providing new habitats to improve on-site biodiversity. Proposals include open space and children's play space to encourage outdoor exercise and socialising to improve health and wellbeing. The development will be net zero carbon in lifetime use to ensure all homes are climate resilient, and there will be on-site SuDs facilities to mitigate any possible surface water flooding. The proposals have been designed to ensure all aspects of the development accord with the objectives of the Local Plan to provide sustainable homes for local residents.



Indicative Masterplan (from supporting Vision Document)

In addition to the above, the Council has also considered the Site as part of two larger strategic allocations across the south of Four Marks.

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

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Company Registration No. 07278594. Registered Office Address: Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

Land Availability Assessment (LAA) & Integrated Impact Assessment (IIA)

As part of the preparation of Local Plan 2021-2040, the Site was assessed in the LAA under reference LAA/FM-025, where suitability for development has been assessed against existing constraints and identified the following: countryside character and TPO on northwestern boundary. We address these points below and set out why they should not be considered a barrier to housing provision on the Site.

Landscape and Countryside Character

Whilst Four Marks is rural in its setting, the Site is surrounded by residential development on all sides along Lymington Bottom and Alton Lane. The Site is also directly adjacent to the settlement boundary, with additional residential development further east, west and south of the Site. It is characterised by its edge of settlement location.

Accordingly, the Site cannot be considered to be truly rural in nature and forms the natural final developable area in the south west corner of the settlement to be built out.

Tree Preservation Order (TPO)

A TPO covers a group of trees that lie on the north western boundary of the site. As part of development proposals we have identified a 20m buffer from the edge of the TPO area and will include open space, drainage and biodiversity habitat in this part of the Site to ensure there is no impact on the trees, including their roots and canopies.

Given the trees are on the boundary of the site and a buffer has been identified, we would advise the Council that this has been suitably mitigated.

Summary

In light of the above, Thakeham believe the aforementioned constraints are not fundamental and can easily be mitigated, therefore, the Site should be included as a draft site allocation. Indeed, the assessment found that the Site is developable for residential development. Therefore, it should be included in the assessment under the IIA.

The Site has also been considered as part of two larger sites: Four Marks South (LAA/FM-031 for circa 390 dwellings), and Land at Four Marks, south (LAA/FM-042 for 860 dwellings). The IIA concludes that both of these are of a scale that is not appropriate for a settlement such as Four Marks which is a Tier 3 settlement.

However, the IIA made no such recommendation to reject the standalone site (Ref. LAA/FM-025). Accordingly, the Site should be included as an allocation within the emerging Plan.

The Integrated Impact Assessment was undertaken across all submitted sites in the district, and assesses the suitability of sites against 12 objectives for the Local Plan, which are set out in the table below:

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

Table 1: East Hampshire Integrated Impact Assessment Objectives

Thakeham agrees that these objectives are an appropriate measure to assess potential development Sites against to ensure Sites meet the needs of the Local Plan.

Each objective has been graded from significant positive effect, through mixed effect to significant negative effect as well as negligible to ensure sites are in accordance with the requirements of the Local Plan.

For the purposes of these representations, we are not commenting on the IIA of the larger strategic sites, as we are not promoting the Site as part of a wider opportunity, but as a standalone proposal for circa 90 dwellings.

Accordingly, our assessment solely looks at the assessment of the Site (Ref. LAA/FM-025) and our reasoning as to why it accords with the objectives for the Local Plan and should therefore be identified a housing allocation in the emerging Local Plan.

Thakeham agrees with the conclusions of the assessment regarding objectives 1, 5, 6, 8, 9 and 12, which confirm the Site would have positive effects. However, we make the following points against the remaining objectives:

Objective 2: negligible effect against carbon emissions and achieving net zero.

As set out above, as well as confirmation in the attached Vision Document, Thakeham is committed to delivering net zero carbon homes through sustainable construction as well as solar panels, air source heat pumps, measures to reduce water consumption and fast electric vehicle charging points. This will ensure all homes are resilient against and ready to adapt for climate change in the future.

Proposed amendment to assessment: significant positive effect against this objective.

Objective 3: negligible effect on adaption and resilience to climate change

As set out above and in all our previously submitted representations, as well as confirmation in the attached Vision Document, all houses will be net zero carbon through sustainable construction as well as solar panels, air source heat pumps, measures to reduce water consumption and fast electric vehicle charging points. This will ensure all homes are resilient against and ready to adapt for climate change in the future.

*Proposed amendment to assessment: **significant positive effect against this objective.***

Objective 4: major negative effect against accessibility and well-integrated communities

The Site has scored negatively due to an apparent low score in the Ridge Accessibility Assessment. Table 5.2 assesses each sites accessibility to facilities within 10 min walk or cycle equally across six criteria. It should be noted that the Site performs well against all criteria except 'working'. Four Marks is a Tier 3 settlement, which is defined in the Local Plan as only providing facilities to meet some of the everyday needs of local residents. It is therefore to be expected that the Site would not perform strongly against the 'working' criteria as there is little provision for jobs in the area. If this criterion is removed, or re-weighted, the Site performs much more strongly. With regard to integration, development of the Site as set out in the indicative Masterplan would complete the form of development that continues south along Telegraph Lane and west along Alton Lane.

*Proposed amendment to assessment: **minor positive effects against this objective***

Objective 7: negligible effect against built and cultural heritage assets

There are no listed buildings in proximity of the Site, and no other heritage assets nearby. Therefore it is agreed that there would be negligible effect here.

*Proposed amendment to assessment: **negligible effects against this objective***

Objective 10: major negative effect against efficient and sustainable use of natural resources

It appears that of 219 sites assessed against this objective, only 16 sites do not have a negative effect (7% of all sites). This appears to suggest that nearly all development would have a negative impact against the district's natural resources. It should be noted that Thakeham has a strong track record of sustainable construction, as well as our commitment to carbon neutral construction in the near future. Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (one tonne of MacRebur mix contains the equivalent of 80,000 plastic bottles), as well as products part of a circular economy, which will further ensure we reduce our impact on natural resources.

*Proposed amendment to assessment: **negligible effects against this objective***

Objective 11: minor negative effect against water resource management

Thakeham acknowledges the important role that housing has to play in future water usage and consumption. It is why we are at the forefront of water consumption studies and solutions, using at least 5 litres less per home per day than existing housing stock and we continue to seek ways of reducing daily usage further, which will be reflected in future construction.

*Proposed amendment to assessment: **major positive effects against this objective***

In light of the above, Thakeham supports the methodology used for the LAA and IIA, but suggests that the assessment should be updated to take account of current and previous representations and associated information we have submitted for this site, which shows that the Site performs extremely strongly against all the main objectives of the Local Plan. A

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summary of the previous assessment, as well as the proposed amended findings are set out in the table below:

	IIA Objective											
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12
2023 IIA Findings	0	0	0	--	+	++	0	+	+	--	-	0
Thakeham Updated	0	++	++	+	+	++	0	+	+	+/-	++	0

Table 2: Summary of findings and updated assessment

This shows the Site performs favourably against the objectives of the Local Plan and should be considered as an updated housing allocation going forwards.

Draft Local Plan Allocation and comment

Thakeham supports the Council’s position that Four Marks is a sustainable location for development in East Hampshire with access to facilities, but also provides good access to the open countryside. It is also acknowledged that there are few physical constraints in the area.

Whilst the Council has acknowledged delivery of 69 dwellings between 2021 and 2023, as well as identified three new sites for housing in Four Marks, comprising 210 new homes up to 2040, this does not support the levels of growth in Four Marks. In 2001, the census data showed a population of 3,602. In 2011, the census data showed a population of 4,067 (an increase of 465 or 12.9%). In 2021, this had increased by 1,550 (a further 27.5% increase) to 5,617. This shows a population increase in Four Marks of between 13% and 27% every ten years. However, the provision of 269 new homes over the Plan period would result in expected growth of 3.6% over 19 years. This is clearly not sufficient housing to accommodate growth across Four Marks and additional sites must be identified to accommodate the likely future need.

As set out above, Land north of Alton Lane, Four Marks has been promoted throughout the plan-making process. The Site has already been assessed positively in the LAA, and as set out above, also performs strongly against the IIA.

In light of the above, Thakeham can confirm that the Site is:

- Suitable – the Council’s assessments and Draft Local Plan confirm this is a suitable location for development;
- Available – The Site is fully under our control and can come forward early in the plan period;
- Deliverable – as shown within the attached Vision Document, we have already worked up a deliverable scheme informed by a suite of studies identifying constraints and opportunities.

Accordingly, the Site is an appropriate allocation to provide necessary housing for the residents of East Hampshire.

Conclusion

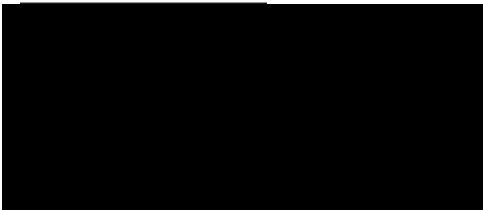
In light of the continued growth of Four Marks as a settlement, whilst only providing a nominal amount of new homes here, it is necessary to identify and allocate significant additional housing here.

This representation, together with the submitted Vision Document, demonstrates why the Site is suitable for development, available and deliverable immediately, is viable for housing development and how the constraints identified previously can be mitigated accordingly through high quality design.

We trust that this is taken into account in the process going forward and we would be grateful for confirmation of receipt.

We look forward to engaging in a constructive dialogue and contributing positively to the planning process. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully,



Appendix 1 – Thakeham General Reps to Regulation 18 Draft Plan consultation
Appendix 2 – Vision Document

Appendix 1 – Thakeham General Reps to Regulation 18 Draft Plan consultation

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THAKEHAM

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

4 March 2024

Dear Sir / Madam,

East Hampshire Local Plan 2021 – 2040: Regulation 18 Draft Local Plan Consultation Thakeham Homes General Representations

Introduction

Thakeham Homes Limited ('Thakeham') is writing in respect of the East Hampshire Regulation 18 Draft Local Plan Consultation ('Reg 18 Draft') prepared by East Hampshire District Council ('EHDC').

Overall, Thakeham is supportive of the aspirations of the Regulation 18 Draft Local Plan, particularly the Council's sustainability aspirations, around net zero carbon, Biodiversity Net Gain and the creation of sustainable communities; which are wholly aligned with Thakeham's values. Furthermore, we support the inclusion of the residential allocation for Land south of Five Heads Road, Horndean (Site Allocation HDN2) for 118 homes

However, there are some policies that require amendment to ensure deliverability of the Plan's objectives, crucially delivering against housing needs. Thakeham agrees with the Council's calculation of the Standard Method, which is 578 dwellings per annum (dpa) or 10,982 over the Plan Period. We also appreciate the difficulties arising within National Parks. However, it is unlikely that the South Downs National Park Authority will be able to meet its own housing needs given the level of protection for National Parks, we therefore submit that the Plan underestimates the level of residual unmet need and the contribution that is made towards this unmet need should be higher.

We submit in light of the above, EHDC should allocate further sites for residential use, and Thakeham respectfully asks EHDC to reconsider the assessments of the following suitable/available/achievable and deliverable sites:

- Land north of Alton Lane, Four Marks – c.90 homes
- Land south of Telegraph Lane and east of Alton Lane, Four Marks – c.10 homes

Individual representations are made in relation to each of these sites, including a Vision Document for each, demonstrating how these sites could be brought forwards to meet both local and district housing needs.

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Response to consultation

Thakeham has reviewed the consultation documents and provides comments on the relevant policies below. However, the first point to note is the proposed timescales to adoption of this Local Plan at Figure 1.4 of the consultation document, which suggest the Council can have an adopted Plan by Summer 2025, some 15 months from now.

Whilst Thakeham supports the Council's willingness to push forwards to an adoption, we believe the timescales are overly optimistic. We therefore set out anticipated timescales for each stage as well as an updated timetable below:

- Consideration of responses to Reg 18 Draft Plan consultation (6 months);
- Preparation and Council sign-off of Reg 19 consultation (3 months);
- Reg 19 consultation (1.5 months);
- Consideration or responses to Reg 19 consultation and prep of submission (3 months);
- Submit Plan to SoS (1 day);
- PINS prep time and average time from submission to EiP (6 months);
- Examination in Public (1 month);
- Inspector considers interim advice after EiP (0.5 months);
- Main Modifications prep and consultation (6 months);
- Inspectors Final Report (1 month);
- Council sign-off and adoption of Local Plan (1 month).

In light of the above, the process from this stage is still likely to take 30 months, which would suggest a more realistic timetable of:

- November-December 2024 – Public consultation on Reg 19 Submission Plan
- March 2025 – Submit Local Plan for Examination
- September-October 2025 – Examination in Public
- June/July 2026 – Planning Inspector's Report
- September 2026 – Adopt the Local Plan

Policy S1 'Spatial Strategy'

Draft Policy S1 outlines the spatial strategy for the Local Plan over the period 2021-2040, with aims to deliver a total of 9,082 new homes at 478 dwellings per annum. In light of the comments above, about the Plan taking a year longer to reach adoption, we would recommend the Local plan period is extended to run 2021-2041 to account for the additional time.

Thakeham notes that the total housing numbers proposed over the plan period do not account for meeting any unmet need from other LPA areas other than the South Downs National Park (SDNP). Furthermore, the Plan makes an assumption based on the likely unmet need arising from the National Park. It is likely that there will be a need for higher housing numbers than suggested and suggest that ongoing liaison with the South Downs National Park Authority, who are also undertaking a review of their Local Plan, would quantify the level of unmet need which would need to be accommodated by EHDC.

In addition to the above, Paragraph 9.18 of Policy H1 'Housing Strategy' states that *"there needs to be some allowance for flexibility and to allow for sites allocated not coming forward during the Plan Period. Therefore, sites capable of supplying a further 10-15% should be allocated to create a buffer"*.

Assuming the 9,082 dwelling requirement is correct, this would require a total provision of between 9,990 homes (10%) and 10,444 homes (15%) across the plan period. Considering the current supply of 6,225 dwellings this would require the allocation of between 3,765 and 4,219 dwellings in new allocations. However, the Council is only proposing to allocation sites for 3,443 dwellings, which would result in a shortfall of between 322 and 776 dwellings across the plan period.

To ensure the Plan is as robust as possible when considered at Examination, we recommend additional sites are identified to address the shortfall.

Policy S2 'Settlement Hierarchy'

Thakeham supports the identification of a settlement hierarchy as the focus for development within the settlements, this ensures that development is directed to the most sustainable locations. The policy also suggests all settlements have a Settlement Policy Boundary, with proposed amendments to the boundary to reflect development.

We support this position with regards the proposed Tier 1 and Tier 2 settlements. However, we note that the Four Marks settlement boundary does not extend to the existing housing down Telegraph Lane, nor does it include any of the housing along Alton Lane, despite these forming part of the built form of Four Marks, both on plan and on the ground. It is therefore recommended that the settlement boundary for Four marks is re-drawn to extend down Telegraph Lane and along Alton Lane.

Furthermore, we note that Four Marks has been demoted to a Tier 3 settlement when it was previously considered a Tier 2 settlement in the previous local plan, there is no justification for this. Given Four Marks includes all the main services, such as shops, restaurants, pubs, healthcare and community facilities, schools and sports clubs, this settlement provides significant services for a wider area and should therefore be retained as a Tier 2 settlement.

Policy CLIM 1 'Tackling the Climate Emergency'

Thakeham is committed to helping to tackle the climate emergency through sustainable construction, net zero carbon homes, delivering in excess of Government mandated 10% biodiversity net gain and reducing water consumption. Indeed, Thakeham was the UK's first housebuilder to sign the SME Climate Commitment, joining the UN's Race To Zero campaign. Accordingly, we are fully supportive of the Council's ambitions to tackle the climate emergency.

However, we note CLIM1.1 appears to be an aspiration rather than specific policy. It is therefore recommended that this paragraph is removed from the policy wording.

Policy CLIM 2 ‘Net Zero Carbon Development: Operational Carbon’

Thakeham supports the approach to seeking net zero carbon and net zero carbon ready homes and is proposing to build these types of development across our sites in East Hampshire.

It is advised that the Council should provide a margin of error to enable flexibility to the estimates for the development’s whole life cycle highlighted in draft policy CLIM3.2.

It is noted that the Council has not provided definition and clarity to “*the risks associated with a changing climate*” as stated in draft policy CLIM5.1, we therefore recommend that the Council provides further specification detail of all of the anticipated risks as a list in bullet point form under the sub-policy in order to avoid confusion.

While these policies demonstrate a commendable commitment to addressing climate change, it is essential to balance environmental objectives with the economic viability of housing developments. We would advocate for ongoing discussions with the Council to strike a balance that supports sustainable practices while maintaining the feasibility of housing development.

Natural and Built Environment

Thakeham places great importance on protecting the natural environment and this is demonstrated in our portfolio of landscape-led developments which prioritises green and blue infrastructure, delivering net biodiversity gain and support local wildlife.

Policy NBE2 and NBE3 ‘Biodiversity’

Draft policy NBE2 and NBE3 together outline a set of criteria which only permits development proposals where it can be demonstrated that there would be no adverse impact on designated wildlife sites, protection and enhancement of priority species and priority habitats, achievement of at least 10% biodiversity net gain. This aligns with Thakeham’s sustainability commitments and we consider that there is the potential for all development to aspire to providing in addition of the 10% BNG required in the Environment Act 2021.

Policy NBE4 to NBE6 ‘Nutrient Neutrality’

Thakeham recognises that nutrient neutrality is a widespread issue across the UK and East Hampshire is one of the many authorities which are affected by this. Draft policy NBE6 and NBE9 sets out mitigation methods which may include a financial contribution, a developer-provided package of measures to avoid or mitigate effects on the SPAs, or a combination of both. We acknowledge that EHDC has produced the ‘East Hampshire position statement and mitigation plan’ to assist with planning applications and therefore recommend the Council to consider providing reference to this mitigation plan within the policy to ensure consistency.

Policy NBE7 ‘Managing Flood risk’

We consider that draft policy NBE7 sets out a systematic approach to flood risk assessment and management within housing development and are thus in support of this policy. Thakeham

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welcomes the inclusion of policy NBE7.4 which recognises the multiple functions SuDs features have for amenity, open space and biodiversity.

Policy NBE8 ‘Water quality, supply and efficiency’

Thakeham supports the desire to reduce water consumption as set out in policy NBE8.4 by stipulating a standard of no more than 95 litres per person per day. Thakeham welcomes the acknowledgement that seeking to achieve this may have impacts on scheme deliverability and should therefore be considered holistically alongside other requirements and considered on a site by site basis.

Policy NBE10 ‘Landscape’

In Thakeham’s portfolio of proposals, we have consistently strived for clear emphasis on conserving and enhancing the special characteristics and visual amenity of local landscapes. While this has previously posed some challenges, particularly on suitable sites with complex topography, Thakeham has consulted with the relevant stakeholders and landscape consultants to create aesthetically pleasing and environmentally sensitive projects that align with the community’s values. This draft policy NBE10 encourages developers to adopt a landscape-led approach, which we support and are committed to pursuing.

Policy NBE11 ‘Gaps between settlements’

Thakeham supports the Council’s objective of preserving the distinctive characteristics individual towns and villages each have their own unique characteristics and that their separate identity is maintained. However, we would suggest gaps between settlements is subjective and a more appropriate way of achieving individuality of settlements would be through a policy that seeks the protection of settlements from coalescence.

Policy NDE12 ‘Green and Blue Infrastructure’

Thakeham supports the objective and policy direction of draft policy NBE12, requiring the retention, protection and enhancement of the existing green and blue infrastructure assets, links and the overall multifunctional network.

Thakeham also agrees with the Council’ demonstration of flexibility and its allowance for negotiations in cases where on-site provision is not feasible.

It is also appreciated that the Council has referred to the East Hampshire Green Infrastructure Strategy, GI Framework Urban Greening Factor Standard and Natural England’s GI Principles which offer additional guidance in this context.

Policy DES1 ‘Well-Designed Places’

As a sustainable place-maker and community creator, Thakeham supports the Council’s Vision for new development to be well designed as set out under the objectives outlined in draft policy DES1. We commend the Council’s for raising the bar on placemaking. However, the policy

should be more flexibly worded to acknowledge the ability of small sites to contribute towards the criteria listed in the policy

Policy DES3 ‘Residential Density and Local Character’

Thakeham supports good design that is of appropriate density and character to the locality, however, it is also important to promote the efficient use of land. The appropriate density of new development should be considered on a site by site basis, taking into account the character of the area but also the ability to make best use of land which reduces the number of sites that are needed to meet housing needs. It is not considered appropriate to fix, through policy, the density of development at the range of nearby development as this may not meet this objective and is unable to account for local character; it should be reworded to enable greater flexibility.

Policy HWC1 ‘Health and Wellbeing of Communities’

As a founding member of the NHS Healthy New Towns programme, Thakeham fully recognises healthy and active lifestyles can be encouraged via provision of active design principles, sustainable travel, access to green infrastructure and local community facilities in new development.

All Thakeham developments are designed around putting health and wellbeing at the heart of the community, and we support the provisions identified at Policy HWC1.1.

However, Policy HWC1.2 suggests all development over 50 units should provide a Health Impact Assessment in support of any application. Thakeham propose that this policy is unnecessary as the Council should have already undertaken a HIA as part of its assessment of suitable sites for allocation in the Local Plan. Therefore, the requirement to provide a further HIA on sites that have already been assessed by the Council would be repetitive, add additional cost to developer applications, and result in additional workload for planning case officers.

Accordingly, we recommend Policy HWC1.2 is removed.

Policy DCG1 ‘Infrastructure’

Thakeham is an infrastructure-led developer, whereby we deliver our infrastructure commitments, delivering early in the construction process to ensure usability by the residents when they are ready to move in. Therefore, we support the Council’s aspiration to deliver the right infrastructure for developments.

However, Policy DCG1.2 states that *‘Development proposals must consider all the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.’* This is expanded further at paragraph 8.18, which states that developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both onsite off site to site to serve the development. It should be noted that the capacity of the sewage network is not a land use planning matter for consideration on an application by

application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991).

In light of this, Policy DGC1.2 should be re-worded by removing 'not just those', so it relates to infrastructure considerations of the site and immediate vicinity only.

Policy H1 'Housing Strategy'

Thakeham supports the focus of new development within the most sustainable and accessible locations as outlined in the settlement hierarchy. However, Draft policy H1 notes that there is provision made for 'about 3,500 new homes' in the plan period. However, this does not account for the requirements set out at Paragraph 9.18, which suggest there should be a buffer of between 10-15% in order to allow for sites allocated not coming forward during the Plan Period.

In order to achieve this, the Council must therefore seek to allocate between 3,765 and 4,219 dwellings, which is significantly more than the 3,443 dwellings currently identified. This may also require additional housing when working with SDNP to help deliver on their unmet need. Alton is already taking a significant amount in this plan period, and it is therefore suggested that additional allocations should be located within Tier 2 and Tier 3 settlements.

Policy H2 'Housing Mix and Type'

Thakeham is a place-maker and community creator, which requires a mixture of people to ensure our developments work. As part of this, we provide homes to meet all needs, whether it is market or affordable housing, for first time buyers, families or downsizers.

Policy H2.4 states a 'proportion of affordable dwellings to be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3)' but does not define the expected provision. Similar policies elsewhere propose a 5% delivery of affordable homes to be M4(3), which would be a reasonable option to insert here. In its current format, the policy is unclear and is open to interpretation and debate, which risks no provision on a number of sites.

Policy H3 'Affordable Housing'

Thakeham supports the Council's aspiration to meet the needs of all its residents through the inclusion of affordable housing policy.

At Thakeham, we pride ourselves that we have always delivered policy compliant schemes and always met council policy. We have never resorted to a viability exercise to shirk our responsibility to deliver affordable homes. Accordingly, we support the Council's target of delivering 40% affordable housing for all sites of 10 dwellings or more.

We are concerned that the proposals to deliver 70% of all affordable housing as affordable rent, with 30% other affordable home ownership products is too rigid. There is no mechanism to review the 70% if Registered Providers can justify a higher percentage of affordable ownership requirements in an area. Therefore, the policy should be amended to suggest the starting position will be 70% affordable rent and 30% others, but alternatives can be agreed with the Local Authority if justifiable.

Summary and Conclusions

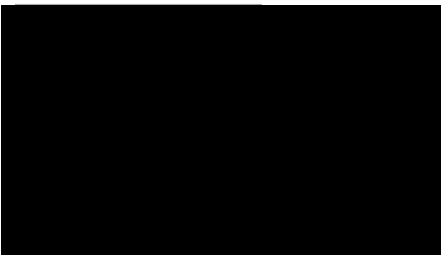
Overall, Thakeham is supportive of the Regulation 18 Draft local Plan, in particular the aims and objectives of the Plan as well as the allocation of land south of Five Heads Road, Horndean for residential development.

However, as set out against Policy S1 above, significant additional allocations are required to support the necessary uplift in housing need beyond those already identified. In order to help the Council, Thakeham proposes the inclusion of the following suitable/available/achievable and deliverable sites:

- Land north of Alton Lane, Four Marks – c.90 homes
- Land south of Telegraph Lane and east of Alton Lane, Four Marks – c.10 homes

We trust that these representations are useful and clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any further queries or require any further information.

Yours faithfully,



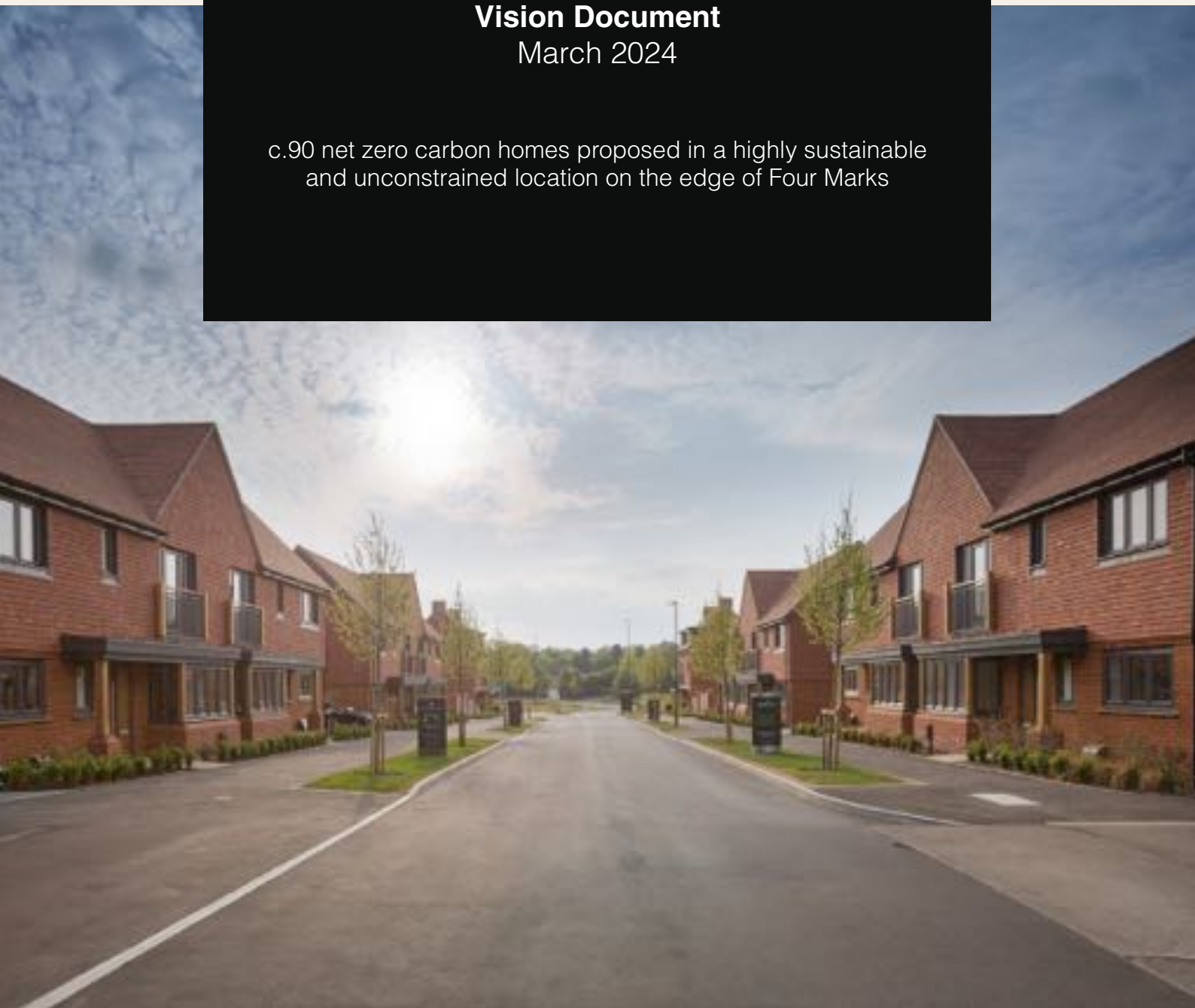


THAKEHAM

*Land North of Alton Lane,
Four Marks*

Vision Document
March 2024

c.90 net zero carbon homes proposed in a highly sustainable
and unconstrained location on the edge of Four Marks





Contents

- 04 Introduction to the Site
- 06 Illustrative site masterplan
- 08 Delivering a net zero carbon community
- 10 More than housing: Homes for all
- 12 Leaving nature better than we found it
- 14 Health and wellbeing
- 16 Active travel, sustainable transport
- 18 Placemaking and designing beautiful





Introduction to The Site

A net zero carbon development, with community wellbeing, active travel and forward thinking sustainability practices at its heart.

Thakeham is known for designing and building beautiful, well-integrated places, where communities can thrive. By letting the natural landscape and environment lead the way and championing a connected community, our vision for Alton Lane, Four Marks offers a unique opportunity for sustainable, net zero carbon living in the District of East Hampshire.

From preserving and enhancing the natural environment to creating well-supported walking and cycling routes to new local facilities, we will place the health and wellbeing of the community and the environment front and centre. This will fulfill our commitment to provide high quality housing that serves a diverse range of needs, within a green and blue, natural environment.

THE DEVELOPMENT AT ALTON LANE, FOUR MARKS WILL INCLUDE:



c.90 net zero carbon homes



c.36 affordable homes, meeting the 40% affordable housing policy



In excess of 10% Biodiversity Net Gain, swift bricks and hedgehog highways



Provision of pedestrian and cycle routes, storage and parking space to encourage a sustainable and healthy lifestyle



Public open space



Sustainable Urban Drainage Systems



Children's play areas to support outdoor exercise and socialising



Illustrative site masterplan

- 1 Key entrance feature with softened landscape features and open green space.
- 2 Cycle and pedestrian routes throughout the site and on to the existing network.
- 3 New net zero carbon homes, including electric vehicle chargers.
- 4 New open green space with play space provisions.
- 5 New sustainable drainage features that will incorporate new planting to deliver new habitats and at least 10% biodiversity net gain. This will have a benefit for the landscape and for resident's wellbeing.
- 6 Landscape buffer to reduce visual impact on the wider landscape.



*Delivering a
net zero carbon
community*

We are raising the bar on sustainable living. All homes at Alton Lane, Four Marks will be net zero carbon. Nationally, we are leading the way here, well ahead of other major UK housebuilders.

How are we achieving this? Each new home at Alton Lane, Four Marks will combine the highest quality and energy efficient building methods and will benefit from the most sustainable renewable domestic technology. This means that as well as being sustainably constructed, homes will also feature solar panels, rainwater harvesting, fast electric vehicle charging points and more.

A win for the planet – and a win for the residents, who will enjoy significantly lower energy bills as a result – increasingly important to wellbeing as the cost of living rises.

All homes will have easy access to green open spaces, as active travel routes for walking and cycling are woven along existing waterways and green corridors. This will ensure sustainable travel options to local facilities such as schools, community hubs, medical facilities, local employment and sports provision – lowering local emissions as well as creating an attractive place to live, prioritising the physical and mental health of all residents.

When it comes to zero carbon community creation, we lead the way nationally. Alton Lane, Four Marks would represent an important next step in our commitments here. Thakeham was the UK's first housebuilder to sign the SME Climate Commitment, joining the UN's Race To Zero campaign.



*Thakeham has been
a verified carbon
neutral business
since 2023.*





*More than housing:
Homes for all*



Thakeham delivers sustainable and mixed communities with affordable housing at the heart of all our developments.

Throughout our history, we've always delivered policy-compliant schemes, in relation to affordable housing, and always met council policy. We've never resorted to a viability exercise to shirk our responsibility to deliver affordable homes – and we never will.

We are already delivering homes as a trusted partner for housing associations and local authorities across the South East.

OUR PROPOSAL FOR ALTON LANE, FOUR MARKS INCLUDES:

- Delivering on the Council's policy of 40% affordable housing, with circa 36 affordable homes for local people
- Affordable homes which provide a mix of tenures to meet local need and align with Government policy
- Tenure blind affordable homes, built to exactly the same quality and external finish as the private homes and distributed around the development to create a genuinely mixed community
- All homes delivered will be net zero carbon – tackling both the climate emergency and cost of living crisis
- All of the proposed units will meet the Building Regulations of Flexible and Adaptable Housing

We believe that diversity in community is one of its greatest assets, enabling people to come together and interact.

ALTON LANE, FOUR MARKS WILL OFFER MORE THAN JUST HOUSING, WE WILL DELIVER:

- Homes for market sale that can be flexible and adapted
- Homes that provide comfortable, secure living specifically for older people
- Homes for families to grow in and put down local roots
- Homes for downsizers to enjoy a more relaxed lifestyle



*Leaving nature
better
than we found it*

LETTING LANDSCAPE LEAD

Our approach to landscape-led placemaking involves working with, rather than against, the existing natural environment. We will respect and protect the local landscape, to create a carefully considered development which integrates with nature whilst connecting people with their surroundings.

By giving priority to existing green spaces, we can deliver biodiversity net gain, supporting local wildlife at the same time as enhancing social interaction, health and wellbeing. Protecting biodiverse green spaces supports people and nature, building more resilience to the increasing extremes of nature – winter storms, summer heat waves and local air pollution.

A CONNECTED COMMUNITY

We believe nature should be protected – not ring fenced. The best biodiverse developments create places abundant with wildlife and natural beauty whilst providing people with the opportunity to connect with it. Communities gain from the mental, physical and social benefits green spaces and waterways provide, at the same time as becoming more invested in the ongoing protection of a treasured local landscape.

A NET GAIN FOR BIODIVERSITY

Our proposals for Alton Lane, Four Marks will deliver a 10% biodiversity net gain in accordance with legislation and local policy. We will also support additional habitat creation through the use of swift bricks, hedgehog highways and bird and bat boxes. This means there will be a demonstrable overall improvement in natural habitats and nature locally.

We will support the local environment by:

- Protecting valuable existing habitat
- Enhancing existing habitats through good management practices for now and the future
- Creating new biodiverse habitats that go beyond formal commitments – such as hedgehog highways in fences and bird and bat boxes in new buildings
- Installing one swift brick for every home on the development
- Launching our award-winning educational “Eddie and Ellie” programme in local Primary Schools



Swift Brick





Putting health & wellbeing at the heart of the community



As placemakers, we recognise our responsibility to create spaces that support happier, healthier lives.

Our immediate environment plays a significant role in our mood, health, short and long term outcomes. As a result, wellbeing is at the heart of our vision for sustainable development and community creation.

Whether creating jobs, homes, or school spaces, we believe that well-planned communities have the power to change lives for the better. Alton Lane, Four Marks is our chance to improve community wellbeing in the district for generations to come. Through development of the Site, we will deliver new homes, including affordable homes, against acute housing need; we are able to deliver bungalows for down sizers, all in a highly sustainable location on the edge of Four Marks.

This community would be a gateway to healthy lifestyles and well-being; with a series of pedestrian and cycle routes nestled within the local network of green and blue spaces/habitats, connecting to recreational routes and along Alton Lane and Lymington Bottom to the centre of Four Marks. There will also be abundant opportunities for healthy, outdoor recreational activities through the use of open space within the proposal.

Guided by the NHS Healthy New Town principles and a commitment to zero carbon placemaking, we would create a healthy and connected community with integrated and high-quality services without the need for car dependency – delivering a boost to both mental and physical wellbeing.

Our legacy will be an inspirational blend of health, wellbeing, productivity and a new benchmark of what sustainable placemaking can provide.



*Active travel,
sustainable transport*

By considering the way people move, interact, work and play, we will balance the location of facilities and infrastructure (both new and existing) to meet daily needs and reduce the need for travel as well as delivering a range of sustainable travel options to encourage residents out of the private car; utilising public transport, walking and cycling.

Access from Lymington Bottom to the village centre ensures that all local facilities are within a 16-minute walk or 4-minute bike ride, making this a sustainable location for development. The Site will offer strong permeability via all modes of active transport with connection to onward public highway and convenient/secure onsite storage for bikes.

The environmental impact of private cars will be reduced, but beyond that, communities will be more connected to their landscape, and to each other.





Placemaking & designing beautiful

We don't just build houses. We're placemakers – committed to creating extraordinary new places, with the highest attention to detail and always designing and building beautiful places and homes.

Alton Lane, Four Marks represents an opportunity to deliver a development which showcases our core expertise and focus – sustainable development and cohesive communities. And from the quality of our construction to our social responsibilities, we always go the extra mile.

A Thakeham development will always be an asset to its surroundings and the local community. We strive to enhance the quality of life for everyone in the community, not just the people who buy our homes. And we're always aiming for higher environmental standards, both on our developments and in our own working practices.

From sponsoring local community sports teams to a recruitment strategy that includes local apprenticeships throughout the entire lifecycle of a development. As a socially responsible developer, we make a positive contribution to the lives of local communities.



At Thakeham, we have an opportunity and a duty to create amazing places; we are driven by a passion to deliver a legacy for many to enjoy and that we are proud of.

Rob Boughton,
CEO of Thakeham





THAKEHAM

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THAKEHAM

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

4 March 2024

Dear Sir / Madam,

East Hampshire Local Plan 2021 – 2040: Regulation 18 Draft Local Plan Consultation Land west of Telegraph Lane and south of Alton Lane, Four Marks

Introduction

Thakeham Homes Limited ('Thakeham') is writing in response to the East Hampshire Regulation 18 Draft Local Plan Consultation ("Reg 18 Draft") prepared by East Hampshire District Council ('the Council'), specifically in relation to Land west of Telegraph Lane and south of Alton Lane, Four Marks, hereinafter referred to as "the Site".

Thakeham has interests in a number of locations throughout the District of East Hampshire ('the District'), and various representations have therefore been produced in respect of these interests, including a general representation on wider Regulation 18 Draft Plan aspects, as detailed in the appended letter, which should be read alongside this representation.

About Thakeham

Thakeham is a pioneering community creator at the forefront of placemaking in the UK. We deliver top quality developments, designed for sustainable living and firmly rooted in community values. Our industry-leading focus on building net zero carbon homes and cohesive, empowered neighbourhoods has led us to become a leading homebuilder in the south of England. We're proud to bring quality homes, infrastructure and amenities together to help people and planet thrive.

At Thakeham, we create amazing places to live – for generations today and in the years to come. Our approach sets us apart from our competitors, ensuring at every stage that we leave a legacy behind that everyone can be proud of.

Thakeham designs all homes to reflect the character of the area, using materials of the highest quality, and be tenure-blind, building the affordable homes to same quality and exterior specification as the market homes.

Whether it's building net zero carbon homes, water efficiency and biodiversity stewardship or supporting active travel solutions and community-owned assets, we take a holistic, forward thinking approach to placemaking by establishing more resilient developments. Climate

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change, nature recovery, people and communities lie at the heart of our sustainability strategy. As a Thakeham is part of the Future Homes Hub, the organisation leading an industry roadmap to achieve environmental goals, we're committed to delivering on industry-leading sustainability goals.

From 2025, all new Thakeham homes will be net zero carbon, meaning that emissions from heating, lighting and cooling will be zero or below. We will also continue to measure the embodied carbon emissions from our homes, including across the supply chain, to create a baseline from which to reduce embodied carbon across the construction process as much as possible.

Since 2020, we've consistently gone beyond Part L building regulation targets for carbon emissions. Equipping homes with increased insulation, PV panels, air source heat pumps (where possible), electric vehicle charging points, hedgehog highways and nesting boxes for swifts and bats.

We are also committed to providing a biodiversity net gain of at least 10% on our developments, in many cases exceeding this, and are proud to be a Planet Mark-certified carbon neutral business and the official sustainability partner for England Netball.

However, we understand that sustainability and biodiversity represent more than just numbers, so we go beyond this to ensure that the wider area also benefits from the communities we create;

- Thakeham schemes are design and infrastructure-led; engaging with statutory authorities and other stakeholders from the start of a project. This facilitates the delivery of physical, social and green/blue infrastructure which benefits the wider area, as well as new residents.
- We seek to increase our residents' connection to nature, working closely with charities such as Surrey Wildlife Trust and Plantlife to increase their awareness and understanding of the natural world.
- We engage local primary schools with our award-winning educational initiative, 'Eddie & Ellie's Wild Adventures' to promote the importance of ecology and biodiversity, delivering National Curriculum linked activities and early career-based learning.
- Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality, and reduces carbon emissions.
- Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (one tonne of MacRebur mix contains the equivalent of 80,000 plastic bottles), as well as products part of a circular economy.
- Having gold membership with the Supply Chain Sustainability School, we ensure that our whole supply chain is as local as possible.
- On site, we monitor and aim to minimise construction travel emissions, construction waste and energy consumption.
- Thakeham is registered with the Considerate Constructors Scheme.

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Response to consultation

Thakeham has been promoting the Site throughout the emerging plan-making process and has submitted significant amounts of evidence to support a residential allocation for circa 10 dwellings in this location.



Indicative Masterplan (from supporting Vision Document)

In addition to the above, the Council has also considered the Site as part of two larger strategic allocations across the south of Four Marks.

Land Availability Assessment (LAA) & Integrated Impact Assessment (IIA)

As part of the preparation of Local Plan 2021-2040, the Site was assessed in the LAA under reference LAA/FM-005, where suitability for development has been assessed against existing constraints, and identified the following: countryside character, near groundwater protection zone, SINC on northern boundary, and is close proximity to listed buildings and boundary of South Downs National Park (SDNP). We address these points below and set out why they should not be considered a barrier to housing provision in Four Marks.

SDNP

Whilst the SDNP boundary is in close proximity to the eastern edge of the Site, it currently abuts the existing housing on the eastern side of Telegraph Lane. Therefore, the principle of housing adjacent to this edge of the SDNP already exists, which creates the view into the village.

In any event, our Site has been designed to minimise impact on the SDNP through our sympathetic landscape proposals that retain the existing trees and hedgerows and ensure that the proposed homes are in keeping with the scale and massing of the existing houses along Telegraph Lane.

Landscape and Countryside Character

Whilst Four Marks is rural in its setting, the Site is surrounded by residential development on all sides along Telegraph Lane and Alton Lane. The Site is also directly adjacent to the settlement boundary, with additional residential development further south and west of the Site. Accordingly, the Site cannot be considered to be truly rural in nature and forms the natural final developable area in the south east corner of the settlement to be built out.

Heritage Assets

Thakeham prepared a pre-application submission in March 2023 and subsequently received formal feedback from the Council through a letter under reference 60040/999.

Within this, the Council has affirmed that the proposed dwellings will be adequately distanced from the listed building and effectively screened by the existing vegetation. Consequently, it is asserted that Thakeham's existing proposal would bring no adverse impact on the setting of the building.

Sites of Importance for Nature and Conservation (SINC)

A full Preliminary Ecological Appraisal has been undertaken at the Site which has identified the potential for Dormice and reptiles, with the verge and hedgerow along the Alton Lane frontage being designated as a Road Verge of Importance and SINC due to the presence of violet helleborine. These factors have therefore required a layout and design that is sensitive to these primary ecological constraints.

In response to this, we have retained the single access points along Telegraph Lane and Alton Lane to serve the proposed development. The scheme has incorporated provision of Dormice bridges and additional planting to reinforce the existing hedgerow structures as a form of mitigation.

As a consequence, we would advise the Council that this has been suitably mitigated.

Groundwater Protection

The Site is situated in close proximity to a groundwater protection zone, necessitating the implementation of a suitable drainage strategy. Consultations have been conducted with the Local Lead Flood Authority (LLFA), appropriate soakaways to ensure there is no adverse impact on the groundwater.

In light of the above, Thakeham believe the aforementioned constraints are not fundamental and can easily be mitigated, therefore, the Site should be included as a draft site allocation.

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Indeed, the assessment found that the Site is developable for 18 dwellings and should be included in the assessment under the IIA.

The Site has also been considered as part of two larger sites: Four Marks South (LAA/FM-031 for circa 390 dwellings), and Land at Four Marks, south (LAA/FM-042 for 860 dwellings). The IIA concludes that both of these are of a scale that is not appropriate for a settlement such as Four Marks which is a Tier 3 settlement.

However, the IIA made no such recommendation to reject the standalone site (Ref. LAA/FM-005). Accordingly, the Site should be included as an allocation within the emerging Plan.

The Integrated Impact Assessment was undertaken across all submitted sites in the district, and assesses the suitability of sites against 12 objectives for the Local Plan, which are set out in the table below:

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

Table 1: East Hampshire Integrated Impact Assessment Objectives

Thakeham agrees that these objectives are an appropriate measure to assess potential development Sites against to ensure Sites meet the needs of the Local Plan.

Each objective has been graded from significant positive effect, through mixed effect to significant negative effect as well as negligible to ensure sites are in accordance with the requirements of the Local Plan.

For the purposes of these representations, we are not commenting on the IIA of the larger strategic sites, as we are not promoting the Site as part of a wider opportunity, but as a standalone proposal for circa 10 dwellings.

Accordingly, our assessment solely looks at the assessment of the Site (Ref. LAA/FM-005) and our reasoning as to why it accords with the objectives for the Local Plan, and should therefore be identified a housing allocation in the emerging Local Plan.

Thakeham agrees with the conclusions of the assessment regarding objectives 1, 6, 8, 9 and 12, which confirm the Site would have positive effects. However, we make the following points against the remaining objectives:

Objective 2: negligible effect against carbon emissions and achieving net zero.

As set out in all our previously submitted representations, as well as confirmation in the attached Vision Document, all houses will be zero carbon ready through sustainable construction as well as solar panels, air source heat pumps, measures to reduce water consumption and fast electric vehicle charging points. This will ensure all homes are resilient against and ready to adapt for climate change in the future.

*Proposed amendment to assessment: **significant positive effect against this objective.***

Objective 3: negligible effect on adaption and resilience to climate change

As set out above and in all our previously submitted representations, as well as confirmation in the attached Vision Document, all houses will be zero carbon ready through sustainable construction as well as solar panels, air source heat pumps, measures to reduce water consumption and fast electric vehicle charging points. This will ensure all homes are resilient against and ready to adapt for climate change in the future.

*Proposed amendment to assessment: **significant positive effect against this objective.***

Objective 4: major negative effect against accessibility and well-integrated communities

The Site has scored negatively due to an apparent low score in the Ridge Accessibility Assessment. Table 5.2 assesses each sites accessibility to facilities within 10 min walk or cycle equally across six criteria. It should be noted that the Site performs well against all criteria except 'working'. Four Marks is a Tier 3 settlement, which is defined in the Local Plan as only providing facilities to meet some of the everyday needs of local residents. It is therefore to be expected that the Site would not perform strongly against the 'working' criteria as there is little provision for jobs in the area. If this criterion is removed, or re-weighted, the Site performs much more strongly. With regard to integration, development of the Site as set out in the indicative Masterplan would complete the form of development that continues south along Telegraph Lane and west along Alton Lane.

*Proposed amendment to assessment: **minor positive effects against this objective***

Objective 7: uncertain effect against built and cultural heritage assets

There is a single listed building to the east of the Site, with no other heritage assets nearby. Alongside the retention of existing trees and hedgerows along the eastern boundary, our proposals include softened edges to minimise impact. Furthermore, the layout of homes follows the existing pattern of development along Telegraph Lane, as shown on the indicative masterplan above, ensuring the setting is not negatively impacted.

*Proposed amendment to assessment: **negligible effects against this objective***

Objective 10: major negative effect against efficient and sustainable use of natural resources

It appears that of 219 sites assessed against this objective, only 16 sites do not have a negative effect (7% of all sites). This appears to suggest that nearly all development would have a negative impact against the district's natural resources. It should be noted that Thakeham has a strong track record of sustainable construction, as well as our commitment to carbon neutral construction in the near future. Our Sustainable Procurement Policy encourages the use of

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recycled materials, such as otherwise nonrecyclable waste plastics (one tonne of MacRebur mix contains the equivalent of 80,000 plastic bottles), as well as products part of a circular economy, which will further ensure we reduce our impact on natural resources.

*Proposed amendment to assessment: **negligible effects against this objective***

Objective 11: minor negative effect against water resource management

Thakeham acknowledges the important role that housing has to play in future water usage and consumption. It is why we are at the forefront of water consumption studies and solutions, using at least 5 litres less per home per day than existing housing stock and we continue to seek ways of reducing daily usage further, which will be reflected in future construction.

*Proposed amendment to assessment: **major positive effects against this objective***

In light of the above, Thakeham supports the methodology used for the LAA and IIA, but suggests that the assessment should be updated to take account of current and previous representations and associated information we have submitted for this site, which shows that the Site performs extremely strongly against all the main objectives of the Local Plan. A summary of the previous assessment, as well as the proposed amended findings are set out in the table below:

	IIA Objective											
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12
2023 IIA Findings	+	0	0	--	+/-	++	?	+	+	--	-	0
Thakeham Updated	+	++	++	+	+/-	++	0	+	+	+/-	++	0

Table 2: Summary of findings and updated assessment

This shows the Site performs favourably against the objectives of the Local Plan and should be considered as an updated housing allocation going forwards.

Draft Local Plan Allocation and comment

Thakeham supports the Council’s position that Four Marks is a sustainable location for development in East Hampshire with access to facilities, but also provides good access to the open countryside. It is also acknowledged that there are few physical constraints in the area.

Whilst the Council has acknowledged delivery of 69 dwellings between 2021 and 2023, as well as identified three new sites for housing in Four Marks, comprising 210 new homes up to 2040, this does not support the levels of growth in Four Marks. At 2001, the census data showed a population of 3,602. At 2011, the census data showed a population of 4,067 (an increase of 465 or 12.9%). At 2021, this had increased by 1,550 (a further 27.5% increase) to 5,617. This shows a population increase in Four Marks of between 13% and 27% every ten years. However, the provision of 269 new homes over the Plan period would result in expected growth of 3.6% over 19 years. This is clearly not sufficient housing to accommodate growth across Four Marks and additional sites must be identified to accommodate the likely future need.

As set out above, Thakeham has been promoting land at to Land west of Telegraph Lane and south of Alton Lane, Four Marks throughout the plan-making process. The Site has already

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been assessed positively in the LAA, and as set out above, also performs strongly against the IIA.

In light of the above, Thakeham can confirm that the Site is:

- Suitable – the Council’s assessments and Draft Local Plan confirm this is a suitable location for development;
- Available – The Site is fully under our control and can come forward early in the plan period;
- Deliverable – as shown within the attached Vision Document, we have already worked up a deliverable scheme informed by a suite of studies identifying constraints and opportunities.

Accordingly, the Site is an appropriate allocation to provide necessary housing for the residents of East Hampshire.

Conclusion

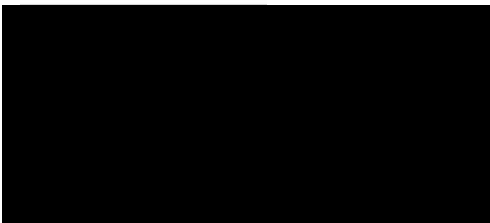
In light of the continued growth of Four Marks as a settlement, whilst only providing a nominal amount of new homes here, it is necessary to identify and allocate significant additional housing here.

This representation, together with the submitted Vision Document, demonstrates why the Site is suitable for development, available and deliverable immediately, is viable for housing development and how the constraints identified previously can be mitigated accordingly through high quality design.

We trust that this is taken into account in the process going forward and we would be grateful for confirmation of receipt.

We look forward to engaging in a constructive dialogue and contributing positively to the planning process. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully,



Appendix 1 – Thakeham General Reps to Regulation 18 Draft Plan consultation
Appendix 2 – Vision Document

Appendix 1 – Thakeham General Reps to Regulation 18 Draft Plan consultation

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THAKEHAM

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

4 March 2024

Dear Sir / Madam,

East Hampshire Local Plan 2021 – 2040: Regulation 18 Draft Local Plan Consultation Thakeham Homes General Representations

Introduction

Thakeham Homes Limited ('Thakeham') is writing in respect of the East Hampshire Regulation 18 Draft Local Plan Consultation ('Reg 18 Draft') prepared by East Hampshire District Council ('EHDC').

Overall, Thakeham is supportive of the aspirations of the Regulation 18 Draft Local Plan, particularly the Council's sustainability aspirations, around net zero carbon, Biodiversity Net Gain and the creation of sustainable communities; which are wholly aligned with Thakeham's values. Furthermore, we support the inclusion of the residential allocation for Land south of Five Heads Road, Horndean (Site Allocation HDN2) for 118 homes

However, there are some policies that require amendment to ensure deliverability of the Plan's objectives, crucially delivering against housing needs. Thakeham agrees with the Council's calculation of the Standard Method, which is 578 dwellings per annum (dpa) or 10,982 over the Plan Period. We also appreciate the difficulties arising within National Parks. However, it is unlikely that the South Downs National Park Authority will be able to meet its own housing needs given the level of protection for National Parks, we therefore submit that the Plan underestimates the level of residual unmet need and the contribution that is made towards this unmet need should be higher.

We submit in light of the above, EHDC should allocate further sites for residential use, and Thakeham respectfully asks EHDC to reconsider the assessments of the following suitable/available/achievable and deliverable sites:

- Land north of Alton Lane, Four Marks – c.90 homes
- Land south of Telegraph Lane and east of Alton Lane, Four Marks – c.10 homes

Individual representations are made in relation to each of these sites, including a Vision Document for each, demonstrating how these sites could be brought forwards to meet both local and district housing needs.

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Response to consultation

Thakeham has reviewed the consultation documents and provides comments on the relevant policies below. However, the first point to note is the proposed timescales to adoption of this Local Plan at Figure 1.4 of the consultation document, which suggest the Council can have an adopted Plan by Summer 2025, some 15 months from now.

Whilst Thakeham supports the Council's willingness to push forwards to an adoption, we believe the timescales are overly optimistic. We therefore set out anticipated timescales for each stage as well as an updated timetable below:

- Consideration of responses to Reg 18 Draft Plan consultation (6 months);
- Preparation and Council sign-off of Reg 19 consultation (3 months);
- Reg 19 consultation (1.5 months);
- Consideration or responses to Reg 19 consultation and prep of submission (3 months);
- Submit Plan to SoS (1 day);
- PINS prep time and average time from submission to EiP (6 months);
- Examination in Public (1 month);
- Inspector considers interim advice after EiP (0.5 months);
- Main Modifications prep and consultation (6 months);
- Inspectors Final Report (1 month);
- Council sign-off and adoption of Local Plan (1 month).

In light of the above, the process from this stage is still likely to take 30 months, which would suggest a more realistic timetable of:

- November-December 2024 – Public consultation on Reg 19 Submission Plan
- March 2025 – Submit Local Plan for Examination
- September-October 2025 – Examination in Public
- June/July 2026 – Planning Inspector's Report
- September 2026 – Adopt the Local Plan

Policy S1 'Spatial Strategy'

Draft Policy S1 outlines the spatial strategy for the Local Plan over the period 2021-2040, with aims to deliver a total of 9,082 new homes at 478 dwellings per annum. In light of the comments above, about the Plan taking a year longer to reach adoption, we would recommend the Local plan period is extended to run 2021-2041 to account for the additional time.

Thakeham notes that the total housing numbers proposed over the plan period do not account for meeting any unmet need from other LPA areas other than the South Downs National Park (SDNP). Furthermore, the Plan makes an assumption based on the likely unmet need arising from the National Park. It is likely that there will be a need for higher housing numbers than suggested and suggest that ongoing liaison with the South Downs National Park Authority, who are also undertaking a review of their Local Plan, would quantify the level of unmet need which would need to be accommodated by EHDC.

In addition to the above, Paragraph 9.18 of Policy H1 'Housing Strategy' states that *“there needs to be some allowance for flexibility and to allow for sites allocated not coming forward during the Plan Period. Therefore, sites capable of supplying a further 10-15% should be allocated to create a buffer”*.

Assuming the 9,082 dwelling requirement is correct, this would require a total provision of between 9,990 homes (10%) and 10,444 homes (15%) across the plan period. Considering the current supply of 6,225 dwellings this would require the allocation of between 3,765 and 4,219 dwellings in new allocations. However, the Council is only proposing to allocation sites for 3,443 dwellings, which would result in a shortfall of between 322 and 776 dwellings across the plan period.

To ensure the Plan is as robust as possible when considered at Examination, we recommend additional sites are identified to address the shortfall.

Policy S2 'Settlement Hierarchy'

Thakeham supports the identification of a settlement hierarchy as the focus for development within the settlements, this ensures that development is directed to the most sustainable locations. The policy also suggests all settlements have a Settlement Policy Boundary, with proposed amendments to the boundary to reflect development.

We support this position with regards the proposed Tier 1 and Tier 2 settlements. However, we note that the Four Marks settlement boundary does not extend to the existing housing down Telegraph Lane, nor does it include any of the housing along Alton Lane, despite these forming part of the built form of Four Marks, both on plan and on the ground. It is therefore recommended that the settlement boundary for Four marks is re-drawn to extend down Telegraph Lane and along Alton Lane.

Furthermore, we note that Four Marks has been demoted to a Tier 3 settlement when it was previously considered a Tier 2 settlement in the previous local plan, there is no justification for this. Given Four Marks includes all the main services, such as shops, restaurants, pubs, healthcare and community facilities, schools and sports clubs, this settlement provides significant services for a wider area and should therefore be retained as a Tier 2 settlement.

Policy CLIM 1 'Tackling the Climate Emergency'

Thakeham is committed to helping to tackle the climate emergency through sustainable construction, net zero carbon homes, delivering in excess of Government mandated 10% biodiversity net gain and reducing water consumption. Indeed, Thakeham was the UK's first housebuilder to sign the SME Climate Commitment, joining the UN's Race To Zero campaign. Accordingly, we are fully supportive of the Council's ambitions to tackle the climate emergency.

However, we note CLIM1.1 appears to be an aspiration rather than specific policy. It is therefore recommended that this paragraph is removed from the policy wording.

Policy CLIM 2 ‘Net Zero Carbon Development: Operational Carbon’

Thakeham supports the approach to seeking net zero carbon and net zero carbon ready homes and is proposing to build these types of development across our sites in East Hampshire.

It is advised that the Council should provide a margin of error to enable flexibility to the estimates for the development’s whole life cycle highlighted in draft policy CLIM3.2.

It is noted that the Council has not provided definition and clarity to “*the risks associated with a changing climate*” as stated in draft policy CLIM5.1, we therefore recommend that the Council provides further specification detail of all of the anticipated risks as a list in bullet point form under the sub-policy in order to avoid confusion.

While these policies demonstrate a commendable commitment to addressing climate change, it is essential to balance environmental objectives with the economic viability of housing developments. We would advocate for ongoing discussions with the Council to strike a balance that supports sustainable practices while maintaining the feasibility of housing development.

Natural and Built Environment

Thakeham places great importance on protecting the natural environment and this is demonstrated in our portfolio of landscape-led developments which prioritises green and blue infrastructure, delivering net biodiversity gain and support local wildlife.

Policy NBE2 and NBE3 ‘Biodiversity’

Draft policy NBE2 and NBE3 together outline a set of criteria which only permits development proposals where it can be demonstrated that there would be no adverse impact on designated wildlife sites, protection and enhancement of priority species and priority habitats, achievement of at least 10% biodiversity net gain. This aligns with Thakeham’s sustainability commitments and we consider that there is the potential for all development to aspire to providing in addition of the 10% BNG required in the Environment Act 2021.

Policy NBE4 to NBE6 ‘Nutrient Neutrality’

Thakeham recognises that nutrient neutrality is a widespread issue across the UK and East Hampshire is one of the many authorities which are affected by this. Draft policy NBE6 and NBE9 sets out mitigation methods which may include a financial contribution, a developer-provided package of measures to avoid or mitigate effects on the SPAs, or a combination of both. We acknowledge that EHDC has produced the ‘East Hampshire position statement and mitigation plan’ to assist with planning applications and therefore recommend the Council to consider providing reference to this mitigation plan within the policy to ensure consistency.

Policy NBE7 ‘Managing Flood risk’

We consider that draft policy NBE7 sets out a systematic approach to flood risk assessment and management within housing development and are thus in support of this policy. Thakeham

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welcomes the inclusion of policy NBE7.4 which recognises the multiple functions SuDs features have for amenity, open space and biodiversity.

Policy NBE8 ‘Water quality, supply and efficiency’

Thakeham supports the desire to reduce water consumption as set out in policy NBE8.4 by stipulating a standard of no more than 95 litres per person per day. Thakeham welcomes the acknowledgement that seeking to achieve this may have impacts on scheme deliverability and should therefore be considered holistically alongside other requirements and considered on a site by site basis.

Policy NBE10 ‘Landscape’

In Thakeham’s portfolio of proposals, we have consistently strived for clear emphasis on conserving and enhancing the special characteristics and visual amenity of local landscapes. While this has previously posed some challenges, particularly on suitable sites with complex topography, Thakeham has consulted with the relevant stakeholders and landscape consultants to create aesthetically pleasing and environmentally sensitive projects that align with the community’s values. This draft policy NBE10 encourages developers to adopt a landscape-led approach, which we support and are committed to pursuing.

Policy NBE11 ‘Gaps between settlements’

Thakeham supports the Council’s objective of preserving the distinctive characteristics individual towns and villages each have their own unique characteristics and that their separate identity is maintained. However, we would suggest gaps between settlements is subjective and a more appropriate way of achieving individuality of settlements would be through a policy that seeks the protection of settlements from coalescence.

Policy NDE12 ‘Green and Blue Infrastructure’

Thakeham supports the objective and policy direction of draft policy NBE12, requiring the retention, protection and enhancement of the existing green and blue infrastructure assets, links and the overall multifunctional network.

Thakeham also agrees with the Council’ demonstration of flexibility and its allowance for negotiations in cases where on-site provision is not feasible.

It is also appreciated that the Council has referred to the East Hampshire Green Infrastructure Strategy, GI Framework Urban Greening Factor Standard and Natural England’s GI Principles which offer additional guidance in this context.

Policy DES1 ‘Well-Designed Places’

As a sustainable place-maker and community creator, Thakeham supports the Council’s Vision for new development to be well designed as set out under the objectives outlined in draft policy DES1. We commend the Council’s for raising the bar on placemaking. However, the policy

should be more flexibly worded to acknowledge the ability of small sites to contribute towards the criteria listed in the policy

Policy DES3 ‘Residential Density and Local Character’

Thakeham supports good design that is of appropriate density and character to the locality, however, it is also important to promote the efficient use of land. The appropriate density of new development should be considered on a site by site basis, taking into account the character of the area but also the ability to make best use of land which reduces the number of sites that are needed to meet housing needs. It is not considered appropriate to fix, through policy, the density of development at the range of nearby development as this may not meet this objective and is unable to account for local character; it should be reworded to enable greater flexibility.

Policy HWC1 ‘Health and Wellbeing of Communities’

As a founding member of the NHS Healthy New Towns programme, Thakeham fully recognises healthy and active lifestyles can be encouraged via provision of active design principles, sustainable travel, access to green infrastructure and local community facilities in new development.

All Thakeham developments are designed around putting health and wellbeing at the heart of the community, and we support the provisions identified at Policy HWC1.1.

However, Policy HWC1.2 suggests all development over 50 units should provide a Health Impact Assessment in support of any application. Thakeham propose that this policy is unnecessary as the Council should have already undertaken a HIA as part of its assessment of suitable sites for allocation in the Local Plan. Therefore, the requirement to provide a further HIA on sites that have already been assessed by the Council would be repetitive, add additional cost to developer applications, and result in additional workload for planning case officers.

Accordingly, we recommend Policy HWC1.2 is removed.

Policy DCG1 ‘Infrastructure’

Thakeham is an infrastructure-led developer, whereby we deliver our infrastructure commitments, delivering early in the construction process to ensure usability by the residents when they are ready to move in. Therefore, we support the Council’s aspiration to deliver the right infrastructure for developments.

However, Policy DCG1.2 states that *‘Development proposals must consider all the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.’* This is expanded further at paragraph 8.18, which states that developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both onsite off site to site to serve the development. It should be noted that the capacity of the sewage network is not a land use planning matter for consideration on an application by

application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991).

In light of this, Policy DGC1.2 should be re-worded by removing 'not just those', so it relates to infrastructure considerations of the site and immediate vicinity only.

Policy H1 'Housing Strategy'

Thakeham supports the focus of new development within the most sustainable and accessible locations as outlined in the settlement hierarchy. However, Draft policy H1 notes that there is provision made for 'about 3,500 new homes' in the plan period. However, this does not account for the requirements set out at Paragraph 9.18, which suggest there should be a buffer of between 10-15% in order to allow for sites allocated not coming forward during the Plan Period.

In order to achieve this, the Council must therefore seek to allocate between 3,765 and 4,219 dwellings, which is significantly more than the 3,443 dwellings currently identified. This may also require additional housing when working with SDNP to help deliver on their unmet need. Alton is already taking a significant amount in this plan period, and it is therefore suggested that additional allocations should be located within Tier 2 and Tier 3 settlements.

Policy H2 'Housing Mix and Type'

Thakeham is a place-maker and community creator, which requires a mixture of people to ensure our developments work. As part of this, we provide homes to meet all needs, whether it is market or affordable housing, for first time buyers, families or downsizers.

Policy H2.4 states a 'proportion of affordable dwellings to be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3)' but does not define the expected provision. Similar policies elsewhere propose a 5% delivery of affordable homes to be M4(3), which would be a reasonable option to insert here. In its current format, the policy is unclear and is open to interpretation and debate, which risks no provision on a number of sites.

Policy H3 'Affordable Housing'

Thakeham supports the Council's aspiration to meet the needs of all its residents through the inclusion of affordable housing policy.

At Thakeham, we pride ourselves that we have always delivered policy compliant schemes and always met council policy. We have never resorted to a viability exercise to shirk our responsibility to deliver affordable homes. Accordingly, we support the Council's target of delivering 40% affordable housing for all sites of 10 dwellings or more.

We are concerned that the proposals to deliver 70% of all affordable housing as affordable rent, with 30% other affordable home ownership products is too rigid. There is no mechanism to review the 70% if Registered Providers can justify a higher percentage of affordable ownership requirements in an area. Therefore, the policy should be amended to suggest the starting position will be 70% affordable rent and 30% others, but alternatives can be agreed with the Local Authority if justifiable.

Summary and Conclusions

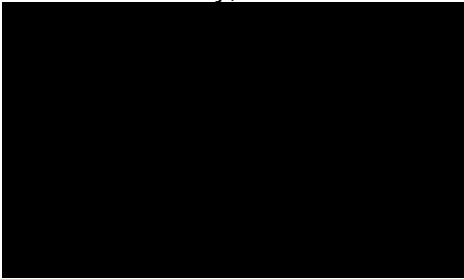
Overall, Thakeham is supportive of the Regulation 18 Draft local Plan, in particular the aims and objectives of the Plan as well as the allocation of land south of Five Heads Road, Horndean for residential development.

However, as set out against Policy S1 above, significant additional allocations are required to support the necessary uplift in housing need beyond those already identified. In order to help the Council, Thakeham proposes the inclusion of the following suitable/available/achievable and deliverable sites:

- Land north of Alton Lane, Four Marks – c.90 homes
- Land south of Telegraph Lane and east of Alton Lane, Four Marks – c.10 homes

We trust that these representations are useful and clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any further queries or require any further information.

Yours faithfully,





THAKEHAM



*Land at Telegraph Lane,
Four Marks*

Vision Document

March 2024

c.10 new homes proposed in a highly sustainable and unconstrained location on the edge of Four Marks



Contents

- 04 Introduction to the Site
- 06 Site masterplan
- 08 Delivering a sustainable community
- 10 More than housing: homes for all
- 12 Leaving nature better than we found it
- 14 Health & wellbeing
- 16 Active travel, sustainable transport
- 18 Placemaking & designing beautiful





Introduction to the site

A new development, with community wellbeing and forward thinking sustainability practices at its heart.

Thakeham is known for designing and building beautiful, well-integrated places, where communities can thrive. By letting the natural landscape and environment lead the way and championing a connected community, our vision for Telegraph Lane, Four Marks offers a unique opportunity for sustainable homes in the District of East Hampshire.

From preserving and enhancing the natural environment to connecting into walking and cycling routes to the existing village facilities, we will place the health and wellbeing of the community and the environment front and centre. Fulfilling our commitment to provide high quality housing that serves a diverse range of needs, within a green natural environment.

THE DEVELOPMENT AT TELEGRAPH LANE, FOUR MARKS WILL INCLUDE:



c.10 sustainable homes



Landscape improvements, including 10% biodiversity net gain

Site masterplan

- 1 Biodiverse landscape area
- 2 Enhance/reinforce trees and hedgerows to improve habitats and provide landscape screening
- 3 New hedgerows and tree planting to provide screening and remove impact on SDNP (South Downs National Park) and countryside to north of Telegraph Lane
- 4 Homes in keeping with existing houses in terms of scale and form along Telegraph Lane and Alton Lane
- 5 All homes will be sustainable
- 6 New vehicular access point proposed in the same location as the existing gated access





Delivering a sustainable community

We are raising the bar on sustainable living. Nationally, we are leading the way here, well ahead of other major UK housebuilders.

How are we achieving this? Each new home at Telegraph Lane, Four Marks will combine the highest quality and energy efficient building methods and will benefit from the most sustainable renewable domestic technology. This means that as well as being sustainably constructed, homes may also feature solar panels, rainwater harvesting, fast electric vehicle charging points and more.

When it comes to sustainable community creation, we lead the way nationally. Telegraph Lane, Four Marks would represent an important next step in our commitments here. Thakeham was the UK's first housebuilder to sign the SME Climate Commitment, joining the UN's Race To Zero campaign.



Thakeham has been a certified carbon neutral business since 2023.





THAKEHAM PROPOSALS FOR TELEGRAPH LANE, FOUR MARKS INCLUDES:

- Up to 10 new homes to enable more people to stay in Four Marks

We believe that diversity in community is one of its greatest assets, enabling people to come together and interact.

TELEGRAPH LANE, FOUR MARKS WILL OFFER MORE THAN JUST HOUSING, WE WILL DELIVER:

- Homes for market sale that can be flexible and adapted
- Homes for families to grow in and put down local roots
- Home for downsizers to enjoy a more relaxed lifestyle

*More than housing:
homes for all*





*Leaving nature
better
than we found it*

LETTING LANDSCAPE LEAD

Our approach to landscape-led placemaking involves working with, rather than against, the existing natural environment. We will respect and protect the local landscape, to create a carefully considered development which integrates with nature whilst connecting people with their surroundings.

By giving priority to existing green spaces, we can deliver a minimum of 10% biodiversity net gain, supporting local wildlife. Protecting biodiverse green spaces supports people and nature, building more resilience to the increasing extremes of nature – winter storms, summer heat waves and local air pollution.

A NET GAIN FOR BIODIVERSITY

Our proposal for Telegraph Lane, Four Marks will deliver a minimum of 10% biodiversity net gain in accordance with legislation and local policy. We will also support additional habitat creation through the use of swift bricks, hedgehog highways and bird and bat boxes. This means there will be a demonstrable overall improvement in natural habitats and nature locally.

We will support the local environment by:

- Preserving and protecting valuable existing habitat
- Enhancing existing habitats through good management practices for now and the future
- Delivering a swift brick for every home on the development



A CONNECTED COMMUNITY

We believe nature should be protected – not ring fenced. The best biodiverse developments create places abundant with wildlife and natural beauty whilst providing people with the opportunity to connect with it.



Swift brick



Hedgehog hole



Bird house & bug hotel



Putting health & wellbeing at the heart of the community

As placemakers, we recognise our responsibility to create spaces that support happier, healthier lives.

Our immediate environment plays a significant role in our mood, health, short and long term outcomes. So wellbeing is at the heart of our vision for sustainable development and community creation.

Our landscape strategy informs the masterplan, and includes the retention of all trees on site as well as 95% of the existing hedgerows. In addition, there will be significant new trees, hedgerow and grassland planting across the site, making for a greener outlook.



Thakeham believes that well-planned communities have the power to change lives for the better.





Access from Telegraph Lane to the Village Centre ensures that all the facilities are within a 16-minute walk or 4-minute bicycle ride, making this a sustainable location for development that embraces the “20-minute neighbourhood” principles and prioritising walking and cycling as the primary means of getting around.

*Active travel,
sustainable transport*





Placemaking & designing beautiful

We don't just build houses. We're placemakers – committed to creating extraordinary new places, with the highest attention to detail and always designing and building beautiful places and homes.

Telegraph Lane, Four Marks represents an opportunity to deliver a development which showcases our core expertise and focus – sustainable development and cohesive communities. And from the quality of our construction to our social responsibilities, we always go the extra mile.

A Thakeham development will always be an asset to its surroundings and the local community. We strive to enhance the quality of life for everyone in the community, not just the people who buy our homes. And we're always aiming for higher environmental standards, both on our developments and in our own working practices.

From sponsoring local community sports teams to a recruitment strategy that includes local apprenticeships throughout the entire lifecycle of a development. As a socially responsible developer, we make a positive contribution to the lives of local communities.

At every stage, Thakeham's approach supports a lasting legacy – for people, place and planet.



At Thakeham, we have an opportunity and a duty to create amazing places; we are driven by a passion to deliver a legacy for many to enjoy and that we are proud of.

Rob Boughton,
CEO of Thakeham



THAKEHAM

For further information, contact: info@thakeham.com

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THAKEHAM

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

4 March 2024

Dear Sir / Madam,

East Hampshire Local Plan 2021 – 2040: Regulation 18 Draft Local Plan Consultation Land south of Five Heads Road, Horndean

Introduction

Thakeham Homes Limited ('Thakeham') is writing in response to the East Hampshire Regulation 18 Draft Local Plan Consultation ("Reg 18 Draft") prepared by East Hampshire District Council ('EHDC'), specifically in relation to our Land South of Five Heads Road, Horndean, hereafter referred to as "the Site".

Thakeham has interests in a number of other locations in East Hampshire and various representations have therefore been produced in respect of these interests, including a more general representation on wider Regulation 18 Draft Plan aspects, which should be read alongside this representation and are appended for ease of reference.

About Thakeham

Thakeham is a pioneering community creator at the forefront of placemaking in the UK. We deliver top quality developments, designed for sustainable living and firmly rooted in community values. Our industry-leading focus on building net zero carbon homes and cohesive, empowered neighbourhoods has led us to become a leading homebuilder in the south of England. We're proud to bring quality homes, infrastructure and amenities together to help people and planet thrive.

At Thakeham, we create amazing places to live – for generations today and in the years to come. Our approach sets us apart from our competitors, ensuring at every stage that we leave a legacy behind that everyone can be proud of.

Thakeham designs all homes to reflect the character of the area, using materials of the highest quality, and be tenure-blind, building the affordable homes to same quality and exterior specification as the market homes.

Whether it's building net zero carbon homes, water efficiency and biodiversity stewardship or supporting active travel solutions and community-owned assets, we take a holistic, forward thinking approach to placemaking by establishing more resilient developments. Climate

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change, nature recovery, people and communities lie at the heart of our sustainability strategy. As a Thakeham is part of the Future Homes Hub, the organisation leading an industry roadmap to achieve environmental goals, we're committed to delivering on industry-leading sustainability goals.

From 2025, all new Thakeham homes will be net zero carbon, meaning that emissions from heating, lighting and cooling will be zero or below. We will also continue to measure the embodied carbon emissions from our homes, including across the supply chain, to create a baseline from which to reduce embodied carbon across the construction process as much as possible.

Since 2020, we've consistently gone beyond Part L building regulation targets for carbon emissions. Equipping homes with increased insulation, PV panels, air source heat pumps (where possible), electric vehicle charging points, hedgehog highways and nesting boxes for swifts and bats.

We are also committed to providing a biodiversity net gain of at least 10% on our developments, in many cases exceeding this, and are proud to be a Planet Mark-certified carbon neutral business and the official sustainability partner for England Netball.

However, we understand that sustainability and biodiversity represent more than just numbers, so we go beyond this to ensure that the wider area also benefits from the communities we create;

- Thakeham schemes are design and infrastructure-led; engaging with statutory authorities and other stakeholders from the start of a project. This facilitates the delivery of physical, social and green/blue infrastructure which benefits the wider area, as well as new residents.
- We seek to increase our residents' connection to nature, working closely with charities such as Surrey Wildlife Trust and Plantlife to increase their awareness and understanding of the natural world.
- We engage local primary schools with our award-winning educational initiative, 'Eddie & Ellie's Wild Adventures' to promote the importance of ecology and biodiversity, delivering National Curriculum linked activities and early career-based learning.
- Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality, and reduces carbon emissions.
- Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (one tonne of MacRebur mix contains the equivalent of 80,000 plastic bottles), as well as products part of a circular economy.
- Having gold membership with the Supply Chain Sustainability School, we ensure that our whole supply chain is as local as possible.
- On site, we monitor and aim to minimise construction travel emissions, construction waste and energy consumption.
- Thakeham is registered with the Considerate Constructors Scheme.

Response to consultation

Thakeham has engaged with the Council across all previous plan-making consultations in relation to the preparation of East Hampshire's Local Plan 2021-2040. The Reg 18 Draft Plan was published in January 2024 and has included the Site as a potential draft allocation under draft policy HDN2. Thakeham supports the inclusion of the Site to help EHDC meet the housing needs in the district.

An updated Vision Document is submitted alongside the written representations to demonstrate that the site is available, deliverable, suitable and viable for and should be allocated for 118 dwellings to be delivered early in the emerging plan period.



Indicative Masterplan (from supporting Vision Document)

Prior Assessments: Land Availability Assessment (LAA) & Integrated Impact Assessment (IIA)

As part of the preparation of Local Plan 2021-2040, the Site was assessed in the LAA under reference LAA/HD-004, where suitability for development has been assessed against existing constraints, and identified the following: countryside character, surface water flood risk on western part, groundwater protection zone, listed buildings nearby, Tree Protection Order on southern boundary, long distance views from the north of the Site and pylons and electric cables crossing the site and sensitivity to deep drilling.

Detailed independent assessments have been undertaken to assess these constraints and have been submitted to the Council in support of the current planning application (Ref. 60033). Taking each identified constraint in turn, the findings of these assessments are:

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- Cannon Consulting Flood Risk Assessment concludes that surface water runoff is managed into infiltration basins that provide a suitable level of treatment for residential use;
- Geo-Environmental Ground Risk Assessment concludes that no groundwater was encountered on site;
- Genesis Planning & Heritage Assessment confirms that the proposals do not conflict with the requirements of Policy CP30;
- TGA Arb consultants confirm that development proposals are in accordance with BS5837:2012 'Trees in relation to design, demolition and construction – Recommendations';
- David Jarvis LVIA concludes that visibility of the site is limited and the SDNP would experience no effect as a result of development.

Given the aforementioned constraints are not fundamental and can easily be mitigated, the Site has been included as a draft site allocation as it is deemed able to “promote accessibility and create well-integrated communities” based on the Ridge accessibility study.

An Integrated Impact Assessment has been undertaken across all submitted sites in the district, and assesses the suitability of sites against 12 objectives for the Local Plan, which are set out in the table below:

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

Table 1: East Hampshire Integrated Impact Assessment Objectives

Thakeham agrees that these objectives are an appropriate measure to assess potential development Sites against to ensure Sites meet the needs of the Local Plan.

Each objective has been graded from significant positive effect, through mixed effect to significant negative effect as well as negligible.

Thakeham agrees with the conclusions of the assessment regarding objectives 2, 4, 5, 6 and 8, which confirm the site would have positive effects. However, would make the following points against the remaining objectives:

Objective 1: uncertain effect against biodiversity.

As set out in previously submitted representations and the ecology report submitted in support of the current planning application, as well as confirmation in the attached Vision Document the proposals are able to deliver at least 10% biodiversity net gain, in line with the Environment Act.

Proposed amendment to assessment: significant positive effect against this objective.

Objective 3: negligible effect on adaption and resilience to climate change

As set out in all our previously submitted representations, as well as confirmation in the attached Vision Document, all houses will be zero carbon ready through sustainable construction as well as solar panels, air source heat pumps, measures to reduce water consumption and fast electric vehicle charging points. This will ensure all homes are resilient against and ready to adapt for climate change in the future.

Proposed amendment to assessment: significant positive effect against this objective.

Objective 7: uncertain effect against built and cultural heritage assets

The heritage assets, including listed buildings and conservation area lie to the north west of the Site. Alongside the retention of existing trees and hedgerows along the northern and western boundaries, our proposals include communal green spaces and softened edges to northern boundary to minimise impact. Furthermore, all homes along the northern boundary are side facing to reduce the impact of the built form and protect landscape views.

Proposed amendment to assessment: negligible effects against this objective

Objective 9: minor negative effect against character of landscape and townscape

As with objective 7 above, proposals have been specifically designed to mitigate any impact of the landscape character. the retention of existing trees and hedgerows along the northern and western boundaries, our proposals include communal green spaces and softened edges to northern boundary to minimise impact. Furthermore, all homes along the northern boundary are side facing to reduce the impact of the built form and protect landscape views.

Proposed amendment to assessment: negligible effects against this objective

Objective 10: major negative effect against efficient and sustainable use of natural resources

It appears that of 219 sites assessed against this objective, only 16 sites do not have a negative effect (7% of all sites). This appears to suggest that nearly all development would have a negative impact against the district's natural resources. It should be noted that Thakeham has a strong track record of sustainable construction, as well as our commitment to carbon neutral construction in the near future. Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (one tonne of MacRebur mix contains the equivalent of 80,000 plastic bottles), as well as products part of a circular economy, which will further ensure we reduce our impact on natural resources.

Proposed amendment to assessment: negligible effects against this objective

Objective 11: minor negative effect against water resource management

Thakeham acknowledges the important role that housing has to play in future water usage and consumption. It is why we are at the forefront of water consumption studies and solutions, using at least 5 litres less per home per day than existing housing stock and we continue to seek ways of reducing daily usage further, which will be reflected in future construction.

*Proposed amendment to assessment: **major positive effects against this objective***

In light of the above, Thakeham supports the methodology used for the LAA and IIA but suggests that the assessment should be updated to take account of current and previous representations and associated information we have submitted for this site, which shows that the Site performs extremely strongly against all the main objectives of the Local Plan. A summary of the previous assessment, as well as the proposed amended findings are set out in the table below:

	IIA Objective											
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12
2023 IIA Findings	?	++	0	+	++	++	?	+	-	--	-	0
Thakeham updated	++	++	++	+	++	++	0	+	0	+/-	++	0

Table 2: Summary of findings and updated assessment

Draft Local Plan Allocation and comment

Thakeham supports the inclusion of Site Allocation HDN2 – Land South of Five Heads Road, within the emerging Local Plan for 118 residential homes and agrees with the summary of reasons for inclusion that any environmental constraints can be avoided or mitigated. However, it should also be noted that development will also include further improvements to biodiversity through net gain.

Thakeham supports the Council’s position that Horndean is one of the major settlements in East Hampshire with access to key facilities, including schools, shops, healthcare and community facilities, but also provides good access to the open countryside. It is also acknowledged that there are few physical constraints in the area.

In addition, Thakeham supports the summary of infrastructure requirements for the Site that there is no requirement for education and new vehicular, walking and cycling access onto Catherington Lane will be provided into the existing network.

In light of the above, Thakeham can confirm that the Site is:

- Suitable – the Council’s assessments and Draft Local Plan confirm this is a suitable location for development;
- Available – The Site is fully under our control and can come forward early in the plan period;
- Deliverable – as shown within the attached Vision Document, we have already worked up a deliverable scheme informed by a suite of studies identifying constraints and opportunities.

Accordingly, the Site is an appropriate allocation to provide necessary housing for the residents of East Hampshire.

Conclusion

Thakeham supports the Council's identification of Land South of Five Heads Road, Horndean as a residential allocation in the emerging local plan and is in general support of the methodology proposed for assessing sites. However, as set out above, sites should be assessed against the objectives in line with information submitted in consultation documents, which in this case would show the Site is an appropriate, sustainable allocation that fully accords with the objectives of the emerging Plan.

We trust that these representations are clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully,



Appendix 1 – Thakeham General Reps to Regulation 18 Draft Plan consultation
Appendix 2 – Vision Document

Appendix 1 – Thakeham General Reps to Regulation 18 Draft Plan consultation

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THAKEHAM

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

4 March 2024

Dear Sir / Madam,

East Hampshire Local Plan 2021 – 2040: Regulation 18 Draft Local Plan Consultation Thakeham Homes General Representations

Introduction

Thakeham Homes Limited ('Thakeham') is writing in respect of the East Hampshire Regulation 18 Draft Local Plan Consultation ('Reg 18 Draft') prepared by East Hampshire District Council ('EHDC').

Overall, Thakeham is supportive of the aspirations of the Regulation 18 Draft Local Plan, particularly the Council's sustainability aspirations, around net zero carbon, Biodiversity Net Gain and the creation of sustainable communities; which are wholly aligned with Thakeham's values. Furthermore, we support the inclusion of the residential allocation for Land south of Five Heads Road, Horndean (Site Allocation HDN2) for 118 homes

However, there are some policies that require amendment to ensure deliverability of the Plan's objectives, crucially delivering against housing needs. Thakeham agrees with the Council's calculation of the Standard Method, which is 578 dwellings per annum (dpa) or 10,982 over the Plan Period. We also appreciate the difficulties arising within National Parks. However, it is unlikely that the South Downs National Park Authority will be able to meet its own housing needs given the level of protection for National Parks, we therefore submit that the Plan underestimates the level of residual unmet need and the contribution that is made towards this unmet need should be higher.

We submit in light of the above, EHDC should allocate further sites for residential use, and Thakeham respectfully asks EHDC to reconsider the assessments of the following suitable/available/achievable and deliverable sites:

- Land north of Alton Lane, Four Marks – c.90 homes
- Land south of Telegraph Lane and east of Alton Lane, Four Marks – c.10 homes

Individual representations are made in relation to each of these sites, including a Vision Document for each, demonstrating how these sites could be brought forwards to meet both local and district housing needs.

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Response to consultation

Thakeham has reviewed the consultation documents and provides comments on the relevant policies below. However, the first point to note is the proposed timescales to adoption of this Local Plan at Figure 1.4 of the consultation document, which suggest the Council can have an adopted Plan by Summer 2025, some 15 months from now.

Whilst Thakeham supports the Council's willingness to push forwards to an adoption, we believe the timescales are overly optimistic. We therefore set out anticipated timescales for each stage as well as an updated timetable below:

- Consideration of responses to Reg 18 Draft Plan consultation (6 months);
- Preparation and Council sign-off of Reg 19 consultation (3 months);
- Reg 19 consultation (1.5 months);
- Consideration or responses to Reg 19 consultation and prep of submission (3 months);
- Submit Plan to SoS (1 day);
- PINS prep time and average time from submission to EiP (6 months);
- Examination in Public (1 month);
- Inspector considers interim advice after EiP (0.5 months);
- Main Modifications prep and consultation (6 months);
- Inspectors Final Report (1 month);
- Council sign-off and adoption of Local Plan (1 month).

In light of the above, the process from this stage is still likely to take 30 months, which would suggest a more realistic timetable of:

- November-December 2024 – Public consultation on Reg 19 Submission Plan
- March 2025 – Submit Local Plan for Examination
- September-October 2025 – Examination in Public
- June/July 2026 – Planning Inspector's Report
- September 2026 – Adopt the Local Plan

Policy S1 'Spatial Strategy'

Draft Policy S1 outlines the spatial strategy for the Local Plan over the period 2021-2040, with aims to deliver a total of 9,082 new homes at 478 dwellings per annum. In light of the comments above, about the Plan taking a year longer to reach adoption, we would recommend the Local plan period is extended to run 2021-2041 to account for the additional time.

Thakeham notes that the total housing numbers proposed over the plan period do not account for meeting any unmet need from other LPA areas other than the South Downs National Park (SDNP). Furthermore, the Plan makes an assumption based on the likely unmet need arising from the National Park. It is likely that there will be a need for higher housing numbers than suggested and suggest that ongoing liaison with the South Downs National Park Authority, who are also undertaking a review of their Local Plan, would quantify the level of unmet need which would need to be accommodated by EHDC.

In addition to the above, Paragraph 9.18 of Policy H1 'Housing Strategy' states that *“there needs to be some allowance for flexibility and to allow for sites allocated not coming forward during the Plan Period. Therefore, sites capable of supplying a further 10-15% should be allocated to create a buffer”*.

Assuming the 9,082 dwelling requirement is correct, this would require a total provision of between 9,990 homes (10%) and 10,444 homes (15%) across the plan period. Considering the current supply of 6,225 dwellings this would require the allocation of between 3,765 and 4,219 dwellings in new allocations. However, the Council is only proposing to allocation sites for 3,443 dwellings, which would result in a shortfall of between 322 and 776 dwellings across the plan period.

To ensure the Plan is as robust as possible when considered at Examination, we recommend additional sites are identified to address the shortfall.

Policy S2 'Settlement Hierarchy'

Thakeham supports the identification of a settlement hierarchy as the focus for development within the settlements, this ensures that development is directed to the most sustainable locations. The policy also suggests all settlements have a Settlement Policy Boundary, with proposed amendments to the boundary to reflect development.

We support this position with regards the proposed Tier 1 and Tier 2 settlements. However, we note that the Four Marks settlement boundary does not extend to the existing housing down Telegraph Lane, nor does it include any of the housing along Alton Lane, despite these forming part of the built form of Four Marks, both on plan and on the ground. It is therefore recommended that the settlement boundary for Four marks is re-drawn to extend down Telegraph Lane and along Alton Lane.

Furthermore, we note that Four Marks has been demoted to a Tier 3 settlement when it was previously considered a Tier 2 settlement in the previous local plan, there is no justification for this. Given Four Marks includes all the main services, such as shops, restaurants, pubs, healthcare and community facilities, schools and sports clubs, this settlement provides significant services for a wider area and should therefore be retained as a Tier 2 settlement.

Policy CLIM 1 'Tackling the Climate Emergency'

Thakeham is committed to helping to tackle the climate emergency through sustainable construction, net zero carbon homes, delivering in excess of Government mandated 10% biodiversity net gain and reducing water consumption. Indeed, Thakeham was the UK's first housebuilder to sign the SME Climate Commitment, joining the UN's Race To Zero campaign. Accordingly, we are fully supportive of the Council's ambitions to tackle the climate emergency.

However, we note CLIM1.1 appears to be an aspiration rather than specific policy. It is therefore recommended that this paragraph is removed from the policy wording.

Policy CLIM 2 ‘Net Zero Carbon Development: Operational Carbon’

Thakeham supports the approach to seeking net zero carbon and net zero carbon ready homes and is proposing to build these types of development across our sites in East Hampshire.

It is advised that the Council should provide a margin of error to enable flexibility to the estimates for the development’s whole life cycle highlighted in draft policy CLIM3.2.

It is noted that the Council has not provided definition and clarity to “*the risks associated with a changing climate*” as stated in draft policy CLIM5.1, we therefore recommend that the Council provides further specification detail of all of the anticipated risks as a list in bullet point form under the sub-policy in order to avoid confusion.

While these policies demonstrate a commendable commitment to addressing climate change, it is essential to balance environmental objectives with the economic viability of housing developments. We would advocate for ongoing discussions with the Council to strike a balance that supports sustainable practices while maintaining the feasibility of housing development.

Natural and Built Environment

Thakeham places great importance on protecting the natural environment and this is demonstrated in our portfolio of landscape-led developments which prioritises green and blue infrastructure, delivering net biodiversity gain and support local wildlife.

Policy NBE2 and NBE3 ‘Biodiversity’

Draft policy NBE2 and NBE3 together outline a set of criteria which only permits development proposals where it can be demonstrated that there would be no adverse impact on designated wildlife sites, protection and enhancement of priority species and priority habitats, achievement of at least 10% biodiversity net gain. This aligns with Thakeham’s sustainability commitments and we consider that there is the potential for all development to aspire to providing in addition of the 10% BNG required in the Environment Act 2021.

Policy NBE4 to NBE6 ‘Nutrient Neutrality’

Thakeham recognises that nutrient neutrality is a widespread issue across the UK and East Hampshire is one of the many authorities which are affected by this. Draft policy NBE6 and NBE9 sets out mitigation methods which may include a financial contribution, a developer-provided package of measures to avoid or mitigate effects on the SPAs, or a combination of both. We acknowledge that EHDC has produced the ‘East Hampshire position statement and mitigation plan’ to assist with planning applications and therefore recommend the Council to consider providing reference to this mitigation plan within the policy to ensure consistency.

Policy NBE7 ‘Managing Flood risk’

We consider that draft policy NBE7 sets out a systematic approach to flood risk assessment and management within housing development and are thus in support of this policy. Thakeham

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welcomes the inclusion of policy NBE7.4 which recognises the multiple functions SuDs features have for amenity, open space and biodiversity.

Policy NBE8 ‘Water quality, supply and efficiency’

Thakeham supports the desire to reduce water consumption as set out in policy NBE8.4 by stipulating a standard of no more than 95 litres per person per day. Thakeham welcomes the acknowledgement that seeking to achieve this may have impacts on scheme deliverability and should therefore be considered holistically alongside other requirements and considered on a site by site basis.

Policy NBE10 ‘Landscape’

In Thakeham’s portfolio of proposals, we have consistently strived for clear emphasis on conserving and enhancing the special characteristics and visual amenity of local landscapes. While this has previously posed some challenges, particularly on suitable sites with complex topography, Thakeham has consulted with the relevant stakeholders and landscape consultants to create aesthetically pleasing and environmentally sensitive projects that align with the community’s values. This draft policy NBE10 encourages developers to adopt a landscape-led approach, which we support and are committed to pursuing.

Policy NBE11 ‘Gaps between settlements’

Thakeham supports the Council’s objective of preserving the distinctive characteristics individual towns and villages each have their own unique characteristics and that their separate identity is maintained. However, we would suggest gaps between settlements is subjective and a more appropriate way of achieving individuality of settlements would be through a policy that seeks the protection of settlements from coalescence.

Policy NDE12 ‘Green and Blue Infrastructure’

Thakeham supports the objective and policy direction of draft policy NBE12, requiring the retention, protection and enhancement of the existing green and blue infrastructure assets, links and the overall multifunctional network.

Thakeham also agrees with the Council’ demonstration of flexibility and its allowance for negotiations in cases where on-site provision is not feasible.

It is also appreciated that the Council has referred to the East Hampshire Green Infrastructure Strategy, GI Framework Urban Greening Factor Standard and Natural England’s GI Principles which offer additional guidance in this context.

Policy DES1 ‘Well-Designed Places’

As a sustainable place-maker and community creator, Thakeham supports the Council’s Vision for new development to be well designed as set out under the objectives outlined in draft policy DES1. We commend the Council’s for raising the bar on placemaking. However, the policy

should be more flexibly worded to acknowledge the ability of small sites to contribute towards the criteria listed in the policy

Policy DES3 ‘Residential Density and Local Character’

Thakeham supports good design that is of appropriate density and character to the locality, however, it is also important to promote the efficient use of land. The appropriate density of new development should be considered on a site by site basis, taking into account the character of the area but also the ability to make best use of land which reduces the number of sites that are needed to meet housing needs. It is not considered appropriate to fix, through policy, the density of development at the range of nearby development as this may not meet this objective and is unable to account for local character; it should be reworded to enable greater flexibility.

Policy HWC1 ‘Health and Wellbeing of Communities’

As a founding member of the NHS Healthy New Towns programme, Thakeham fully recognises healthy and active lifestyles can be encouraged via provision of active design principles, sustainable travel, access to green infrastructure and local community facilities in new development.

All Thakeham developments are designed around putting health and wellbeing at the heart of the community, and we support the provisions identified at Policy HWC1.1.

However, Policy HWC1.2 suggests all development over 50 units should provide a Health Impact Assessment in support of any application. Thakeham propose that this policy is unnecessary as the Council should have already undertaken a HIA as part of its assessment of suitable sites for allocation in the Local Plan. Therefore, the requirement to provide a further HIA on sites that have already been assessed by the Council would be repetitive, add additional cost to developer applications, and result in additional workload for planning case officers.

Accordingly, we recommend Policy HWC1.2 is removed.

Policy DCG1 ‘Infrastructure’

Thakeham is an infrastructure-led developer, whereby we deliver our infrastructure commitments, delivering early in the construction process to ensure usability by the residents when they are ready to move in. Therefore, we support the Council’s aspiration to deliver the right infrastructure for developments.

However, Policy DCG1.2 states that *‘Development proposals must consider all the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.’* This is expanded further at paragraph 8.18, which states that developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both onsite off site to site to serve the development. It should be noted that the capacity of the sewage network is not a land use planning matter for consideration on an application by

application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991).

In light of this, Policy DGC1.2 should be re-worded by removing 'not just those', so it relates to infrastructure considerations of the site and immediate vicinity only.

Policy H1 'Housing Strategy'

Thakeham supports the focus of new development within the most sustainable and accessible locations as outlined in the settlement hierarchy. However, Draft policy H1 notes that there is provision made for 'about 3,500 new homes' in the plan period. However, this does not account for the requirements set out at Paragraph 9.18, which suggest there should be a buffer of between 10-15% in order to allow for sites allocated not coming forward during the Plan Period.

In order to achieve this, the Council must therefore seek to allocate between 3,765 and 4,219 dwellings, which is significantly more than the 3,443 dwellings currently identified. This may also require additional housing when working with SDNP to help deliver on their unmet need. Alton is already taking a significant amount in this plan period, and it is therefore suggested that additional allocations should be located within Tier 2 and Tier 3 settlements.

Policy H2 'Housing Mix and Type'

Thakeham is a place-maker and community creator, which requires a mixture of people to ensure our developments work. As part of this, we provide homes to meet all needs, whether it is market or affordable housing, for first time buyers, families or downsizers.

Policy H2.4 states a 'proportion of affordable dwellings to be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3)' but does not define the expected provision. Similar policies elsewhere propose a 5% delivery of affordable homes to be M4(3), which would be a reasonable option to insert here. In its current format, the policy is unclear and is open to interpretation and debate, which risks no provision on a number of sites.

Policy H3 'Affordable Housing'

Thakeham supports the Council's aspiration to meet the needs of all its residents through the inclusion of affordable housing policy.

At Thakeham, we pride ourselves that we have always delivered policy compliant schemes and always met council policy. We have never resorted to a viability exercise to shirk our responsibility to deliver affordable homes. Accordingly, we support the Council's target of delivering 40% affordable housing for all sites of 10 dwellings or more.

We are concerned that the proposals to deliver 70% of all affordable housing as affordable rent, with 30% other affordable home ownership products is too rigid. There is no mechanism to review the 70% if Registered Providers can justify a higher percentage of affordable ownership requirements in an area. Therefore, the policy should be amended to suggest the starting position will be 70% affordable rent and 30% others, but alternatives can be agreed with the Local Authority if justifiable.

Summary and Conclusions

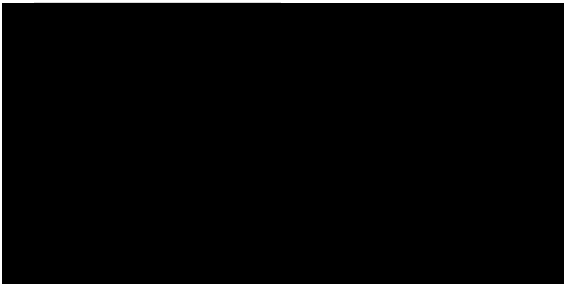
Overall, Thakeham is supportive of the Regulation 18 Draft local Plan, in particular the aims and objectives of the Plan as well as the allocation of land south of Five Heads Road, Horndean for residential development.

However, as set out against Policy S1 above, significant additional allocations are required to support the necessary uplift in housing need beyond those already identified. In order to help the Council, Thakeham proposes the inclusion of the following suitable/available/achievable and deliverable sites:

- Land north of Alton Lane, Four Marks – c.90 homes
- Land south of Telegraph Lane and east of Alton Lane, Four Marks – c.10 homes

We trust that these representations are useful and clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any further queries or require any further information.

Yours faithfully,





THAKEHAM

*Land South of Five Heads Road,
Horndean*

Vision Document

February 2024

c.118 zero carbon ready homes together with associated access, drainage, landscaping and open space proposed in a highly sustainable and unconstrained location on the edge of Horndean



Contents

- 04 Introduction to the Site
- 08 Site masterplan
- 10 Delivering as a partnership in Horndean
- 12 Delivering a zero carbon ready community
- 14 More than housing: the right homes for Horndean
- 16 Enhancing the natural environment
- 18 Putting health & wellbeing at the heart of the community
- 20 Promoting sustainable & active travel
- 22 Placemaking & designing beautiful





Introduction to the site

A zero carbon ready development, with community wellbeing, active travel and forward thinking sustainability practices at its heart.

Thakeham is known for designing and building beautiful, well-integrated places, where communities can thrive. By letting the natural landscape and environment lead the way and championing a connected community, our vision for Land South of Five Heads Road, Horndean offers a unique opportunity for sustainable, zero carbon ready living in the District of East Hampshire.

From preserving and enhancing the natural environment to creating well-supported walking and cycling routes to new local facilities, we will place the health and wellbeing of the community and the environment front and centre. Fulfilling our commitment to provide high quality housing that serves a diverse range of needs, within a green and blue, natural environment.

THE DEVELOPMENT AT LAND SOUTH OF FIVE HEADS ROAD, HORNDEAN WILL INCLUDE:



c. 118 homes, with 40% affordable housing meeting the affordable homes policy



A mix of housing to support generational needs; from first time buyers, to families and the older population



A forward thinking sustainable travel strategy – part of the development's foundational infrastructure



Provision of pedestrian and cycle routes to encourage sustainable and healthy lifestyle



Play areas to support outdoor exercise and socialising



Open spaces and landscape improvements, including a minimum of 10% BNG



The Vision

Thakeham's vision for the site is to create a landscape-led, people focussed community. This will be achieved by integrating the design with the existing landscape, combining landscape infrastructure, sustainable homes and quality public realm.





OPPORTUNITIES:

The following opportunities have been identified:

The Site is situated on the edge of the settlement of Horndean, with existing residential development immediately abutting the eastern and southern boundaries of the Site.

Set back development from Catherington Lane to respect the gap between settlements, the setting of the Conservation Area and to ensure the area at risk of flooding remains undeveloped.

Field boundary hedgerows and existing mature trees will be retained where possible and supplemented by new planting to provide a green setting.

Introduce new open green spaces for public use.

Provide and enhance landscape buffers to neighbouring properties to the south and east. Development set back from boundaries ensuing protection of residential amenity and protection of off-site Tree Preservation Orders trees.

Explore ped connectivity by creating new linkages.

Nutrient Neutrality mitigation to be provided on-site. Potential for surplus land being provided as open space.

CONSTRAINTS:

The following constraints have been identified:

Two electricity cables cross the Site from northeast to west supported by two pylons in the centre of the Site.

Catherington Conservation Area is to the northwest of the Site which includes three Grade II Listed Buildings.

Small area of surface water flooding in western part of site.

Several trees within rear gardens of properties on Bridle Path are subject to a Tree Preservation Order (TPO).

Open views into the Site from the north and west.

Sensitive boundary to the east, where there is little screening from neighbouring properties.

Small no-build zone to the east due to underground services.

Within Solent Special Protection Area catchment for wastewater where Nutrient Neutrality will be required.

Site masterplan

Provision of c.118 zero carbon ready homes including 40% affordable housing on-site provision



- 1 Clearly defined communal green spaces
- 2 Landscape buffers to Site boundaries
- 3 Softened edge to northern boundary
- 4 Potential for larger homes along southern boundary to respond to existing properties

- 5 Looser built form along the northern edge to reduce the impact of proposed housing and protect landscape views
- 6 Locally Equipped Area for Play (LEAP) on eastern boundary adjacent to Five Heads Road

- 7 Local Area for Play (LAP) located centrally
- 8 Tree lined avenue with integrated swales leading through the communal green spaces
- 9 Integrated pedestrian and cycle linkages

- 10 SUDS features integrate green and blue infrastructure
- 11 Retained open space, preserving the gap between Horndean and Catherington



Thakeham seeks to engage with local residents early in the development process to ensure site designs reflect the requirements for the existing as well as the new community.

In advance of any application, Thakeham looks to engage with residents, community stakeholders and representatives to understand their thoughts and aspirations for the local area.

For Land South of Five Heads Road, Horndean, Thakeham has already engaged with the local community through in-person public exhibitions and Parish Council meetings. Our proposals have evolved to take on board feedback received at all stages.



*Delivering as a partnership
in Horndean*





*Delivering a
zero carbon
ready community*



*Thakeham has been
a verified carbon
neutral business
since 2023.*

We are raising the bar on sustainable living. All homes at Land South of Five Heads Road, Horndean, will be zero carbon ready. Nationally, we are leading the way here, well ahead of other major UK housebuilders.

How are we achieving this? Each new home at Land South of Five Heads Road, Horndean, will combine the highest quality and energy efficient building methods and will benefit from the most sustainable renewable domestic technology. This means that as well as being sustainably constructed, homes may also feature solar panels, air source heat pumps, measures to reduce water consumption, and fast electric vehicle charging points for all homes.

All homes will have easy access to green open spaces, as active travel routes for walking and cycling will connect onto the existing network facilities. This will ensure sustainable travel options to local facilities such as schools, community hubs, medical facilities, local employment and sports provision – lowering local emissions as well as creating an attractive place to live, prioritising the physical and mental health of all residents.

When it comes to zero carbon ready community creation, we lead the way nationally. Land east of Catherington Lane, Horndean would represent an important next step in our commitments here. Thakeham was the UK's first housebuilder to sign the SME Climate Commitment, joining the UN's Race To Zero campaign.





*More than housing:
the right homes
for Horndean*



Thakeham delivers sustainable and mixed communities with affordable housing at the heart of all our developments.

Throughout our history, we've always delivered policy-compliant schemes and always met council policy. We've never resorted to a viability exercise to shirk our responsibility to deliver affordable homes – and we never will.

We are already delivering homes as a trusted partner for housing associations and local authorities across the South East.

OUR PROPOSAL FOR LAND SOUTH OF FIVE HEADS ROAD, HORNDEAN INCLUDES:

- Up to 47 affordable homes for local people - meeting the Council's policy of 40% affordable homes.
- Affordable homes which provide a mix of tenures to meet local need and align with Government policy
- Tenure blind affordable homes, built to exactly the same quality and external finish as the private homes and distributed around the development to create a genuinely mixed community.
- All homes delivered will be zero carbon ready– tackling both the climate emergency and cost of living crisis.

We believe that diversity in community is one of its greatest assets, enabling people to come together and interact.

LAND SOUTH OF FIVE HEADS ROAD, HORNDEAN WILL OFFER MORE THAN JUST HOUSING, WE WILL DELIVER:

- Homes for market sale in a range of sizes and types
- Homes for first time buyers to begin their journey as homeowners
- A range of affordable housing tenures for people on the housing register
- Homes for families to grow in and put down local roots
- Homes for downsizers to enjoy a more relaxed lifestyle



LETTING LANDSCAPE LEAD

Our approach to landscape-led placemaking involves incorporating the existing natural assets, as well as protecting landscape views, to create a carefully considered development which integrates naturally into the wider landscape and enhances local connectivity.

The places we create give priority to green spaces, delivering biodiversity net gain and supporting local wildlife whilst also enhancing social interaction, health and well-being.

A CONNECTED COMMUNITY

We believe nature should be protected – not ring-fenced. The best biodiverse developments create places abundant with wildlife and natural beauty whilst providing people with the opportunity to connect with it. Communities gain from the mental, physical and social benefits green spaces and waterways provide, at the same time as becoming more invested in the ongoing protection of a treasured local landscape.

A NET GAIN FOR BIODIVERSITY

Our proposal for Land South of Five Heads Road, Horndean will deliver a minimum of 10% biodiversity net gain in accordance with legislation and local policy. We will also support additional habitat creation through the use of swift bricks, hedgehog highways and bird and bat boxes. This means there will be a demonstrable overall improvement in natural habitats and nature locally.

We will support the local environment by:

- Preserving and protecting valuable existing habitat
- Enhancing existing habitats through good management practices for now and the future
- Creating new biodiverse habitats that go beyond formal commitments – such as swift bricks, hedgehog highways in fences and bird and bat boxes in new buildings

Enhancing the natural environment





Putting health & wellbeing at the heart of the community



As placemakers, we recognise our responsibility to create spaces that support happier, healthier lives.

Our immediate environment plays a significant role in our mood, health, short and long term outcomes. So wellbeing is at the heart of our vision for sustainable development and community creation.

Whether creating employment opportunities, homes or educational spaces, we believe that well-planned communities have the power to change lives for the better. Land South of Five Heads Road will provide homes for local people as well as open space to encourage outdoor socialising and wellbeing.

Guided by the NHS Healthy New Town principles and a commitment to zero carbon placemaking, this neighbourhood would be a gateway to healthy lifestyles and well-being. With improvements to sustainable transport networks and green spaces woven into its very foundations, insular car-centric travel will be reduced, bringing communities back into contact and connection. Abundant opportunities for healthy outdoor recreational activities around shared open spaces will add to this sense of wellbeing and cohesion.

Our vision represents a blend of health, wellbeing and productivity – setting a new benchmark in terms of what sustainable placemaking can provide.



Promoting sustainable & active travel

By considering the way people move, interact, work and play, we will balance the location of facilities and infrastructure (both new and existing) to meet daily needs and reduce the need for travel as well as delivering a range of sustainable travel options to encourage residents out of the private car; utilising public transport, walking and cycling.

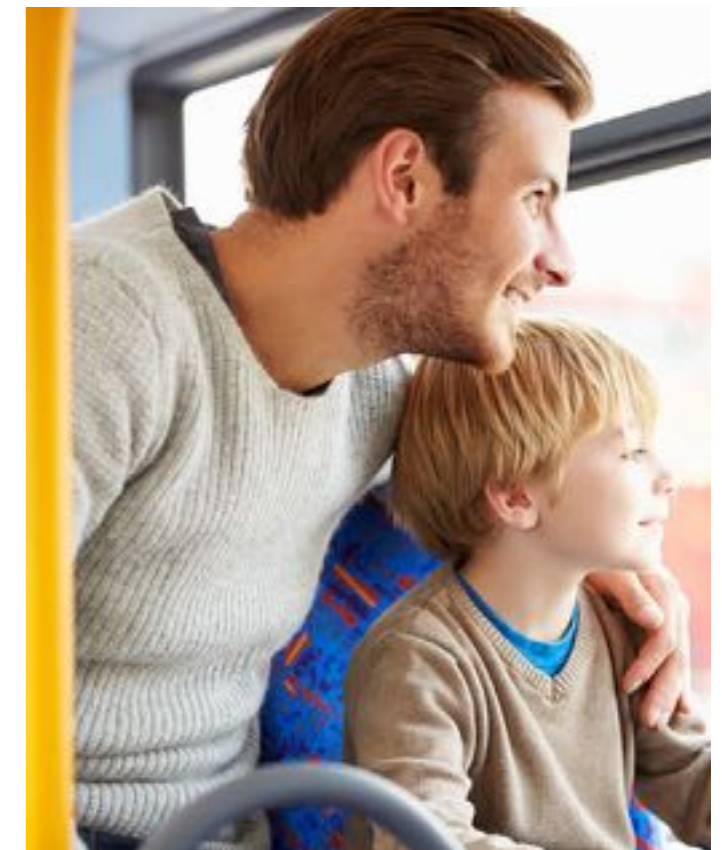
Recognising and embracing the walking and cycling neighbourhood principles, we will make it easy for residents to default to walking and cycling as their primary means of getting around. Shops, schools, community facilities and places of employment are all within easy reach, by foot, bike or public transport. We will deliver this infrastructure at the earliest opportunity to influence patterns of behaviour from the outset.

The environmental impact of private cars will be reduced, but beyond that, communities will be more connected to their landscape, and to each other.

WE'LL SUPPORT THIS WITH SEVERAL SCHEMES, INCLUDING:

- Pedestrian and cycle access from both Catherington Lane and Five Heads Road feeding into a well-connected and permeable layout through the Site, with on-site open space
- Walking and cycling routes to have priority crossing over vehicles
- Electric vehicle charging points and easily accessible secure cycle storage

Sustainable transport solutions are a top priority for our developments. To achieve the best outcomes, we work collaboratively with several transport providers, including the Urban Mobility Partnership (a consortium of Enterprise, Brompton, Next Bike, Stagecoach and First Group).





Placemaking & designing beautiful

We don't just build houses. We're placemakers – committed to creating extraordinary new places, with the highest attention to detail and always designing and building beautiful places and homes.

Land South of Five Heads Road, Horndean represents an opportunity to deliver a development which showcases our core expertise and focus – sustainable development and cohesive communities. And from the quality of our construction to our social responsibilities, we always go the extra mile.

A Thakeham development will always be an asset to its surroundings and the local community. We strive to enhance the quality of life for everyone in the community, not just the people who buy our homes. And we're always aiming for higher environmental standards, both on our developments and in our own working practices.

From sponsoring local community sports teams to a recruitment strategy that includes local apprenticeships throughout the entire lifecycle of a development. As a socially responsible developer, we make a positive contribution to the lives of local communities.

At every stage, Thakeham's approach supports a lasting legacy – for people, place and planet.



At Thakeham, we have an opportunity and a duty to create amazing places; we are driven by a passion to deliver a legacy for many to enjoy and that we are proud of.

Rob Boughton,
CEO of Thakeham





THAKEHAM

For further information, contact: info@thakeham.com

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From: [REDACTED]
Sent: 04 March 2024 17:04
To: [EHDC - Local Plan](#)
Cc: [REDACTED]
Subject: Turnberry Consulting obo Redbrown Farms Limited - Draft Local Plan 2021-2040 Reg 18B Consultation
Attachments: [EHDC Reg 18B 040324 SPF.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 Sir/Madam,

I write in respect of the above consultation.

Please find attached our consultation response sent on behalf of Redbrown Farms Limited.

Please also see link for the following supporting information:

Land North of London Road - Vision Document (Nov. 2023)
Land North of London Road - Transport Technical Note (March 2024)

[REDACTED]

I'd be grateful if you could confirm receipt, including the supporting attachments. Please advise if these should be submitted via another method.

Best regards

[REDACTED]

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

Turnberry

Our ref:
Your ref: EHDC 240304 SPF

4th March 2024

Dear Sir/Madam,

Response to the consultation on the Draft Local Plan 2021-2040 (Regulation 18).

I write on behalf of Redbrown Limited to respond on the Draft Local Plan, which opened for public consultation on 22nd January 2024.

This representation should be read alongside the enclosed Vision Document and supporting Transport Technical Note.

Redbrown Limited and the Froyle Estate

Redbrown Limited are an agricultural business which owns and farms the Froyle Estate, hereafter referred to as 'the estate'. The estate was acquired in December 2020 when Belport purchased on behalf of Redbrown Limited the agricultural holdings of Froyle Estate, which extends to approximately 1,200 hectares between Alton and Farnham. Redbrown Limited have a long term commitment to farming the estate, and has invested heavily in the farm infrastructure and facilities since acquiring the estate.

Land North of London Road

Whilst Redbrown Limited are a farming business, they have noted the development potential of a parcel of land within the estate, which is situated in a highly sustainable location on the edge of Holybourne, north of London Road.

As you will be aware from our previous correspondence with the Council, Redbrown Limited are promoting the land for a high quality neighbourhood comprising 223 dwellings, open space and community facilities.

Sustainable Location

The site is close to the town of Alton. Alton railway station is a 35-minute walk away, offering departures every 30 minutes to London Waterloo Station (the station can also be accessed in seven minutes via the existing 206 bus route from Bonhams Close or five minutes by car). Within Alton town centre (a 30-minute walk, a nine-minute bus journey using the 206 service or a five-minute car journey from the site), there are a number of good services and facilities including GPs, a large business park, gyms, supermarkets, restaurants and shops. The site is also near the A31 which offers strategic transport links to the M3. Within Holybourne itself there are a good range of services to meet day-to-day needs including a village shop, a primary school and a secondary school.

Vision

Redbrown Limited are an important stakeholder in the area, and will be an active and engaged neighbour to the village over the long-term. To this end, the landowners want to adopt a 'landowner legacy' approach to the proposed development. This comprises a commitment to high quality design and long-term stewardship, respecting the landscape capacity of the site and the character of the village of Holybourne. Please see enclosed the Vision document which has previously been submitted to the Council.

Transport & Access

Redbrown Limited has appointed transport planning adviser, Paul Basham Associates (PBA), to survey the existing transport conditions surrounding the Site, assess the expected traffic movements generated by the proposed development and the impact that would have upon the surrounding network. The report dated February 2024 is submitted in support of these representations.

With regard to the existing conditions on the network the surveys confirmed the following:

“During the AM peak period (08:00-09:00) the maximum queue length on London Road (N) and Montecchio Way was 13 and the maximum queue on London Road (W) was 9.

During the recorded PM peak period (15:45-16:45) the maximum queue length on London Road (N) was 15, Montecchio Way was 13 and the maximum queue on London Road (W) was 13.

During the network PM peak period (17:00-18:00) the maximum queue length on London Road (N) was 13, Montecchio Way was 11 and the maximum queue on London Road (W) was 11.

Although there was an increase in traffic during these time periods, queues were clearing through the junction during the green light cycles. There is no evidence to indicate the junction is operating over capacity, with the queues simply a consequence of a signal controlled junction.” (Paragraphs 4.8 to 4.11, emphasis added)

The report specifically considered the implications of school pick up and drop offs for highway capacity and congestion, and advised the following:

*“The survey results suggest that traffic increases by c50% for a 15-minute period before returning to normal. However, as shown within the queue length survey and from commentary from the auditor, all cars waiting at the lights cleared in one green light cycle. **Therefore, there is no evidence to support an existing capacity issues associated with London Road or with the operation of the London Road/Montecchio Way junction.**”* (Paragraph 5.23, emphasis added)

Within the context of this survey work, the report assessed the impacts of the proposed development upon the capacity of the London Road and advised the following:

*“The addition of 61 southwest bound movements (not including those which will come from the north of London Road and turn into the site) in the AM peak the traffic flows along London Road would increase by 38% and the addition of 23 southwest bound movements in the PM peak the traffic flows along London Road would increase by 27%. **The addition of 61 southwest bound movements in the AM peak equates to one additional vehicle per minute and the additional 23 southwest bound vehicles movements in the PM peak equate to an additional vehicle movement every 2-3 minutes.**”* (Paragraph 7.27, emphasis added)

“The addition of 23 northeast bound movements (not including those which will turn to travel north of London Road from the site) in the AM peak the traffic flows along London Road would increase by an additional vehicle movement every 2-3 minutes

and in the PM peak an addition of 53 northeast bound movements would equate to an additional vehicle movement every 1-2-minutes.”(Paragraph 7.30, emphasis added)

In respect of the capacity of the London Road/Montecchio Way junction the report advises the following:

“In the AM peak, the proposed development traffic would see an increase in 81 vehicle movements at the London Road/Montecchio Way junction. At present that junction sees a total of 1559 vehicle movements through the junction during this time period. Therefore, the proposed development would see an increase in 5.2% of traffic at the junction.

In the PM peak, the proposed development traffic would see an increase in 73 vehicle movements at the London Road/Montecchio Way junction. At present that junction sees a total of 1352 vehicle movements through the junction during this time period. Therefore, the proposed development would see an increase in 5.4% of traffic at the junction.

As this is a modest increase in vehicle flows and at present there is no evidence of the junction experiencing operational capacity issues (as all vehicles along London Road (N) clear within one green light cycle) it is not anticipated that the proposed development will have a significant impact on the operation of the junction.”

(Paragraphs 7.31 – 7.33)

In summary, the survey work demonstrates that the highway network around Holybourne functions well and does not suffer from congestion. The assessment demonstrates that additional traffic generated by the proposed development would not impact upon the functioning on the highway network around Holybourne and would not result in congestion or delayed journey times. The traffic generated by the development would equate to a maximum of one to two additional movements a minute along London Road.

London Road – Potential Parking and Public Realm Improvements

Redbrown Limited have sought to engage with the local community in respect of the potential implication of the proposed development upon the village.

To inform this engagement Redbrown Limited have reviewed the Holybourne Village Association’s “Holybourne – We love where we live” 2023 survey. The survey indicates that 88% of respondents suggested London Road was becoming a traffic bottleneck and 82% suggested parking was a problem. However a number also indicated that parking along London Road helps to keep traffic speeds low (which is reflected in the speed surveys undertaken by our transport consultants), and so kerbside parking is encouraged by residents, however, inconsiderate parking causes traffic bottlenecks.

Whilst the highways survey and assessment work we have undertaken confirms that the highway network around Holybourne functions well and does not suffer from congestion, Redbrown Limited have noted that public realm and parking improvements along London Road could help address the issues identified by residents.

Redbrown Limited will continue to explore these opportunities with the local community to explore if the proposed development could help deliver public realm and parking improvements and address these local concerns.

Sustainable Development

It is noted that this site, and the proposed development, can contribute to the 'soundness' of the East Hants' new Local Plan, as set out at paragraph 35 of the NPPF:

- Positively prepared: providing new housing and helping achieve East Hampshire housing requirement for the plan period.
- Justified – an appropriate housing site, given the highly sustainable location and the scale of growth proposed which carefully respects the environmental capacity of the site.
- Effective – deliverable within the plan period, with a landowner committed to retaining an interest in the site as a 'master developer'.
- Consistent with national policy in all other respects.

Regulation 18 - Settlement Hierarchy

Redbrown Limited supports the proposed settlement hierarchy, notably the identification of 'Alton & Holybourne' as a Tier 1 settlement.

Notably, we support that Alton and Holybourne have been co-joined for the purposes of the settlement hierarchy. We consider this approach is entirely justified and appropriate.

It is acknowledged that due to their historic physical separation, Alton and Holybourne have separate identities as 'places' which must be respected in the planning and design of new development. However, Alton and Holybourne are now entirely functionally and physically the same settlement. Notably the three schools that are situated within Holybourne serve the wider Alton settlement.

Spatial Strategy

We note the evidence which confirms that Alton and Holybourne comprise the most sustainable settlements within East Hants.

"In the revised settlement hierarchy of this Draft Local Plan, Alton (& Holybourne) stand alone as the Tier 1 settlement within the Local Plan Area. This indicates that it has an

extensive range of accessible facilities and services for meeting the everyday needs of local residents” (Page 336).

We support the proposed spatial strategy which directs the majority of growth towards Alton and Holybourne. As a matter of principle this is an entirely appropriate strategy, which will ensure the best and most efficient use of existing services and infrastructure.

Notwithstanding the above, it is noted that no assessment of the proposed spatial strategy has been undertaken. It is not therefore possible to provide any meaningful feedback on the deliverability and soundness of the spatial strategy. Critically there is no understanding at this stage as to the infrastructure impacts and future requirements arising from proposed spatial strategy.

Relationship with the Alton Neighbourhood Plan

It is noted that Alton Town Council are in the process of preparing a replacement Neighbourhood Plan for the town.

The NPPF states the following concerning the relationship between Local Plans and Neighbourhood Plans:

“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.” (NPPF, Paragraph 29)

The Regulation 18 Plan therefore confirms the proposed relationship between the District Local Plan and the Alton Neighbourhood Plan:

“In line with the NPPF, Local Planning Authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should consider factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

In regard to the emerging Alton Neighbourhood Plan and in line with the strategy identified in this Local Plan, a housing requirement of 700 homes is designated within the settlement of Alton and its surrounding areas, alongside a strategic allocation of approximately 1,000

homes on Land at Neatham Manor Farm (See Policy H1). It should be noted that some proposals for new allocations are identified within this Local Plan as they fall outside (or partly outside) the designated Neighbourhood Plan area. All other sites will be designated within the Regulation 14 version of the Alton Neighbourhood Plan. All proposals, with the exception of the Strategic Allocation (Proposal ALT8), will contribute to the 700-dwelling requirement.” (Local Plan Review 2021-2040, Chapter 12)

It is noted that, after the allocation proposed in the plan for Alton, the residual requirement for Alton is 436 dwellings which need to be found through the Alton Neighbourhood Plan.

In light of the emerging Neighbourhood Plan, and the approach that is being taken by the District Council, we have engaged with Alton Town Council to promote our site for an allocation through the Neighbourhood Plan process. We will be engaging further to set out our further transport evidence and our associated London Road public realm scheme.

However, we understand that, on Wednesday 21st February the Alton Neighbourhood Plan Steering Group took the decision that the Alton Neighbourhood Plan 3 (ANP3) would not allocate sites. The meetings notes confirm that “ANP3 would go forward without site allocations”. It is anticipated that Alton Town Council will formally respond to the Regulation 18B consultation on this basis.

If there is uncertainty about the deliverability of the Neighbourhood Plan, or the Alton housing requirement, then the District Council must be ready to make appropriate allocations in Alton & Holybourne, to ensure that the Local Plan remains sound.

It appears that, as a consequence of the decision taken by Alton Town Council, the emerging East Hampshire Local Plan will now need to make additional allocations within Alton & Holybourne to accommodate at least 436 dwellings.

Given that Alton & Holybourne are the only Tier 1 settlement in the District, with the largest housing requirement in the Plan, it is noted that making the entirety of the allocations for Alton & Holybourne through the Local Plan has some strategic planning benefits.

Notably, it will ensure that the District Council can prepare a robust evidence base, which comprehensively considers the cumulative impacts of all of the proposed development in and around Alton & Holybourne. This will ensure that the Plan can be taken forward soundly, with a robust supporting Sustainability Appraisal and Infrastructure Delivery Strategy.

With specific regard to infrastructure, there is now a clear opportunity for the District Council to more effectively manage the interface between the Land at Neatham Manor Farm and the allocations that will be made elsewhere in Alton & Holybourne. For example there is a clear opportunity for the new electric bus service proposed in support of the Land at Neatham Manor

Farm to be extended to also serve Holybourne, providing access to the schools and improving public transport opportunities for the existing residents of Holybourne (and our proposed development at Land North of London Road).

Summary & Conclusion

These representations have been prepared on behalf of Redbrown Limited in respect of their proposed development at Land North of London Road, Holybourne.

These representations demonstrate that the Land North of London Road, Holybourne is in a highly sustainable location, which is unconstrained in terms of infrastructure capacity and environmental considerations.

The development proposed comprises a commitment to high quality design and long-term stewardship, respecting the landscape capacity of the site and the character of the village of Holybourne.

In accordance with the approach set out at page 338 of the Regulation 18b consultation document, we have been engaging with Alton Town Council to seek to secure an allocation for the site through the Alton Neighbourhood Plan.

However, we understand that Alton Neighbourhood Plan will now not be making any allocations, meaning that the residual housing requirement for Alton & Holybourne of 436 dwellings will need to be identified through the East Hants' Local Plan.

For the reasons set out in these representations, the proposed development at the Land North of London Road, Holybourne, would comprise a suitable, deliverable and effective housing allocation and would thereby contribute to the 'soundness' of the East Hants' new Local Plan, as set out at paragraph 35 of the NPPF.

We trust the comments are helpful and we look forward to engaging further with East Hampshire District Council to secure an allocation for the Land North of London Road, Holybourne in the emerging Local Plan.

Yours faithfully,

Tom Ashley

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1. INTRODUCTION

- 1.1 This Traffic Survey Note (TSN) has been prepared by Paul Basham Associates on behalf of Redbrown Limited to support the promotion of a residential site for circa 223 dwellings on Land North of London Road, Holybourne, Alton.
- 1.2 The aim of the traffic survey note is to understand the current conditions of London Road and understand the traffic impact the development could have upon the existing highways network.
- 1.3 The report will also make reference to proposals the development plans to engage with Holybourne local residents and the community group on to enhance London Road and provide mitigation to improve the public realm and reduce traffic congestion.
- 1.4 The site context plan and location is shown within **Figure 1**.

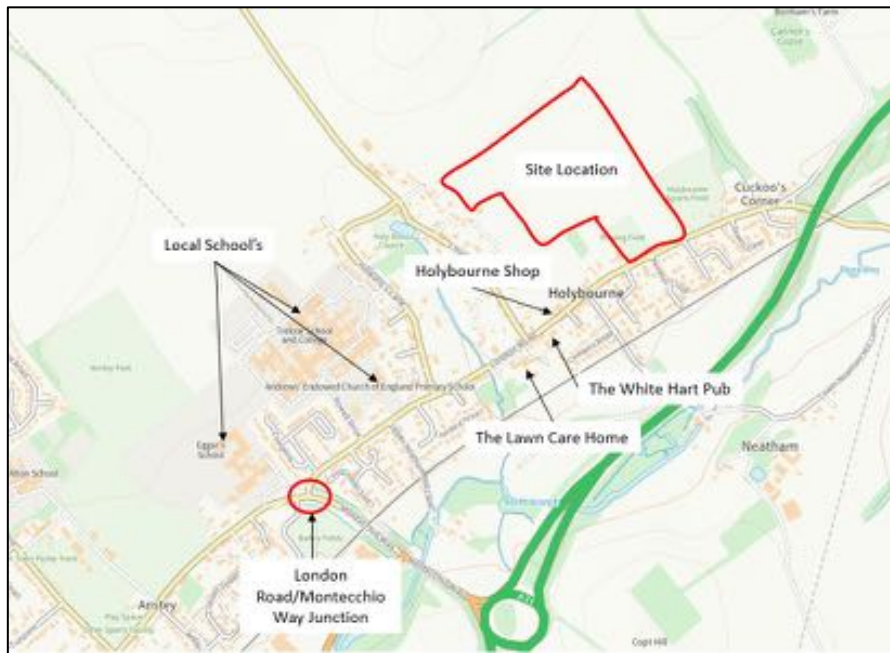


Figure 1: Site Location

- 1.5 The site is located to the northeast of Holybourne, which forms part of the Town of Alton, and is easily accessible from the A31 without the need to travel through Alton Town Centre. The site is currently undeveloped. To the south and west of the site there are residential properties along London Road and to the east of the site there are open fields and a sports field and to the north there are agricultural fields.
- 1.6 The site forms part of the Froyle Estate in Holybourne and this highways appraisal has been prepared to help promote the land for allocation in the forthcoming East Hampshire District Council (EHDC) Local Plan and Alton Town Council Neighbourhood Plan.

Public Engagement

- 1.7 There has been engagement with Holybourne Village Association and the following views from the community have been raised which are considered within this report:
- Speeding through the village
 - Addition of traffic from the development (safety and congestion)
 - Congestion (especially during School drop-off/pick-up)
 - Traffic Holybourne is already busy and there is a huge cause for concern what effect an extra development would have on the safety of our roads and pedestrians.
 - Sections of London Road too fast – speed reduction to 20mph
 - Narrows footways along London Road
 - Lack of a more frequent bus service into Alton

- 1.8 This Traffic Survey Note has been informed by a site visit, two Automated Traffic Count (ATC) surveys and a manual traffic count and queue survey at the London Road/Montecchio Way junction.

3. ATC TRAFFIC SURVEY RESULTS

3.1 To understand the existing conditions in terms of traffic flow and speed along London Road two ATC surveys were undertaken. The ATC counters were down between 4th February 2024 – 10th February 2024. One ATC counter was located in the vicinity of the Suzuki Garage (near the potential site access) and the other to the west of Holybourne Shop. The ATC counters are shown within **Photographs 1** and **2**.



Photograph 1: ATC in vicinity of Suzuki Garage



Photograph 2: ATC in vicinity of Holybourne Shop (Church Lane Junction)

3.2 The results of the ATC survey in the vicinity of the Suzuki Garage are summarised within **Table 1** and **2** with the full outputs attached as **Appendix A**.

Direction	Network AM Peak (08:00-09:00)	Network PM Peak (17:00-18:00)	Recorded PM Peak (16:00-17:00)	12-hour flows
Northeastbound	72	93	108	924
Southwestbound	162	84	88	1018

Table 1: ATC 5-day Average Survey Flows (Suzuki Garage)

- 3.3 As summarised in **Table 1**, the 5-day average vehicle flows for London Road in the vicinity of the Suzuki Garage are 924 Northeastbound and 1018 Southwestbound over a 12-hour period.
- 3.4 Of the 924 Northeastbound trips, 72 (7.8% of 12-hour flows) occur in the network AM peak hour of 08:00-09:00 and 93 (10% of 12-hour flows) occur during the network PM peak period of 17:00-18:00. Whilst the AM peak for this section of London Road is the same as the network peak, the PM peak for London Road is slightly earlier than the PM network peak and occurs between 16:00-17:00. During the PM peak of London Road, there were 108 Northeastbound vehicle trips (11.7% of 12-hour flows).
- 3.5 Of the 1018 Southwestbound trips, 162 (15.9% of 12-hour flows) occur in the network AM peak hour of 08:00-09:00 and 84 (8.3% of 12-hour flows) occur during the network PM peak period of 17:00-18:00. Whilst the AM peak for this section of London Road is the same as the network peak, the PM peak for London Road is slightly earlier than the PM network peak and occurs between 16:00-17:00. During the PM peak of London Road, there were 88 Southwestbound vehicle trips (8.6% of 12-hour flows).
- 3.6 Therefore, in summary, the highest percentage of total 12-hour flows occur between 08:00-09:00 for Southwestbound traffic with 15.9% of total traffic flows occurring during this period. As for Northeastbound trips, the highest percentage of total 12-hour flows occur between 16:00-17:00 with 11.7% of total trips occurring.

Weekday and Weekend Comparison – Suzuki garage

- 3.7 When looking at Northeastbound traffic flows across the weekend in comparison to a weekday, during the AM peak period (08:00-09:00) on a Saturday there was 35 Northeastbound vehicle movements and on Sunday there was 12. Therefore, during the week there is an increase of 37 vehicle movements in the AM peak when compared to a Saturday and an increase in 60 vehicle movements when compared to a Sunday.
- 3.8 When looking at Northeastbound traffic flows across the weekend in comparison to a weekday, during the PM peak period (16:00-17:00) on a Saturday there was 77 Northeastbound vehicle movements and on Sunday there was 56. Therefore, during the week there is an increase of 31 vehicle movements in the PM peak when compared to a Saturday and an increase in 50 vehicle movements when compared to a Sunday.

- 3.9 When looking at Southwestbound traffic flows across the weekend in comparison to a weekday, during the AM peak period (08:00-09:00) on a Saturday there was 56 Southwestbound vehicle movements and on Sunday there was 19. Therefore, during the week there is an increase of 106 vehicle movements in the AM peak when compared to a Saturday and an increase in 143 vehicle movements when compared to a Sunday.
- 3.10 When looking at Southwestbound traffic flows across the weekend in comparison to a weekday, during the PM peak period (16:00-17:00) on a Saturday there was 70 Southwestbound vehicle movements and on Sunday there was 38. Therefore, during the week there is an increase of 18 vehicle movements in the PM peak when compared to a Saturday and an increase in 50 vehicle movements when compared to a Sunday.
- 3.11 It should also be noted that on a weekend the peak period for vehicle trips were between 10:00-14:00. The highest number of Northbound trips was 97 between 13:00-14:00 on Saturday and the highest number of Southwestbound trips was 116 between 10:00-11:00 on Saturday.
- 3.12 Therefore, it is evident that the peak periods on a weekend see a similar or higher amount of vehicle trips than the AM and PM peak periods during the week, but these occur at different times of the day.

Vehicle Speeds – Suzuki Garage

- 3.13 As set out in **Table 2**, the average vehicle speeds along the section of London Road in the vicinity of the Suzuki Garage is 29.3mph Northeastbound which is slightly below the posted 30mph speed limit and 31.1mph Southwestbound which is slightly above the posted 30mph speed limit.

Direction	5-day Average	7-day Average
Northeastbound	29.3mph	29.3mph
Southwestbound	31.1mph	31.1mph

Table 2: ATC Speeds (Suzuki Garage)

- 3.14 When looking at speeds across the 12-hour period, 61% of vehicles were travelling below 25mph, 30% were travelling between 25-30mph and 9% were travelling above 30mph when traveling Northeastbound. When looking at Southwestbound travel, 43% of vehicles were travelling below 25mph, 39% were travelling between 25-30mph and 17% were travelling above 30mph.



3.15 The results of the ATC survey in the vicinity of the Holybourne Shop are summarised within **Table 3** and **4** with the full outputs attached as **Appendix B**.

Direction	Network AM Peak (08:00-09:00)	Network PM Peak (17:00-18:00)	Recorded PM Peak (16:00-17:00)	Recorded PM Peak (14:00-15:00)	12-hour flows
Northeastbound	104	110	129	102	1199
Southwestbound	181	100	104	106	1257

Table 3: ATC 5-day Average Survey Flows (Holybourne Shop)

3.16 As summarised in **Table 3**, the 5-day average vehicle flows for London Road in the vicinity of Holybourne Shop are 1199 Northeastbound and 1257 Southwestbound over a 12-hour period.

3.17 Of the 1199 Northeastbound trips, 104 (8.6% of 12-hour flows) occur in the network AM peak hour of 08:00-09:00 and 110 (9.2% of 12-hour flows) occur during the network PM peak period of 17:00-18:00. Whilst the AM peak for this section of London Road is the same as the network peak, the PM peak for London Road is slightly earlier than the PM network peak and occurs between 16:00-17:00. During the PM peak of London Road, there were 129 Northeastbound vehicle trips (10.6% of 12-hour flows).

3.18 Of the 1257 Southwestbound trips, 181 (14.4% of 12-hour flows) occur in the network AM peak hour of 08:00-09:00 and 100 (8.0% of 12-hour flows) occur during the network PM peak period of 17:00-18:00. Whilst the AM peak for this section of London Road is the same as the network peak, the PM peak for London Road is slightly earlier than the PM network peak and occurs between 14:00-15:00. During the PM peak of London Road, there were 106 Southwestbound vehicle trips (8.4% of 12-hour flows).

3.19 Therefore, in summary, the highest percentage of total 12-hour flows occur between 08:00-09:00 for Southwestbound traffic with 14.4% of total traffic flows occurring during this period. As for Northeastbound trips, the highest percentage of total 12-hour flows occur between 16:00-17:00 with 10.6% of total trips occurring.

Weekday and Weekend Comparison – Holybourne Shop

3.20 When looking at Northeastbound traffic flows across the weekend in comparison to a weekday, during the AM peak period (08:00-09:00) on a Saturday there was 66 Northeastbound vehicle movements and on Sunday there was 31. Therefore, during the



week there is an increase of 38 vehicle movements in the AM peak when compared to a Saturday and an increase in 73 vehicle movements when compared to a Sunday.

- 3.21 When looking at Northeastbound traffic flows across the weekend in comparison to a weekday, during the PM peak period (16:00-17:00) on a Saturday there was 119 Northeastbound vehicle movements and on Sunday there was 76. Therefore, during the week there is an increase of 20 vehicle movements in the PM peak when compared to a Saturday and an increase in 53 vehicle movements when compared to a Sunday.
- 3.22 When looking at Southwestbound traffic flows across the weekend in comparison to a weekday, during the AM peak period (08:00-09:00) on a Saturday there was 71 Southwestbound vehicle movements and on Sunday there was 21. Therefore, during the week there is an increase of 110 vehicle movements in the AM peak when compared to a Saturday and an increase in 160 vehicle movements when compared to a Sunday.
- 3.23 When looking at Southwestbound traffic flows across the weekend in comparison to a weekday, during the PM peak period (14:00-15:00) on a Saturday there was 102 Southwestbound vehicle movements and on Sunday there was 83. Therefore, during the week there is an increase of 4 vehicle movements in the PM peak when compared to a Saturday and an increase in 19 vehicle movements when compared to a Sunday.
- 3.24 It should also be noted that on a weekend the peak period for vehicle trips were between 10:00-11:00. The highest number of Northbound trips was 140 between 10:00-11:00 on Saturday and the highest number of Southwestbound trips was 159 between 10:00-11:00 on Saturday.
- 3.25 Therefore, it is evident that the peak periods on a weekend see a similar or higher amount of vehicle trips than the AM and PM peak periods during the week, but these occur at different times of the day.

Vehicle Speeds – Holybourne Shop

- 3.26 As set out in **Table 4**, the average vehicle speeds along the section of London Road in the vicinity of Holybourne Shop is 27.6mph Northeastbound and 27.8mph Southwestbound which is below the posted 30mph speed limit.

Direction	5-day Average	7-day Average
Northeastbound	27.6mph	27.5mph
Southwestbound	27.6mph	27.8mph

Table 4: ATC Speeds (Holybourne Shop)



- 3.27 When looking at speeds across the 12-hour period, 73% of vehicles were travelling below 25mph, 22% were travelling between 25-30mph and 4% were travelling above 30mph when traveling Northeastbound. When looking at Southwestbound travel, 71% of vehicles were travelling below 25mph, 23% were travelling between 25-30mph and 6% were travelling above 30mph.
- 3.28 The reduction in speed from that in the vicinity of the Suzuki Garage and from the posted 30mph speed limit could be due to the number of parked cars on the carriageway in the vicinity of Holybourne Shop and the number of vehicles pulling up to park by the shop/pub.

Comparison of the Suzuki Garage and Holybourne Shop ATC

- 3.29 The total 12-hour flows Northeastbound in the vicinity of the Suzuki Garage were 924 and in the vicinity of Holybourne Shop were 1199, a difference of 275 vehicles. The total 12-hour flows Southwestbound in the vicinity of the Suzuki Garage were 1018 and in the vicinity of Holybourne Shop were 1257, a difference of 239 vehicles. Based upon the locations of the ATC surveys, the additional vehicles come from the existing residential properties, Lower Neatham Mill Lane and Church Lane.
- 3.30 From the ATC surveys at both the Suzuki Garage and Holybourne Shop, it is evident that the AM peak period of 08:00-09:00 has the highest percentage of total 12-hour flows which travel Southwestbound along London Road and the highest percentage of total 12-hour flows which travel Northeastbound occur between 16:00-17:00.
- 3.31 It is evident that the peak periods on a weekend see a similar or higher amount of vehicle trips than the AM and PM peak periods during the week, but these occur at different times of the day along the whole of London Road. The weekend peak in the vicinity of the Suzuki Garage is 13:00-14:00 Northeastbound and 10:00-11:00 Southwestbound and in the vicinity of Holybourne Shop the weekend peak in both directions is 10:00-11:00.
- 3.32 In terms of vehicle speeds in the vicinity of the Suzuki garage, 61% of vehicles were travelling below 25mph travelling Northeastbound and 43% of vehicles were travelling below 25mph. Only 9% travelling Northeastbound and 17% travelling Southwestbound were travelling above the 30mph speed limit.
- 3.33 In comparison, speeds in the vicinity of the Holybourne Shop, 73% of vehicles were travelling below 25mph travelling Northeastbound and 71% of vehicles were travelling

below 25mph. Only 4% travelling Northeastbound and 6% travelling Southwestbound were travelling above the 30mph speed limit. This is likely to be due to the constraints along the carriageway of on-street parking and vehicles pulling in to park at the shop/pub.

- 3.34 Therefore, it is evident that there are a higher number of vehicle movements in the vicinity of Holybourne Shop than by the Suzuki garage, however vehicles travel at lower speeds in the vicinity of the shop, likely to be due to the on-street parking.

4. LONDON ROAD/MONTECCHIO WAY TRAFFIC SURVEY RESULTS

- 4.1 The London Road/Montecchio Way junction is located southwest of the site and controlled by traffic signals. London Road continues south to become Anstey Road and provides a connection into Alton. Montecchio Way (B3004) provides a route east to connect to the A31. This is anticipated to be the main route utilised by traffic from London Road to access the A31, avoiding travelling through Alton town.
- 4.2 To understand how the London Road/Montecchio Way junction is currently operating a traffic count survey was undertaken on Thursday 8th February 2024. The results of the traffic survey are summarised within **Table 5** (for reference London Road (N) is London Road through Holybourne), with the full outputs attached as **Appendix C**.

Time Period	Direction of Travel	Traffic Flows		
		London Road (W)	London Road (N)	Montecchio Way
AM Peak (08:00-09:00)	London Road (W)	-	142	431
	London Road (N)	200	-	136
	Montecchio Way	455	195	-
Recorded PM Peak (15:45-16:45)	London Road (W)	-	139	422
	London Road (N)	139	-	153
	Montecchio Way	452	89	-
Network PM Peak (17:00-18:00)	London Road (W)	-	123	319
	London Road (N)	153	-	94
	Montecchio Way	574	89	-

Table 5: London Road/Montecchio Way Traffic Survey Results

- 4.3 As summarised within **Table 5**, the London Road/Montecchio Way junction has an AM peak period of 08:00-09:00 (the same as the network AM peak) and a PM peak period of 15:45-16:45 (likely linked to demand from the local schools).
- 4.4 As shown within **Table 5**, there are a total of 1559 vehicle movements through the junction in the AM peak (08:00-09:00). Of these movements, 136 turn left onto Montecchio Way and 200 turn right to London Road (W) and 195 turn right from Montecchio Way to London Road (N) and 142 turn left from London Road (W) to London Road (N).
- 4.5 In addition, during the recorded PM peak period of 15:45-16:45 there are a total of 1394 vehicle movements through the junction. Of these movements, 153 turn left onto Montecchio Way and 139 turn right to London Road (W) and 89 turn right from Montecchio Way to London Road (N) and 139 turn left from London Road (W) to London Road (N).

- 4.6 Moreover, during the network PM peak period of 17:00-18:00 there are a total of 1352 vehicle movements through the junction. Of these movements, 94 turn left onto Montecchio Way and 153 turn right to London Road (W) and 89 turn right from Montecchio Way to London Road (N) and 123 turn left from London Road (W) to London Road (N).
- 4.7 In addition to the traffic count, a queue length survey was also undertaken which is summarised within **Table 6** with the full outputs attached as **Appendix C**.

Time Period	AM Peak (08:00-09:00)		
	London Road (N)	Montecchio Way	London Road (W)
08:00	0	6	8
08:05	11	0	0
08:10	0	10	5
08:15	0	11	9
08:20	13	0	0
08:25	0	13	7
08:30	11	0	0
08:35	0	12	7
08:40	12	0	0
08:45	0	11	7
08:50	13	0	0
08:55	0	12	8
09:00	10	0	0
Recorded PM Peak Period (15:45-16:45)			
15:45	13	0	0
15:50	0	5	10
15:55	0	10	11
16:00	14	0	0
16:05	7	0	0
16:10	0	12	7
16:15	0	12	10
16:20	15	0	0
16:25	0	13	8
16:30	12	0	0
16:35	0	11	13
16:40	14	0	0
16:45	0	13	10
Network PM Peak Period (17:00-18:00)			
17:00	0	11	11
17:05	8	0	0
17:10	0	8	10
17:15	0	9	7
17:20	11	0	0
17:25	13	0	0
17:30	0	6	8
17:35	0	6	7
17:40	8	0	0
17:45	5	0	0
17:50	0	5	6
17:55	7	0	0
18:00	0	7	5

Table 6: Queue Length Survey

- 4.8 During the AM peak period (08:00-09:00) the maximum queue length on London Road (N) and Montecchio Way was 13 and the maximum queue on London Road (W) was 9.
- 4.9 During the recorded PM peak period (15:45-16:45) the maximum queue length on London Road (N) was 15, Montecchio Way was 13 and the maximum queue on London Road (W) was 13.
- 4.10 During the network PM peak period (17:00-18:00) the maximum queue length on London Road (N) was 13, Montecchio Way was 11 and the maximum queue on London Road (W) was 11.
- 4.11 Although there was an increase in traffic during these time periods, queues were clearing through the junction during the green light cycles. There is no evidence to indicate the junction is operating over capacity, with the queues simply a consequence of a signal controlled junction.

5. SCHOOL PEAK HOUR TRAFFIC ANALYSIS

- 5.1 Due to the proximity of the site to Andrew's Endowed Primary School and Treloar's School along London Road and Eggar's School also located along London Road, after the signalised junction, it is understood that traffic is increased along London Road during school drop-off and pick-up times.
- 5.2 For Andrew's Endowed Primary School, the school gates open from 08:45 and the school day ends at 15:30. There is a small car park located to the front of the school which appears to be solely for staff and visitors and parents are known to park along London Road.
- 5.3 For Treloar's School the school day starts at 09:00 and the school day ends at 16:00 (however, it is understood some pupils may stay longer). Treloar's has parking and drop-off/pick-up zones on-site.
- 5.4 In terms of Eggar's, the school day starts at 08:30 and the day ends at 14:30. Eggar's School has its own car park and good walking and cycling connections to the site.
- 5.5 Eggar's School has its own car park and it is likely this is utilised for dropping off pupils and therefore only traffic travelling southwest would utilise the London Road/Montecchio Way junction and it is unlikely pupils will get dropped off along London Road (N). However, as noted while on site on 19th October 2023, a small number of pupils appear to be dropped off in Complins (the first cul-de-sac side road on London Road east of the signalised junction of London Road/ Montecchio Way).
- 5.6 For Treloar's School, traffic coming from the southwest would utilise the London Road/Montecchio Way junction. All pupils are taken into the school grounds to be dropped-of/picked-up and therefore vehicles do not park along London Road.
- 5.7 It is understood that the main area of local concern is due to those dropping-off and picking-up pupils from Andrew's Endowed Primary School parking along London Road and making the road congested due to reducing the two-way traffic flow.

AM Peak 08:00-09:00

- 5.8 A site visit was undertaken on Thursday 19th October during the hours of 07:30am-10:00am. Traffic associated with Andrew's Endowed Primary School largely arrived between 08:30am and 08:50am. It was noted that cars were parked for up to 20 minutes as pupils were arriving prior to being allowed into school.
- 5.9 Traffic associated with the school parked along Cranford Drive, in the layby outside Treloar's and along London Road outside of the school, right up until the signalised junction with London Road/ Montecchio Way.
- 5.10 The majority of vehicles appeared to start departing from 08:50am that were associated with Andrew's Endowed Primary School. As there was a large proportion of vehicles departing at once this meant traffic began to build up at the London Road/ Montecchio Way junction. The largest queue recorded on site was c20 vehicles, however, all of these vehicles cleared within one cycle of the green light.
- 5.11 This has been evaluated against the queue length survey undertaken on Thursday 8th February 2024 (**Table 6**). This recorded queues of 11, 12 and 13 between 08:30-08:50 along London Road (N) which all cleared within a 5-minute period.

PM Peak for Eggar's School (14:15-14:45)

- 5.12 As Eggar's School day finishes at 14:30, the 15-minute period either side of this has been assessed to understand whether this creates any congestion at the London Road/Montecchio Way junction.
- 5.13 The queue length survey (**Appendix C**) recorded the highest queue length of 8 during the time period 14:15-14:45 which appeared to clear within the 5-minute intervals. Therefore, it is not anticipated that traffic associated with Eggar's School affects the operation of the signalised junction, nor causes congestion along London Road.

PM Peak for Andrew's Endowed Primary School (15:15-15:45)

- 5.14 As Andrew's Endowed Primary School Day finishes at 15:30, the 15-minute period either side of this has been assessed to understand whether this creates any congestion at the London Road/Montecchio Way junction.
- 5.15 The queue length survey (**Appendix C**) recorded the highest queue length of 13 during the time period 15:15-15:45 which appeared to clear within the 5-minute intervals. Although, a number of 5-minute intervals recorded c13 vehicles in the queue, these queues cleared

through the green light cycle and did not cause additional congestion along London Road. Although the traffic flow was higher during this time period due to it being school pick-up time, there is no reason to believe the junction was working insufficiently.

Traffic flow between 15:00-16:00

- 5.16 As the queue lengths started to increase at the London Road/Montecchio Way junction between 15:15-15:45, an evaluation of the traffic flows along the road between 15:00-16:00 (to cover the traffic flow period from the ATC data) has been undertaken.
- 5.17 When comparing the ATC survey located in the vicinity of Holybourne Shop with the traffic count at the London Road/Montecchio Way junction, 257 vehicles turned into London Road (N) between 15:00-16:00, 221 vehicles turned out of London Road (N) between 15:00-16:00 and 122 vehicles travelled northeastbound and 103 travelled southwestbound between 15:00-16:00. This means that 135 vehicles (34 every 15-minutes) travelling northeastbound did not travel as far as Holybourne Shop and 118 vehicles (30 trips every 15-minutes) travelling southwestbound has not travelled from Holybourne Shop.
- 5.18 Based on the traffic count survey at the London Road/Montecchio Way junction, between 15:00 and 15:15 64 vehicles turned into London Road (N) and 52 vehicles turned out of London Road (N).
- 5.19 Between 15:15 and 15:30 132 vehicles turned into London Road (N) and 102 vehicles turned out of London Road (N).
- 5.20 Between 15:30 and 15:45 64 vehicles turned into London Road (N) and 56 vehicles turned out of London Road (N).
- 5.21 Between 15:45 and 16:00 61 vehicles turned into London Road (N) and 67 vehicles turned out of London Road (N).
- 5.22 Between 15:15-15:30 there was an increase in 68 vehicles turning into London Road (N) and an increase in 50 vehicles turning out of London Road (N). It can therefore be assumed that between 15:15-15:30 is the peak period for school traffic based upon the school day ending around 15:30 and the traffic increase at the junction.
- 5.23 The survey results suggest that traffic increases by c50% for a 15-minute period before returning to normal. However, as shown within the queue length survey and from commentary from the auditor, all cars waiting at the lights cleared in one green light cycle.

Therefore, there is no evidence to support an existing capacity issues associated with London Road or with the operation of the London Road/Montecchio Way junction.

6. HOLYBOURNE SURVEY 2023

- 6.1 Although the traffic surveys do not present a cause for concern on traffic along London Road (N) or at the London Road/Montecchio Way junction, comments have been raised by the local residents within the “Holybourne – We love where we live” survey 2023 where:
- 272 respondents (88%) suggested that London Road is becoming a traffic bottleneck
 - 253 respondents (82%) suggested parking is a major problem
 - 18 respondents (6%) suggested no issue with traffic along London Road
 - 22 respondents (7%) suggested parking on London Road is not an issue
- 6.2 Although 88% suggested London Road was becoming a traffic bottleneck and 82% suggested parking was a problem, a number of comments were provided which indicated that parking along London Road helps to keep traffic speeds low (which is reflected in the speed surveys analysed above), and so kerbside parking is encouraged by residents, however, inconsiderate parking causes traffic bottlenecks.
- 6.3 Therefore, as part of the development proposals, consideration has been given to measures that could improve the situation for local residents on London Road. In particular, the area around Holybourne Shop and The White Hart Pub has been identified as a ‘hub’ within the settlement, and an area to focus improvement to the parking situation along London Road. This could be through creating public realm improvements in the vicinity of Holybourne Shop and The White Hart pub with designated parking areas, better crossing facilities and improved street scene for residents to enjoy.
- 6.4 In addition, observations have identified a number of parked cars in the vicinity of The Lawn Care Home, where the existing carriageway width does narrow. As part of the development proposals, consideration has been given to formalising parking in this area which will help to ensure two-way traffic flow along the carriageway is less restricted and ensure inter-visibility between oncoming vehicles is achievable.
- 6.5 These plans will be shared separately with the community for comment.

7. PROPOSED DEVELOPMENT HIGHWAY IMPACT

7.1 To understand the likely vehicular trip generation that the site could produce, trip rates have been derived from the TRICS (v7.10.4) database utilising the following parameters:

- ‘Residential’, ‘Houses Privately Owned’ Use Class
- Sites in England (excluding Greater London)
- 100– 300 units
- Village and Neighbourhood Centre Locations
- Weekday surveys only
- 3 surveys removed due to being taken during COVID-19 restrictions

7.2 The results of the assessment are summarised within **Table 7**, with the full outputs attached as **Appendix D**.

	AM Peak (08:00-09:00)		PM Peak (17:00-18:00)		Daily (12 hours)
	Arrivals	Departures	Arrivals	Departures	
Trip Rate	0.144	0.377	0.326	0.143	4.397
Trip Generation (223 dwellings)	32	84	73	32	981

Table 7: Proposed Development Trip Generation

7.3 As summarised in **Table 7** the proposed development could potentially generate up to 116 two-way trips in the AM peak and 105 two-way trips in the PM peak with a total of 981 trips over a 12-hour period.

7.4 As the ATC surveys indicated a peak period of 16:00-17:00 and a weekend peak of 10:00-11:00, the predicted traffic increase from the proposed development during these time periods is indicated within **Table 8**.

	AM Peak (10:00-11:00)		PM Peak (16:00-17:00)	
	Arrivals	Departures	Arrivals	Departures
Trip Rate	0.136	0.169	0.248	0.178
Trip Generation (223 dwellings)	30	38	33	38

Table 8: Proposed Development Trip Generation During ATC Survey Peak Hours

7.5 As summarised in **Table 8** the proposed development could potentially generate up to 68 two-way trips between 10:00-11:00 and 71 two-way trips between 16:00-17:00.

7.6 However, data from 2011 Census (dataset WU03EW) has been utilised to understand how residents in the East Hampshire 001 area (where the site is located – shown in **Figure 2**) are currently travelling. Although this area covers a wide and mainly rural area, the modal split was higher in terms of car drivers than that of East Hampshire 002 and for a robust assessment, the higher modal split has been utilised. The modal split is shown within **Table 9** and attached as **Appendix E**.

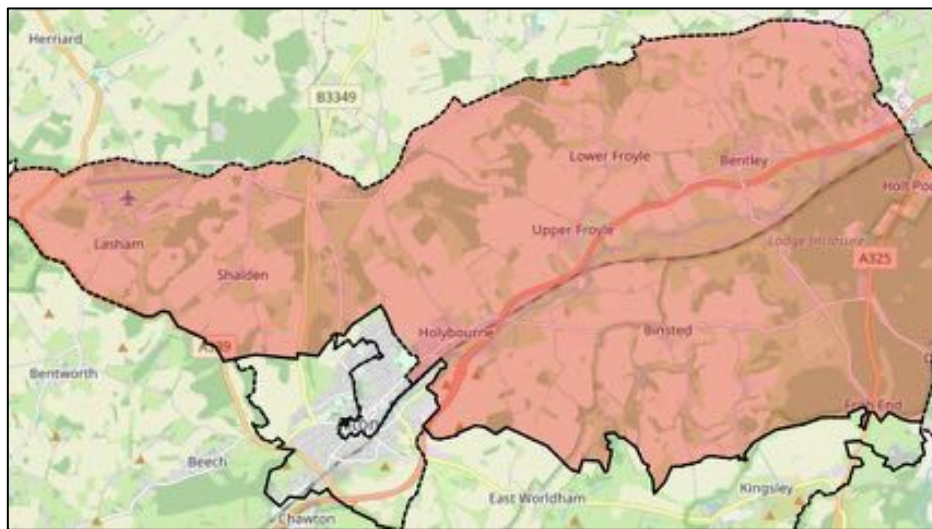


Figure 2: East Hampshire 001

Method of Travel	Percentage
Train	9%
Bus/Coach	1%
Motorcycle	1%
Driving Car/Van	75%
Passenger in Car/Van	3%
Bicycle	2%
On Foot	8%
Other Method of Travel	1%

Table 9: East Hampshire 001 Modal Split

- 7.7 As shown in **Table 9**, Census data suggests that only 75% of residents will travel by car while the others use sustainable travel modes, suggesting the overall vehicle trip generation for the site is likely to reduce.
- 7.8 In addition to the Census data, it should also be noted that homeworking has increased since the COVID-19 pandemic. The 2011 Census data and some TRICS surveys (dependent upon when they were undertaken) would therefore not account for the reduction of journeys due to homeworking.
- 7.9 Basingstoke and Deane Economic Needs Assessment (ENA) 2023 suggested that there is no evidence of a wide 'return to the office' trend coming through, with some degree of homeworking now a permanent feature and that there is a consensus is that the market will not return to a pre-Covid 'normal' and therefore our methodology needs to change to account for this 'new normal'.
- 7.10 Using data from the Opinions and Lifestyle Survey the ONS estimated that pre-Covid (2019) 12% of workers worked from home a least one day a week. By January 2023 this had increased to 44% with 16% working only from home and 28% worked at least one day at home. In addition, throughout 2022 the percentage of working adults reporting having worked from home has varied between 25% and 40%.
- 7.11 Therefore, it can be assumed that a large percentage of modal shift will have changed since 2011 due to the increase in home working and therefore, the predicted trip generation for the site is likely to vary across the week. If utilising the statistics from the ONS it can be assumed that between 25%-40% of residents at the development could work from home with 28% working at home at least once a week. Therefore, it is evident that traffic generation from the site is likely to change on a daily basis and be lower than the trip rates provided.
- 7.12 As shown within **Table 9**, it is anticipated that 25% of residents will travel by sustainable travel modes. Therefore, in addition, to the vehicular trip rate, data has been derived from the TRICS (v7.10.4) database utilising the same parameters as above for pedestrian, cycle and public transport trips. The associated trip rates and trip generation is shown in **Table 10** with outputs presented in **Appendix D**.

		AM Peak (08:00-09:00)		PM Peak (17:00-18:00)		Daily (12 hours)
		Arrivals	Departures	Arrivals	Departures	
Cycle	Trip Rate	0.004	0.012	0.007	0.004	0.103
	Trip Generation (223 dwellings)	1	3	2	1	23
Pedestrian	Trip Rate	0.021	0.084	0.029	0.018	0.723
	Trip Generation (223 dwellings)	5	19	6	4	161
Public Transport	Trip Rate	0.001	0.008	0.004	0.000	0.111
	Trip Generation (223 dwellings)	0	2	1	0	25

Table 10: Pedestrian, Cycle and Public Transport Trip Generation

7.13 As seen in **Table 10** the proposed development could create up to 23 cycle trips, 161 pedestrian trips (186 when including public transport trips due to walking to bus stops) and 25 public transport trips over a 12-hour period.

7.14 The site benefits from good pedestrian infrastructure with multiple Public Rights of Way offering routes into Alton and the local area. The development will provide pedestrian/cycle connections onto London Road and will provide connections onto PRow in the vicinity of the site where possible. Based upon this, it is anticipated that the existing pedestrian and cycle infrastructure can accommodate an increase in pedestrian and cycle movements from the site.

7.15 In terms of public transport trips, it is anticipated that the development could produce an increase of 25 trips over a 12-hour period. It is anticipated that the current services can accommodate this increase due to their hourly frequency. In addition, an increase in 25 trips is not viable to increase public transport services.

Vehicular Trip Distribution

7.16 Given the location of the site in relation to the strategic road network, it is anticipated that the vast majority of traffic would travel southwestbound from the site towards Alton and the access on to the A31, however, traffic is likely to dissipate quickly onto the network.

7.17 To understand the direction of travel from the site and how many vehicles will travel southwestbound along London Road and utilise the London Road/Montecchio Way junction, traffic distribution diagrams have been created using the 2011 'Travel to Work'

Census data (WF01BEW) for East Hampshire 001D (where the site is located), shown within **Figure 3** and attached as **Appendix E**. Data set WF01BEW has been assessed to understand to destinations people travel to work from the site (East Hampshire 001D) and determine the likely routes they travel.

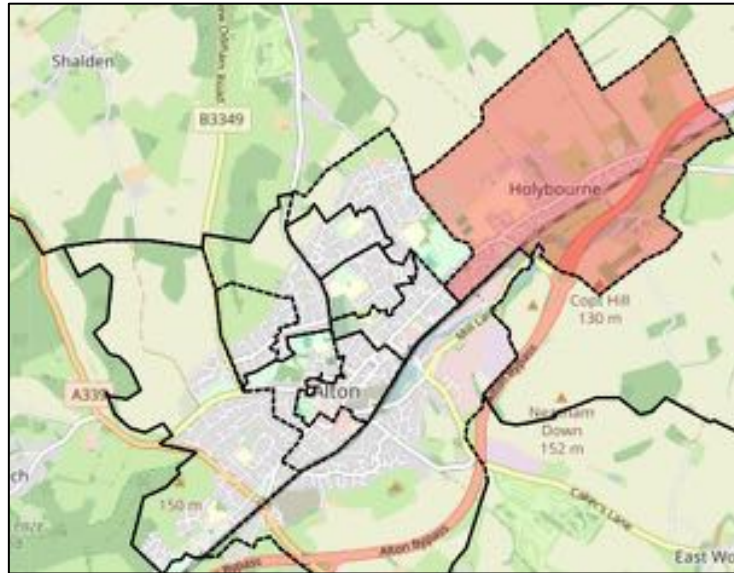


Figure 3: East Hampshire 001D

7.18 **Table 11** shows the main workplace destinations and the percentage of residents (East Hampshire 001D) that commute to each destination, along with the most likely route used.

Destination	Percentage	Direction out of the Site	Direction of travel at London Road/Montecchio Way Junction (for those turning right)
Holybourne	3%	Right	N/A
Binstead	3%	Left	N/A
Upper Froyle	3%	Right/Left	Left to Montecchio Way
Bentley/Bentworth	4%	Right	Right to London Road
Alton	25%	Right	Right to London Road
Four Marks/Lower Farringdon	3%	Right	Left to Montecchio Way
East Wordham	1%	Left	N/A
Selbourne	1%	Right	Left to Montecchio Way
Bordon/Petersfield/Horndean	5%	Right/Left	Left to Montecchio Way

London	12%	Right/Left	Left to Montecchio Way
Farnham/Aldershot/Farnborough	14%	Right/Left	Left to Montecchio Way
Guildford/Godalming/Woking	7%	Right/Left	Left to Montecchio Way
Winchester/Eastleigh/Southampton	4%	Right	Left to Montecchio Way
Basingstoke	8%	Right	Right to London Road
Reading	1%	Right/Left	Right to London Road
Andover	0%	Right	Right to London Road
The North	1%	Right/Left	Left to Montecchio Way
The East	1%	Right	Left to Montecchio Way
The West	1%	Right	Right to London Road

Table 11: Distributions

7.19 As summarised in **Table 11**, 73% of the development traffic can be expected to turn right out of the site access and 27% can be expected to turn left and travel along London Road. As Census data has been utilised for this calculation it would be assumed that the vehicle trip percentage departing will also return from the same direction.

Site Access

7.20 In the AM peak 73% of vehicles turning right equates for 61 vehicle trips and in the PM peak equates to 23 vehicle trips. Of the 27% turning left in the AM peak this equates to 23 vehicles and in the PM peak 9 vehicles.

7.21 In the AM peak 73% of vehicles arriving from the London Road/Montecchio Way junction/Holybourne can be expected to be 23 vehicle trips and in the PM peak can be expected to be 53 vehicle trips. In terms of trips coming from the north of London Road, the 27% returning to the site and turning right in will equate to 9 vehicles in the AM peak and 20 vehicles in the PM peak.

London Road/Montecchio Way Junction

7.22 Of the 73% that turn right, 3% are expected to stay within Holybourne while the remaining 70% will utilise the London Road/Montecchio Way junction. It is anticipated that 36% will turn right onto London Road and 34% will turn left onto Montecchio Way.

- 7.23 In the AM peak the 34% of vehicles turning left onto Montecchio Way equates to 29 vehicles and in the PM peak equates to 11 vehicles. Those returning from Montecchio Way and turning right into London Road equate to 11 vehicles in the AM peak and 25 vehicles in the PM peak.
- 7.24 In the AM peak the 36% of vehicles turning right onto London Road equates to 30 vehicles and in the PM peak equates to 11 vehicles. Those returning from London Road (W) and turning left into London Road equate to 12 vehicles in the AM peak and 26 vehicles in the PM peak.
- 7.25 This is shown within the distribution diagrams attached as **Appendix F**.

Percentage Impact Assessment

- 7.26 Based on the information provided above and within the trip distribution diagrams (**Appendix F**), a percentage impact assessment has been undertaken by comparing the proposed development trip distributions with the existing traffic flows recorded by the ATC and traffic count surveys.

London Road

- 7.27 In terms of vehicles travelling southwestbound on London Road (taken from the Suzuki Garage ATC), at present (2024) there are 162 vehicles movements in the AM peak (08:00-09:00) and 84 in the PM Peak (17:00-18:00).
- 7.28 The addition of 61 southwestbound movements (not including those which will come from the north of London Road and turn into the site) in the AM peak the traffic flows along London Road would increase by 38% and the addition of 23 southwestbound movements in the PM peak the traffic flows along London Road would increase by 27%. The addition of 61 southwest bound movements in the AM peak equates to one additional vehicle per minute and the additional 23 southwestbound vehicles movements in the PM peak equate to an additional vehicle movement every 2-3 minutes.
- 7.29 In terms of vehicles travelling northeastbound on London Road (taken from the Suzuki Garage ATC), at present (2024) there are 72 vehicles movements in the AM peak (08:00-09:00) and 93 in the PM Peak (17:00-18:00).
- 7.30 The addition of 23 northeastbound movements (not including those which will turn to travel north of London Road from the site) in the AM peak the traffic flows along London Road would increase by an additional vehicle movement every 2-3 minutes and in the PM

peak an addition of 53 northeastbound movements would equate to an additional vehicle movement every 1-2-minutes.

London Road/Montecchio Way

- 7.31 In the AM peak, the proposed development traffic would see an increase in 81 vehicle movements at the London Road/Montecchio Way junction. At present that junction sees a total of 1559 vehicle movements through the junction during this time period. Therefore, the proposed development would see an increase in 5.2% of traffic at the junction.
- 7.32 In the PM peak, the proposed development traffic would see an increase in 73 vehicle movements at the London Road/Montecchio Way junction. At present that junction sees a total of 1352 vehicle movements through the junction during this time period. Therefore, the proposed development would see an increase in 5.4% of traffic at the junction.
- 7.33 As this is a modest increase in vehicle flows and at present there is no evidence of the junction experiencing operational capacity issues (as all vehicles along London Road (N) clear within one green light cycle) it is not anticipated that the proposed development will have a significant impact on the operation of the junction.

8. SUMMARY AND CONCLUSIONS

- 8.1 This Traffic Survey Note (TSN) has been prepared by Paul Basham Associates on behalf of Redbrown Limited to support the promotion of a residential site for circa 223 dwellings on Land North of London Road, Holybourne, Alton.
- 8.2 ATC counters were down between 4th February 2024 – 10th February 2024. One ATC counter was located in the vicinity of the Suzuki Garage and the other to the west of Holybourne Shop.
- 8.3 The 5-day average vehicle flows for London Road in the vicinity of the Suzuki Garage are 924 Northeastbound and 1018 Southwestbound over a 12-hour period. The highest percentage of total 12-hour flows occur between 08:00-09:00 for Southwestbound traffic with 15.9% of total traffic flows occurring during this period. As for Northeastbound trips, the highest percentage of total 12-hour flows occur between 16:00-17:00 with 11.7% of total trips occurring.
- 8.4 The average vehicle speeds along the section of London Road in the vicinity of the Suzuki Garage is 29.3mph northeastbound which is slightly below the posted 30mph speed limit and 31.1mph southwestbound which is slightly above the posted 30mph speed limit. 9% were travelling above 30mph when traveling Northeastbound and 17% were travelling above 30mph Southwestbound.
- 8.5 The 5-day average vehicle flows for London Road in the vicinity of Holybourne Shop are 1199 Northeastbound and 1257 Southwestbound over a 12-hour period. The highest percentage of total 12-hour flows occur between 08:00-09:00 for Southwestbound traffic with 14.4% of total traffic flows occurring during this period. As for Northeastbound trips, the highest percentage of total 12-hour flows occur between 16:00-17:00 with 10.6% of total trips occurring.
- 8.6 The average vehicle speeds along the section of London Road in the vicinity of Holybourne Shop is 27.6mph Northeastbound and 27.8mph Southwestbound which is below the posted 30mph speed limit. 4% were travelling above 30mph when traveling Northeastbound and 6% were travelling above 30mph Southwestbound.
- 8.7 To understand how the London Road/Montecchio Way junction is currently operating a traffic count survey was undertaken on Thursday 8th February 2024, along with a queue length survey. The highest queues recorded were c15 vehicles on London Road, however,

all vehicles clear through one green light cycle and therefore there is no evidence of capacity or operation concerns at this junction.

- 8.8 Consideration has also been given to the school peak periods, to ensure that these also operate sufficiently.
- 8.9 Options for public realm and crossing improvements in the vicinity of Holybourne Shop and The White Hart pub have been considered in response to comments made by the public through the “Holybourne - We love where we live” survey 2023, as well as formalising the parking in the vicinity of the Lawn Care Home.
- 8.10 Traffic generation from the site has been considered using the industry standard TRICS database, with consideration to local Census data and the baseline traffic flows recorded through surveys. The impact of the development on London Road and on the junction with Montecchio Way is considered modest and acceptable in the context of the requirements of the National Planning Policy Framework requirements.
- 8.11 In addition, the proposed development could create up to 23 cycle trips, 161 pedestrian trips (186 when including public transport trips) and 25 public transport trips over a 12-hour period. It is anticipated the current provision of pedestrian, cycle and public transport infrastructure can accommodate this increase.

Appendix A

Alton ATC, London Road (Eastern Site)



Direction: Northeastbound

Hour Beginning	Sun 04/02/2024	Mon 05/02/2024	Tue 06/02/2024	Wed 07/02/2024	Thu 08/02/2024	Fri 09/02/2024	Sat 10/02/2024	5-Day Ave.	7-Day Ave.
00:00	3	3	1	1	4	0	2	2	2
01:00	2	0	0	1	3	1	1	1	1
02:00	1	0	0	1	2	2	1	1	1
03:00	1	0	1	0	1	2	0	1	1
04:00	1	0	0	0	3	0	0	1	1
05:00	0	2	2	7	6	3	2	4	3
06:00	3	13	16	10	19	12	7	14	11
07:00	6	50	47	45	52	58	14	50	39
08:00	12	70	84	87	73	46	35	72	58
09:00	25	67	84	76	66	58	46	70	60
10:00	51	65	76	66	67	64	70	68	66
11:00	46	60	75	63	44	77	94	64	66
12:00	68	71	76	63	76	85	95	74	76
13:00	63	75	67	72	48	72	97	67	71
14:00	48	82	101	84	65	85	68	83	76
15:00	66	89	120	109	94	89	78	100	92
16:00	56	126	112	99	99	104	77	108	96
17:00	30	106	98	98	88	76	69	93	81
18:00	19	69	97	73	64	69	39	74	61
19:00	14	39	64	51	44	46	30	49	41
20:00	8	35	26	47	34	40	19	36	30
21:00	6	29	40	23	29	19	24	28	24
22:00	3	20	21	12	13	19	16	17	15
23:00	1	2	7	2	8	8	12	5	6
Total 12H(7-19) 16H(6-22) 18H(6-24) 24H(0-24)	490 521 525 533	930 1046 1068 1073	1037 1183 1211 1215	935 1066 1080 1090	836 962 983 1002	883 1000 1027 1035	782 862 890 896	924 1051 1074 1083	842 949 969 978
AM Peak	10:00 51	08:00 70	08:00 84	08:00 87	08:00 73	11:00 77	11:00 94	08:00 72	08:00 66
PM Peak	12:00 68	16:00 126	15:00 120	15:00 109	16:00 99	16:00 104	13:00 97	16:00 108	16:00 96

Paul Castle Associates

Direction: Southwestbound

Hour Beginning	Sun 04/02/2024	Mon 05/02/2024	Tue 06/02/2024	Wed 07/02/2024	Thu 08/02/2024	Fri 09/02/2024	Sat 10/02/2024	5-Day Ave.	7-Day Ave.
00:00	8	3	0	0	1	0	2	1	2
01:00	3	0	0	0	1	0	0	0	1
02:00	1	0	0	1	1	3	0	1	1
03:00	1	0	1	1	0	3	0	1	1
04:00	0	1	3	4	4	4	2	3	3
05:00	1	5	7	8	7	7	2	7	5
06:00	3	29	39	30	36	30	6	33	25
07:00	7	65	89	78	89	64	25	77	60
08:00	19	151	184	164	194	116	56	162	136
09:00	39	69	92	101	73	70	78	81	75
10:00	69	66	89	80	56	88	116	76	81
11:00	65	73	81	79	42	85	108	72	76
12:00	68	77	93	67	58	83	100	76	78
13:00	56	81	87	76	42	73	109	72	75
14:00	52	85	82	88	58	101	76	83	77
15:00	58	94	98	80	57	79	69	82	76
16:00	38	99	104	101	53	84	70	88	78
17:00	27	102	88	87	74	69	52	84	71
18:00	19	60	70	65	63	76	39	67	56
19:00	13	46	64	53	42	50	31	51	43
20:00	8	16	22	13	25	27	18	21	18
21:00	3	11	14	16	10	16	16	13	12
22:00	3	11	9	17	6	11	14	11	10
23:00	1	4	7	5	3	14	10	7	6
Total 12H(7-19) 16H(6-22) 18H(6-24) 24H(0-24)	517 544 548 562	1022 1124 1139 1148	1157 1296 1312 1323	1066 1178 1200 1214	859 972 981 995	988 1111 1136 1153	898 969 993 999	1018 1136 1154 1167	930 1028 1044 1056
AM Peak	10:00 69	08:00 151	08:00 184	08:00 164	08:00 194	08:00 116	10:00 110	08:00 162	08:00 136
PM Peak	12:00 68	17:00 102	16:00 104	16:00 101	17:00 74	14:00 101	13:00 109	16:00 88	16:00 78

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Direction: Total Flow

Hour Beginning	Sun 04/02/2024	Mon 05/02/2024	Tue 06/02/2024	Wed 07/02/2024	Thu 08/02/2024	Fri 09/02/2024	Sat 10/02/2024	5-Day Ave.	7-Day Ave.
00:00	11	6	1	1	5	0	4	3	4
01:00	5	0	0	1	4	1	1	1	2
02:00	2	0	0	2	3	5	1	2	2
03:00	2	0	2	1	1	5	0	2	2
04:00	1	1	3	4	7	4	2	4	3
05:00	1	7	9	15	13	10	4	11	8
06:00	6	42	55	40	55	42	13	47	36
07:00	13	115	136	123	141	122	39	127	98
08:00	31	221	268	251	267	162	91	234	184
09:00	64	136	176	177	139	128	124	151	135
10:00	120	131	165	146	123	152	186	143	146
11:00	111	133	156	142	86	162	202	136	142
12:00	136	148	169	130	134	168	195	150	154
13:00	119	156	154	148	90	145	206	139	145
14:00	100	167	183	172	123	186	144	166	154
15:00	124	183	218	189	151	168	147	182	169
16:00	94	225	216	200	152	188	147	196	175
17:00	57	208	186	185	162	145	121	177	152
18:00	38	129	167	138	127	145	78	141	117
19:00	27	85	128	104	86	96	61	100	84
20:00	16	51	48	60	59	67	37	57	48
21:00	9	40	54	39	39	35	40	41	37
22:00	6	31	30	29	19	30	30	28	25
23:00	2	6	14	7	11	22	22	12	12
Total 12H(7-19) 16H(6-22) 18H(6-24) 24H(0-24)	1007 1065 1073 1095	1952 2170 2207 2221	2194 2479 2523 2538	2001 2244 2280 2304	1695 1934 1964 1997	1871 2111 2163 2188	1680 1831 1883 1895	1943 2188 2227 2250	1771 1976 2013 2034
AM Peak	10:00 120	08:00 221	08:00 268	08:00 251	08:00 267	08:00 162	11:00 202	08:00 234	08:00 184
PM Peak	12:00 136	16:00 225	15:00 218	16:00 200	17:00 162	16:00 188	13:00 206	16:00 196	16:00 175

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Alton ATC, London Road (Eastern Site)

Direction: Northeastbound

	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	533	504	29	0	0
Mon 5 Feb 2024	1073	967	105	0	1
Tue 6 Feb 2024	1215	1112	102	0	1
Wed 7 Feb 2024	1090	1002	87	0	1
Thu 8 Feb 2024	1002	924	77	0	1
Fri 9 Feb 2024	1035	938	97	0	0
Sat 10 Feb 2024	896	843	52	1	0
5 Day Ave.	1083	989	94	0	1
7 Day Ave.	978	899	78	0	1

Direction: Southwestbound

	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	562	531	30	1	0
Mon 5 Feb 2024	1148	1035	110	1	2
Tue 6 Feb 2024	1323	1186	126	3	8
Wed 7 Feb 2024	1214	1122	91	0	1
Thu 8 Feb 2024	995	891	100	2	2
Fri 9 Feb 2024	1153	1035	114	0	4
Sat 10 Feb 2024	999	939	60	0	0
5 Day Ave.	1167	1054	108	1	3
7 Day Ave.	1056	963	90	1	2

Direction: Total Flow

	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	1095	1035	59	1	0
Mon 5 Feb 2024	2221	2002	215	1	3
Tue 6 Feb 2024	2538	2298	228	3	9
Wed 7 Feb 2024	2304	2124	178	0	2
Thu 8 Feb 2024	1997	1815	177	2	3
Fri 9 Feb 2024	2188	1973	211	0	4
Sat 10 Feb 2024	1895	1782	112	1	0
5 Day Ave.	2250	2042	202	1	4
7 Day Ave.	2034	1861	169	1	3

	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	100.0%	94.6%	5.4%	0.0%	0.0%
Mon 5 Feb 2024	100.0%	90.1%	9.8%	0.0%	0.1%
Tue 6 Feb 2024	100.0%	91.5%	8.4%	0.0%	0.1%
Wed 7 Feb 2024	100.0%	91.9%	8.0%	0.0%	0.1%
Thu 8 Feb 2024	100.0%	92.2%	7.7%	0.0%	0.1%
Fri 9 Feb 2024	100.0%	90.6%	9.4%	0.0%	0.0%
Sat 10 Feb 2024	100.0%	94.1%	5.8%	0.1%	0.0%
5 Day Ave.	100.0%	91.3%	8.6%	0.0%	0.1%
7 Day Ave.	100.0%	91.9%	8.0%	0.0%	0.1%

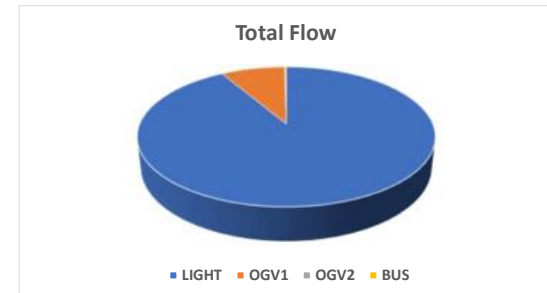
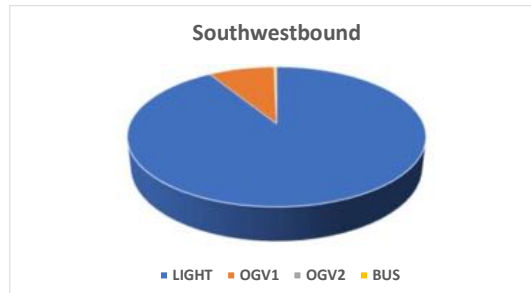
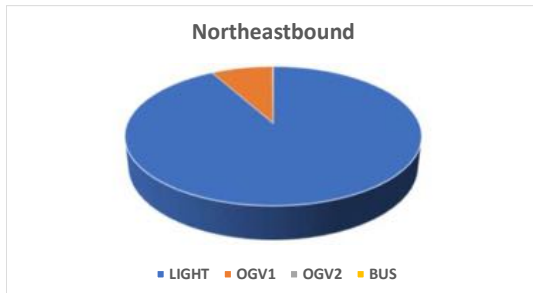
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	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	100.0%	94.5%	5.3%	0.2%	0.0%
Mon 5 Feb 2024	100.0%	90.2%	9.6%	0.1%	0.2%
Tue 6 Feb 2024	100.0%	89.6%	9.5%	0.2%	0.6%
Wed 7 Feb 2024	100.0%	92.4%	7.5%	0.0%	0.1%
Thu 8 Feb 2024	100.0%	89.5%	10.1%	0.2%	0.2%
Fri 9 Feb 2024	100.0%	89.8%	9.9%	0.0%	0.3%
Sat 10 Feb 2024	100.0%	94.0%	6.0%	0.0%	0.0%
5 Day Ave.	100.0%	90.3%	9.3%	0.1%	0.3%
7 Day Ave.	100.0%	91.1%	8.5%	0.1%	0.2%

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	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	100.0%	94.5%	5.4%	0.1%	0.0%
Mon 5 Feb 2024	100.0%	90.1%	9.7%	0.0%	0.1%
Tue 6 Feb 2024	100.0%	90.5%	9.0%	0.1%	0.4%
Wed 7 Feb 2024	100.0%	92.2%	7.7%	0.0%	0.1%
Thu 8 Feb 2024	100.0%	90.9%	8.9%	0.1%	0.2%
Fri 9 Feb 2024	100.0%	90.2%	9.6%	0.0%	0.2%
Sat 10 Feb 2024	100.0%	94.0%	5.9%	0.1%	0.0%
5 Day Ave.	100.0%	90.8%	9.0%	0.1%	0.2%
7 Day Ave.	100.0%	91.5%	8.3%	0.1%	0.1%

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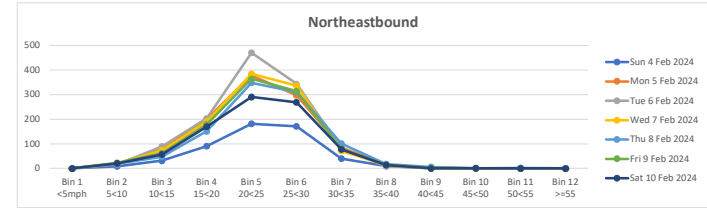


Alton ATC, London Road (Eastern Site)

Direction: Northeastbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5<10	Bin 3 10<15	Bin 4 15<20	Bin 5 20<25	Bin 6 25<30	Bin 7 30<35	Bin 8 35<40	Bin 9 40<45	Bin 10 45<50	Bin 11 50<55	Bin 12 >=55
Sun 4 Feb 2024	533	29.5	23.5	5.8	0	9	31	90	181	171	40	10	1	0	0	0
Mon 5 Feb 2024	1073	29.1	23.0	5.9	0	19	77	201	377	297	85	15	2	0	0	0
Tue 6 Feb 2024	1215	28.8	23.0	5.6	0	16	89	203	470	343	81	9	3	1	0	0
Wed 7 Feb 2024	1090	29.1	23.1	5.7	0	20	73	190	384	336	71	14	1	1	0	0
Thu 8 Feb 2024	1002	30.3	24.0	6.1	0	18	48	151	348	310	101	17	6	1	2	0
Fri 9 Feb 2024	1035	29.3	23.2	5.8	0	22	62	178	364	314	78	15	2	0	0	0
Sat 10 Feb 2024	896	29.4	23.2	6.0	0	20	56	170	290	269	77	13	0	1	0	0
5 Day Ave.	1083	29.3	23.3	5.8	0	19	70	185	389	320	83	14	3	1	0	0
7 Day Ave.	978	29.3	23.3	5.8	0	18	62	169	345	291	76	13	2	1	0	0

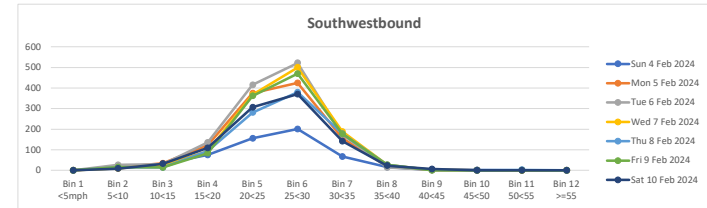
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Direction: Southwestbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5<10	Bin 3 10<15	Bin 4 15<20	Bin 5 20<25	Bin 6 25<30	Bin 7 30<35	Bin 8 35<40	Bin 9 40<45	Bin 10 45<50	Bin 11 50<55	Bin 12 >=55
Sun 4 Feb 2024	562	31.3	24.7	6.4	0	10	31	75	156	201	68	16	2	2	1	0
Mon 5 Feb 2024	1148	30.6	25.0	5.5	0	15	34	122	375	425	156	19	2	0	0	0
Tue 6 Feb 2024	1323	30.7	25.0	5.5	0	27	30	135	416	522	174	15	2	1	1	0
Wed 7 Feb 2024	1214	31.1	25.8	5.2	0	10	27	92	367	500	189	26	3	0	0	0
Thu 8 Feb 2024	995	31.9	25.9	5.8	0	14	15	94	281	380	177	27	3	1	3	0
Fri 9 Feb 2024	1153	31.2	25.8	5.2	0	16	15	84	362	470	178	27	0	1	0	0
Sat 10 Feb 2024	999	31.1	25.3	5.7	0	9	32	109	307	370	142	23	6	1	0	0
5 Day Ave.	1167	31.1	25.5	5.4	0	16	24	105	360	459	175	23	2	1	1	0
7 Day Ave.	1056	31.1	25.3	5.6	0	14	26	102	323	410	155	22	3	1	1	0

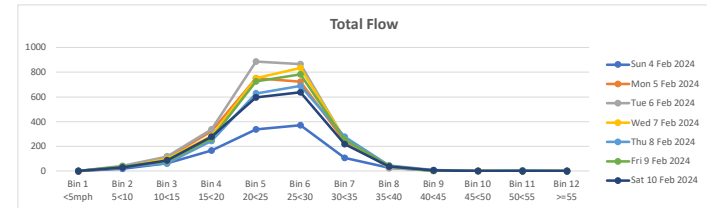
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Direction: Total Flow

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5<10	Bin 3 10<15	Bin 4 15<20	Bin 5 20<25	Bin 6 25<30	Bin 7 30<35	Bin 8 35<40	Bin 9 40<45	Bin 10 45<50	Bin 11 50<55	Bin 12 >=55
Sun 4 Feb 2024	1095	30.4	24.1	6.1	0	19	62	165	337	372	108	26	3	2	1	0
Mon 5 Feb 2024	2221	30.0	24.0	5.7	0	34	111	323	752	722	241	34	4	0	0	0
Tue 6 Feb 2024	2538	29.9	24.0	5.6	0	43	119	338	886	865	255	24	5	2	1	0
Wed 7 Feb 2024	2304	30.3	24.5	5.6	0	30	100	282	751	836	260	40	4	1	0	0
Thu 8 Feb 2024	1997	31.2	25.0	6.0	0	32	63	245	629	690	278	44	9	2	5	0
Fri 9 Feb 2024	2188	30.4	24.6	5.6	0	38	77	262	726	784	256	42	2	1	0	0
Sat 10 Feb 2024	1895	30.4	24.3	5.9	0	29	88	279	597	639	219	36	6	2	0	0
5 Day Ave.	2250	30.4	24.4	5.7	0	35	94	290	749	779	258	37	5	1	1	0
7 Day Ave.	2034	30.4	24.4	5.8	0	32	89	271	668	701	231	35	5	1	1	0

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Appendix B

Alton ATC, London Road (Western Site)

Direction: Northeastbound

	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	773	733	40	0	0
Mon 5 Feb 2024	1359	1218	138	0	3
Tue 6 Feb 2024	1481	1352	128	0	1
Wed 7 Feb 2024	1398	1298	95	2	3
Thu 8 Feb 2024	1339	1228	108	0	3
Fri 9 Feb 2024	1520	1432	88	0	0
Sat 10 Feb 2024	1318	1252	64	1	1
5 Day Ave.	1419	1306	111	0	2
7 Day Ave.	1313	1216	94	0	2

Direction: Southwestbound

	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	791	742	48	1	0
Mon 5 Feb 2024	1388	1229	157	0	2
Tue 6 Feb 2024	1558	1394	155	1	8
Wed 7 Feb 2024	1522	1367	154	0	1
Thu 8 Feb 2024	1335	1163	167	1	4
Fri 9 Feb 2024	1547	1364	179	0	4
Sat 10 Feb 2024	1335	1186	146	0	3
5 Day Ave.	1470	1303	162	0	4
7 Day Ave.	1354	1206	144	0	3

Direction: Total Flow

	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	1564	1475	88	1	0
Mon 5 Feb 2024	2747	2447	295	0	5
Tue 6 Feb 2024	3039	2746	283	1	9
Wed 7 Feb 2024	2920	2665	249	2	4
Thu 8 Feb 2024	2674	2391	275	1	7
Fri 9 Feb 2024	3067	2796	267	0	4
Sat 10 Feb 2024	2653	2438	210	1	4
5 Day Ave.	2889	2609	274	1	6
7 Day Ave.	2666	2423	238	1	5

	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	100.0%	94.8%	5.2%	0.0%	0.0%
Mon 5 Feb 2024	100.0%	89.6%	10.2%	0.0%	0.2%
Tue 6 Feb 2024	100.0%	91.3%	8.6%	0.0%	0.1%
Wed 7 Feb 2024	100.0%	92.8%	6.8%	0.1%	0.2%
Thu 8 Feb 2024	100.0%	91.7%	8.1%	0.0%	0.2%
Fri 9 Feb 2024	100.0%	94.2%	5.8%	0.0%	0.0%
Sat 10 Feb 2024	100.0%	95.0%	4.9%	0.1%	0.1%
5 Day Ave.	100.0%	92.0%	7.8%	0.0%	0.1%
7 Day Ave.	100.0%	92.7%	7.2%	0.0%	0.1%

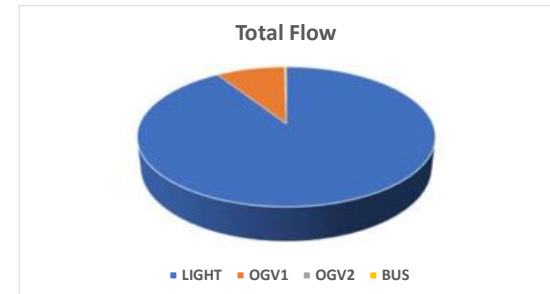
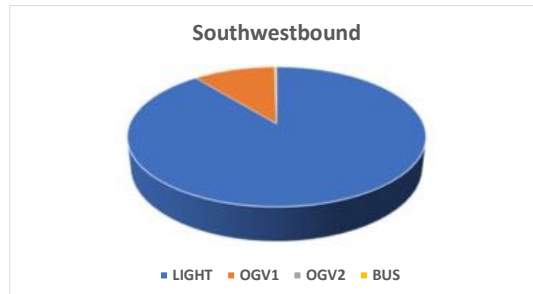
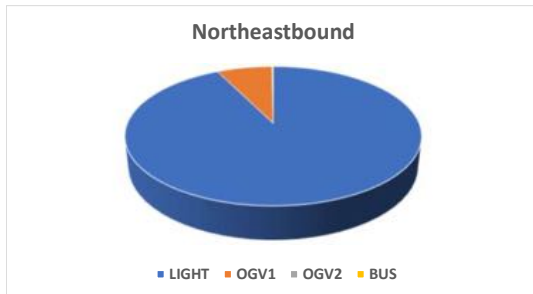
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	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	100.0%	93.8%	6.1%	0.1%	0.0%
Mon 5 Feb 2024	100.0%	88.5%	11.3%	0.0%	0.1%
Tue 6 Feb 2024	100.0%	89.5%	9.9%	0.1%	0.5%
Wed 7 Feb 2024	100.0%	89.8%	10.1%	0.0%	0.1%
Thu 8 Feb 2024	100.0%	87.1%	12.5%	0.1%	0.3%
Fri 9 Feb 2024	100.0%	88.2%	11.6%	0.0%	0.3%
Sat 10 Feb 2024	100.0%	88.8%	10.9%	0.0%	0.2%
5 Day Ave.	100.0%	88.7%	11.0%	0.0%	0.3%
7 Day Ave.	100.0%	89.1%	10.6%	0.0%	0.2%

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	Total Volume	LIGHT	OGV1	OGV2	BUS
Sun 4 Feb 2024	100.0%	94.3%	5.6%	0.1%	0.0%
Mon 5 Feb 2024	100.0%	89.1%	10.7%	0.0%	0.2%
Tue 6 Feb 2024	100.0%	90.4%	9.3%	0.0%	0.3%
Wed 7 Feb 2024	100.0%	91.3%	8.5%	0.1%	0.1%
Thu 8 Feb 2024	100.0%	89.4%	10.3%	0.0%	0.3%
Fri 9 Feb 2024	100.0%	91.2%	8.7%	0.0%	0.1%
Sat 10 Feb 2024	100.0%	91.9%	7.9%	0.0%	0.2%
5 Day Ave.	100.0%	90.3%	9.5%	0.0%	0.2%
7 Day Ave.	100.0%	90.9%	8.9%	0.0%	0.2%

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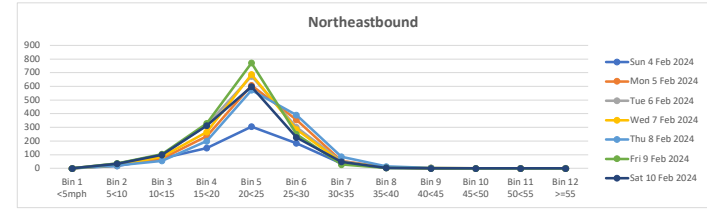


Alton ATC, London Road (Western Site)

Direction: Northeastbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5<10	Bin 3 10<15	Bin 4 15<20	Bin 5 20<25	Bin 6 25<30	Bin 7 30<35	Bin 8 35<40	Bin 9 40<45	Bin 10 45<50	Bin 11 50<55	Bin 12 >=55
Sun 4 Feb 2024	773	27.9	22.1	5.7	0	17	74	149	306	184	35	7	1	0	0	0
Mon 5 Feb 2024	1359	28.0	22.7	5.1	0	26	71	234	608	354	55	9	2	0	0	0
Tue 6 Feb 2024	1481	27.3	21.9	5.2	0	35	96	316	674	301	53	4	1	0	0	1
Wed 7 Feb 2024	1398	27.3	22.1	5.0	0	23	85	266	687	283	45	6	3	0	0	0
Thu 8 Feb 2024	1339	28.9	23.4	5.3	0	21	55	199	572	390	84	14	4	0	0	0
Fri 9 Feb 2024	1520	26.4	21.4	4.8	0	37	103	328	772	249	28	3	0	0	0	0
Sat 10 Feb 2024	1318	26.8	21.5	5.1	0	33	98	312	598	226	47	4	0	0	0	0
5 Day Ave.	1419	27.6	22.3	5.1	0	28	82	269	663	315	53	7	2	0	0	0
7 Day Ave.	1313	27.5	22.1	5.2	0	27	83	258	602	284	50	7	2	0	0	0

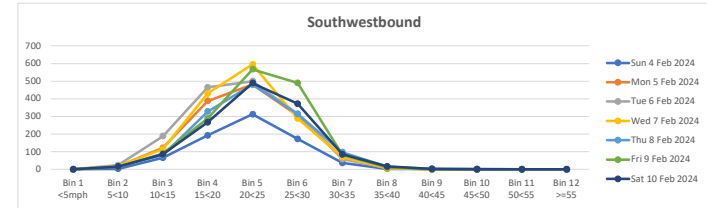
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Direction: Southwestbound

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5<10	Bin 3 10<15	Bin 4 15<20	Bin 5 20<25	Bin 6 25<30	Bin 7 30<35	Bin 8 35<40	Bin 9 40<45	Bin 10 45<50	Bin 11 50<55	Bin 12 >=55
Sun 4 Feb 2024	791	27.7	22.1	5.4	0	3	66	193	312	173	36	3	3	2	0	0
Mon 5 Feb 2024	1388	27.3	21.7	5.4	0	17	122	388	481	305	68	7	0	0	0	0
Tue 6 Feb 2024	1558	26.9	21.1	5.6	0	24	188	465	500	314	58	7	1	0	0	1
Wed 7 Feb 2024	1522	27.0	21.6	5.2	0	18	114	430	595	289	70	6	0	0	0	0
Thu 8 Feb 2024	1335	28.4	22.6	5.6	0	17	80	328	481	314	98	15	2	0	0	0
Fri 9 Feb 2024	1547	28.6	23.1	5.3	0	14	90	289	567	491	83	12	0	0	0	1
Sat 10 Feb 2024	1335	28.7	22.9	5.5	0	16	86	268	489	372	85	17	2	0	0	0
5 Day Ave.	1470	27.6	22.0	5.4	0	18	119	380	525	343	75	9	1	0	0	0
7 Day Ave.	1354	27.8	22.2	5.4	0	16	107	337	489	323	71	10	1	0	0	0

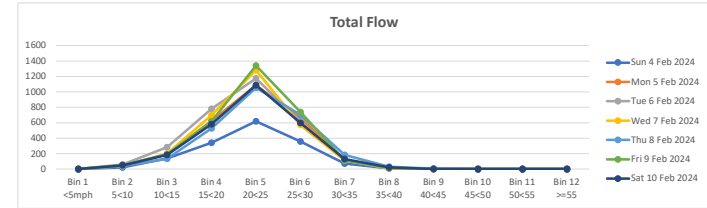
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Direction: Total Flow

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5mph	Bin 2 5<10	Bin 3 10<15	Bin 4 15<20	Bin 5 20<25	Bin 6 25<30	Bin 7 30<35	Bin 8 35<40	Bin 9 40<45	Bin 10 45<50	Bin 11 50<55	Bin 12 >=55
Sun 4 Feb 2024	1564	27.8	22.1	5.5	0	20	140	342	618	357	71	10	4	2	0	0
Mon 5 Feb 2024	2747	27.7	22.2	5.3	0	43	193	622	1089	659	123	16	2	0	0	0
Tue 6 Feb 2024	3039	27.1	21.5	5.5	0	59	284	781	1174	615	111	11	2	0	0	2
Wed 7 Feb 2024	2920	27.1	21.9	5.1	0	41	199	696	1282	572	115	12	3	0	0	0
Thu 8 Feb 2024	2674	28.6	23.0	5.4	0	38	135	527	1053	704	182	29	6	0	0	0
Fri 9 Feb 2024	3067	27.6	22.3	5.1	0	51	193	617	1339	740	111	15	0	0	0	1
Sat 10 Feb 2024	2653	27.8	22.2	5.4	0	49	184	580	1087	598	132	21	2	0	0	0
5 Day Ave.	2889	27.6	22.2	5.3	0	46	201	649	1187	658	128	17	3	0	0	1
7 Day Ave.	2666	27.7	22.2	5.3	0	43	190	595	1092	606	121	16	3	0	0	0

Paul Castle Associates



Appendix C

Alton, Thursday 8th February 2024

Junction: 1
 Approach: London Road West



TIME	Left to London Road (North)					Ahead to Montecchio Way				
	LIGHT	HEAVY	BUS	TOTAL	PCUs	LIGHT	HEAVY	BUS	TOTAL	PCUs
07:00 - 07:15	12	0	0	12	12.0	97	1	0	98	99.3
07:15 - 07:30	16	0	0	16	16.0	109	0	1	110	111.0
07:30 - 07:45	22	0	0	22	22.0	123	1	0	124	125.3
07:45 - 08:00	17	0	0	17	17.0	143	1	0	144	145.3
Hourly Total	67	0	0	67	67.0	472	3	1	476	480.9
08:00 - 08:15	26	0	0	26	26.0	136	2	0	138	140.6
08:15 - 08:30	27	0	0	27	27.0	82	0	0	82	82.0
08:30 - 08:45	46	1	0	47	48.3	102	1	1	104	106.3
08:45 - 09:00	42	0	0	42	42.0	107	0	0	107	107.0
Hourly Total	141	1	0	142	143.3	427	3	1	431	435.9
09:00 - 09:15	20	1	0	21	22.3	67	4	1	72	78.2
09:15 - 09:30	21	0	1	22	23.0	80	1	0	81	82.3
09:30 - 09:45	25	0	0	25	25.0	72	0	0	72	72.0
09:45 - 10:00	23	0	1	24	25.0	76	1	1	78	80.3
Hourly Total	89	1	2	92	95.3	295	6	2	303	312.8

PCU Factors:	
LIGHT	1.0
HEAVY	2.3
BUS	2.0

TOTAL	297	2	2	301	305.6	1194	12	4	1210	1229.6
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14:00 - 14:15	23	0	0	23	23.0	80	0	0	80	80.0
14:15 - 14:30	23	0	0	23	23.0	65	0	0	65	65.0
14:30 - 14:45	32	0	0	32	32.0	103	1	0	104	105.3
14:45 - 15:00	31	0	0	31	31.0	99	0	1	100	101.0
Hourly Total	109	0	0	109	109.0	347	1	1	349	351.3
15:00 - 15:15	34	0	1	35	36.0	88	0	0	88	88.0
15:15 - 15:30	37	0	0	37	37.0	71	0	0	71	71.0
15:30 - 15:45	36	0	0	36	36.0	89	1	0	90	91.3
15:45 - 16:00	37	0	0	37	37.0	103	0	1	104	105.0
Hourly Total	144	0	1	145	146.0	351	1	1	353	355.3
16:00 - 16:15	35	0	0	35	35.0	107	0	0	107	107.0
16:15 - 16:30	34	0	0	34	34.0	108	1	0	109	110.3
16:30 - 16:45	31	0	2	33	35.0	101	1	0	102	103.3
16:45 - 17:00	27	0	0	27	27.0	97	0	1	98	99.0
Hourly Total	127	0	2	129	131.0	413	2	1	416	419.6
17:00 - 17:15	30	0	0	30	30.0	85	0	0	85	85.0
17:15 - 17:30	32	0	0	32	32.0	79	0	0	79	79.0
17:30 - 17:45	31	0	0	31	31.0	78	0	0	78	78.0
17:45 - 18:00	30	0	0	30	30.0	77	0	0	77	77.0
Hourly Total	123	0	0	123	123.0	319	0	0	319	319.0
18:00 - 18:15	31	0	0	31	31.0	78	1	0	79	80.3
18:15 - 18:30	19	0	0	19	19.0	80	0	1	81	82.0
18:30 - 18:45	22	0	0	22	22.0	58	0	0	58	58.0
18:45 - 19:00	28	0	0	28	28.0	36	0	0	36	36.0
Hourly Total	100	0	0	100	100.0	252	1	1	254	256.3

TOTAL	603	0	3	606	609.0	1682	5	4	1691	1701.5
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Alton, Thursday 8th February 2024

Junction: 1
 Approach: London Road North



TIME	Left to Montecchio Way					Right to London Road (West)				
	LIGHT	HEAVY	BUS	TOTAL	PCUs	LIGHT	HEAVY	BUS	TOTAL	PCUs
07:00 - 07:15	22	0	0	22	22.0	12	0	0	12	12.0
07:15 - 07:30	16	0	0	16	16.0	14	0	0	14	14.0
07:30 - 07:45	29	0	0	29	29.0	25	0	0	25	25.0
07:45 - 08:00	28	0	0	28	28.0	26	0	0	26	26.0
Hourly Total	95	0	0	95	95.0	77	0	0	77	77.0
08:00 - 08:15	33	0	0	33	33.0	35	0	0	35	35.0
08:15 - 08:30	38	0	1	39	40.0	53	1	3	57	61.3
08:30 - 08:45	24	2	0	26	28.6	35	1	0	36	37.3
08:45 - 09:00	38	0	0	38	38.0	72	0	0	72	72.0
Hourly Total	133	2	1	136	139.6	195	2	3	200	205.6
09:00 - 09:15	28	0	0	28	28.0	32	0	0	32	32.0
09:15 - 09:30	20	0	0	20	20.0	26	0	1	27	28.0
09:30 - 09:45	17	0	0	17	17.0	28	0	1	29	30.0
09:45 - 10:00	19	0	0	19	19.0	27	0	0	27	27.0
Hourly Total	84	0	0	84	84.0	113	0	2	115	117.0

PCU Factors:	
LIGHT	1.0
HEAVY	2.3
BUS	2.0

TOTAL	312	2	1	315	318.6	385	2	5	392	399.6
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14:00 - 14:15	29	0	0	29	29.0	25	0	0	25	25.0
14:15 - 14:30	25	0	0	25	25.0	23	0	0	23	23.0
14:30 - 14:45	51	0	1	52	53.0	52	0	1	53	54.0
14:45 - 15:00	16	1	0	17	18.3	37	0	0	37	37.0
Hourly Total	121	1	1	123	125.3	137	0	1	138	139.0
15:00 - 15:15	18	1	0	19	20.3	32	0	1	33	34.0
15:15 - 15:30	17	0	0	17	17.0	29	0	0	29	29.0
15:30 - 15:45	25	0	0	25	25.0	31	0	0	31	31.0
15:45 - 16:00	33	1	0	34	35.3	32	1	0	33	34.3
Hourly Total	93	2	0	95	97.6	124	1	1	126	128.3
16:00 - 16:15	39	1	0	40	41.3	33	1	0	34	35.3
16:15 - 16:30	44	0	0	44	44.0	35	0	0	35	35.0
16:30 - 16:45	35	0	0	35	35.0	37	0	0	37	37.0
16:45 - 17:00	28	0	0	28	28.0	39	0	0	39	39.0
Hourly Total	146	1	0	147	148.3	144	1	0	145	146.3
17:00 - 17:15	25	0	0	25	25.0	37	0	0	37	37.0
17:15 - 17:30	23	0	0	23	23.0	39	0	0	39	39.0
17:30 - 17:45	22	0	0	22	22.0	38	0	0	38	38.0
17:45 - 18:00	24	0	0	24	24.0	39	0	0	39	39.0
Hourly Total	94	0	0	94	94.0	153	0	0	153	153.0
18:00 - 18:15	18	0	0	18	18.0	35	0	0	35	35.0
18:15 - 18:30	23	0	0	23	23.0	20	0	0	20	20.0
18:30 - 18:45	23	0	0	23	23.0	24	0	0	24	24.0
18:45 - 19:00	22	0	0	22	22.0	39	0	0	39	39.0
Hourly Total	86	0	0	86	86.0	118	0	0	118	118.0

TOTAL	540	4	1	545	551.2	676	2	2	680	684.6
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Alton, Thursday 8th February 2024

Junction: 1
 Approach: Montecchio Way



TIME	Ahead to London Road (West)					Right to London Road (North)				
	LIGHT	HEAVY	BUS	TOTAL	PCUs	LIGHT	HEAVY	BUS	TOTAL	PCUs
07:00 - 07:15	18	1	1	20	22.3	8	0	0	8	8.0
07:15 - 07:30	66	2	0	68	70.6	16	0	0	16	16.0
07:30 - 07:45	60	1	0	61	62.3	26	0	0	26	26.0
07:45 - 08:00	109	1	0	110	111.3	32	2	0	34	36.6
Hourly Total	253	5	1	259	266.5	82	2	0	84	86.6
08:00 - 08:15	127	1	2	130	133.3	28	0	0	28	28.0
08:15 - 08:30	143	0	1	144	145.0	53	0	0	53	53.0
08:30 - 08:45	93	2	0	95	97.6	63	0	0	63	63.0
08:45 - 09:00	86	0	0	86	86.0	51	0	0	51	51.0
Hourly Total	449	3	3	455	461.9	195	0	0	195	195.0
09:00 - 09:15	88	0	0	88	88.0	28	1	0	29	30.3
09:15 - 09:30	90	4	0	94	99.2	28	0	0	28	28.0
09:30 - 09:45	73	2	0	75	77.6	16	0	0	16	16.0
09:45 - 10:00	89	1	1	91	93.3	17	0	0	17	17.0
Hourly Total	340	7	1	348	358.1	89	1	0	90	91.3

PCU Factors:	
LIGHT	1.0
HEAVY	2.3
BUS	2.0

TOTAL	1042	15	5	1062	1086.5	366	3	0	369	372.9
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14:00 - 14:15	81	1	0	82	83.3	17	0	0	17	17.0
14:15 - 14:30	98	0	2	100	102.0	21	0	0	21	21.0
14:30 - 14:45	92	0	1	93	94.0	21	2	0	23	25.6
14:45 - 15:00	85	1	0	86	87.3	26	0	0	26	26.0
Hourly Total	356	2	3	361	366.6	85	2	0	87	89.6
15:00 - 15:15	92	0	1	93	94.0	29	0	0	29	29.0
15:15 - 15:30	100	1	0	101	102.3	30	1	0	31	32.3
15:30 - 15:45	107	0	1	108	109.0	27	1	0	28	29.3
15:45 - 16:00	124	0	0	124	124.0	24	0	0	24	24.0
Hourly Total	423	1	2	426	429.3	110	2	0	112	114.6
16:00 - 16:15	110	1	0	111	112.3	23	0	0	23	23.0
16:15 - 16:30	103	1	1	105	107.3	20	0	0	20	20.0
16:30 - 16:45	108	2	2	112	116.6	22	0	0	22	22.0
16:45 - 17:00	105	0	0	105	105.0	24	0	0	24	24.0
Hourly Total	426	4	3	433	441.2	89	0	0	89	89.0
17:00 - 17:15	150	0	0	150	150.0	26	0	0	26	26.0
17:15 - 17:30	168	0	0	168	168.0	25	0	0	25	25.0
17:30 - 17:45	144	0	0	144	144.0	20	0	0	20	20.0
17:45 - 18:00	112	0	0	112	112.0	18	0	0	18	18.0
Hourly Total	574	0	0	574	574.0	89	0	0	89	89.0
18:00 - 18:15	122	0	1	123	124.0	17	0	0	17	17.0
18:15 - 18:30	93	0	0	93	93.0	17	0	0	17	17.0
18:30 - 18:45	84	0	0	84	84.0	15	0	0	15	15.0
18:45 - 19:00	81	0	0	81	81.0	25	0	0	25	25.0
Hourly Total	380	0	1	381	382.0	74	0	0	74	74.0

TOTAL	2159	7	9	2175	2193.1	447	4	0	451	456.2
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Alton, Thursday 8th February 2024

From: 1) 08:00

To: 1) 09:00

Class: All Vehicles

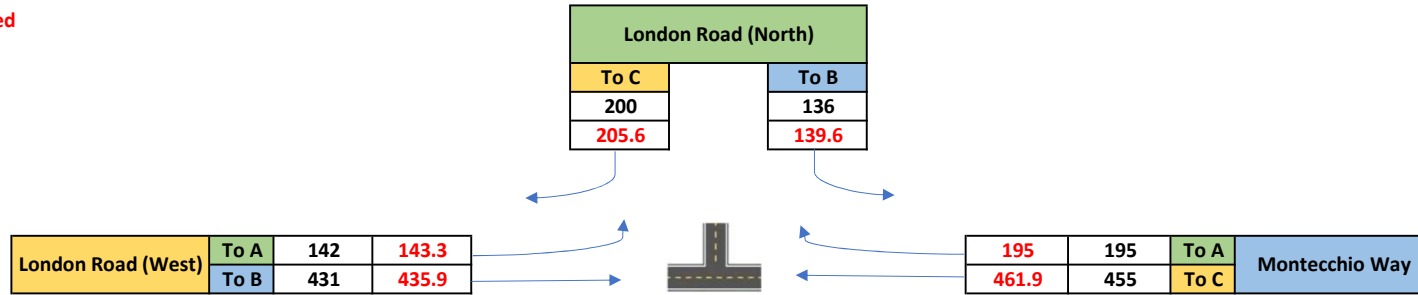
Show Peak Hour:

Show PCUs:

Show Session 2



PCUs in red



Alton, Thursday 8th February 2024

From: 2) 15:45

To: 2) 16:45

Class: All Vehicles

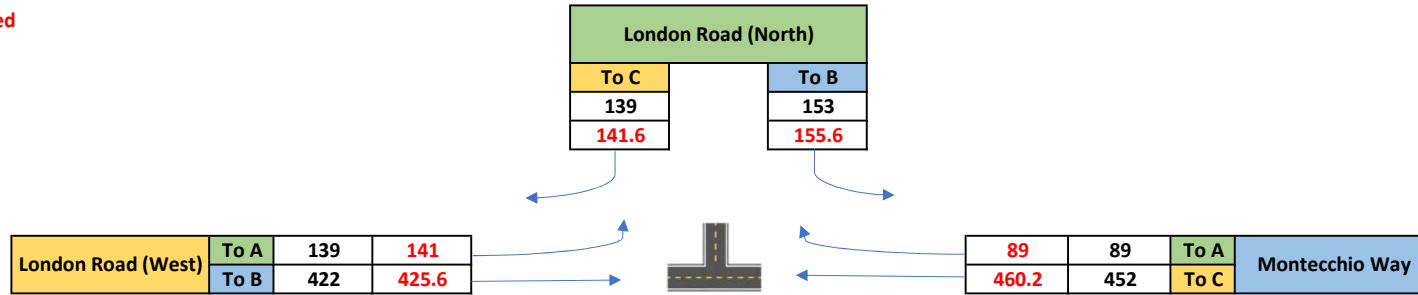
Show Peak Hour:

Show PCUs:

Show Session 1



PCUs in red



Alton, Thursday 8th February 2024



Site 1

Queues are stationary vehicles each 5 minutes

TIME	London Road (North)	Montecchio Way	London Road (West)
07:00	0	3	5
07:05	5	0	0
07:10	0	3	6
07:15	5	0	0
07:20	0	4	7
07:25	0	4	4
07:30	6	0	0
07:35	6	0	0
07:40	0	5	7
07:45	7	0	0
07:50	0	5	7
07:55	5	0	0
08:00	0	6	8
08:05	11	0	0
08:10	0	10	5
08:15	0	11	9
08:20	13	0	0
08:25	0	13	7
08:30	11	0	0
08:35	0	12	7
08:40	12	0	0
08:45	0	11	7
08:50	13	0	0
08:55	0	12	8
09:00	10	0	0
09:05	0	9	5
09:10	8	0	0
09:15	9	0	0
09:20	0	10	7
09:25	0	9	6
09:30	8	0	0
09:35	0	8	8
09:40	8	0	0
09:45	0	8	7
09:50	7	0	0
09:55	0	5	7
10:00	7	0	0

14:00	5	0	0
14:05	0	6	5
14:10	0	6	6
14:15	7	0	0
14:20	0	7	6
14:25	7	0	0
14:30	0	7	7
14:35	8	0	0
14:40	8	0	0
14:45	0	7	9
14:50	10	0	0
14:55	0	7	7
15:00	0	7	4
15:05	7	0	0
15:10	0	8	9
15:15	10	0	0
15:20	0	8	8
15:25	0	5	11
15:30	13	0	0
15:35	0	6	7
15:40	12	0	0
15:45	13	0	0
15:50	0	5	10
15:55	0	10	11
16:00	14	0	0
16:05	7	0	0
16:10	0	12	7
16:15	0	12	10
16:20	15	0	0
16:25	0	13	8
16:30	12	0	0
16:35	0	11	13
16:40	14	0	0
16:45	0	13	10
16:50	13	0	0
16:55	10	0	0
17:00	0	11	11
17:05	8	0	0
17:10	0	8	10
17:15	0	9	7
17:20	11	0	0
17:25	13	0	0
17:30	0	6	8
17:35	0	6	7
17:40	8	0	0
17:45	5	0	0
17:50	0	5	6
17:55	7	0	0
18:00	0	7	5
18:05	9	0	0
18:10	0	6	7
18:15	9	0	0
18:20	0	5	6
18:25	8	0	0
18:30	6	0	0
18:35	0	6	5
18:40	7	0	0
18:45	0	6	2
18:50	7	0	0
18:55	0	6	5
19:00	0	5	3

Appendix D

Calculation Reference: AUDIT-247601-240223-0224

TRIP RATE CALCULATION SELECTION PARAMETERS:

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

MULTI-MODAL TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	KC KENT	1 days
	SC SURREY	1 days
	SP SOUTHAMPTON	1 days
	WS WEST SUSSEX	1 days
04	EAST ANGLIA	
	NF NORFOLK	1 days

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

Primary Filtering selection:

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

Parameter: No of Dwellings
 Actual Range: 125 to 250 (units:)
 Range Selected by User: 100 to 300 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/15 to 04/07/23

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

Selected survey days:

Monday 1 days
 Tuesday 3 days
 Wednesday 1 days

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

Selected survey types:

Manual count 5 days
 Directional ATC Count 0 days

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

Selected Locations:

Edge of Town 1
 Neighbourhood Centre (PPS6 Local Centre) 4

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

Selected Location Sub Categories:

Village 4
 Out of Town 1

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

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included 1 days - Selected
 Servicing vehicles Excluded 7 days - Selected

Secondary Filtering selection:Use Class:

C3 5 days

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

Population within 500m Range:

All Surveys Included

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

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

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

Population within 5 miles:

25,001 to 50,000	2 days
75,001 to 100,000	1 days
100,001 to 125,000	1 days
250,001 to 500,000	1 days

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

Car ownership within 5 miles:

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

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

Travel Plan:

Yes	4 days
No	1 days

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

PTAL Rating:

No PTAL Present	5 days
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This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

<p>1 KC-03-A-08 MIXED HOUSES MAIDSTONE ROAD CHARING</p> <p>Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 159 Survey date: TUESDAY 22/05/18</p>	<p>KENT</p> <p>Survey Type: MANUAL</p>
<p>2 NF-03-A-43 MIXED HOUSES MILL LANE NEAR NORWICH HORSFORD Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 125 Survey date: WEDNESDAY 15/09/21</p>	<p>NORFOLK</p> <p>Survey Type: MANUAL</p>
<p>3 SC-03-A-09 MIXED HOUSES & FLATS AMLETS LANE CRANLEIGH</p> <p>Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 136 Survey date: TUESDAY 24/05/22</p>	<p>SURREY</p> <p>Survey Type: MANUAL</p>
<p>4 SP-03-A-02 MIXED HOUSES & FLATS BARNFIELD WAY NEAR SOUTHAMPTON HEDGE END Edge of Town Out of Town Total No of Dwellings: 250 Survey date: TUESDAY 12/10/21</p>	<p>SOUTHAMPTON</p> <p>Survey Type: MANUAL</p>
<p>5 WS-03-A-18 MIXED HOUSES & FLATS LONDON ROAD HASSOCKS</p> <p>Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 156 Survey date: MONDAY 15/05/23</p>	<p>WEST SUSSEX</p> <p>Survey Type: MANUAL</p>

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

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
HC-03-A-26	COVID
WS-03-A-12	COVID

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

MULTI-MODAL TOTAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Total People to Total Vehicles ratio (all time periods and directions): 1.64

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.085	5	165	0.269	5	165	0.354
08:00 - 09:00	5	165	0.144	5	165	0.377	5	165	0.521
09:00 - 10:00	5	165	0.121	5	165	0.167	5	165	0.288
10:00 - 11:00	5	165	0.136	5	165	0.169	5	165	0.305
11:00 - 12:00	5	165	0.128	5	165	0.182	5	165	0.310
12:00 - 13:00	5	165	0.157	5	165	0.162	5	165	0.319
13:00 - 14:00	5	165	0.159	5	165	0.150	5	165	0.309
14:00 - 15:00	5	165	0.148	5	165	0.169	5	165	0.317
15:00 - 16:00	5	165	0.247	5	165	0.150	5	165	0.397
16:00 - 17:00	5	165	0.248	5	165	0.178	5	165	0.426
17:00 - 18:00	5	165	0.326	5	165	0.143	5	165	0.469
18:00 - 19:00	5	165	0.252	5	165	0.130	5	165	0.382
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.151			2.246			4.397

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

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

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Parameter summary

Trip rate parameter range selected: 125 - 250 (units:)
 Survey date date range: 01/01/15 - 04/07/23
 Number of weekdays (Monday-Friday): 5
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 1
 Surveys manually removed from selection: 2

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

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

MULTI-MODAL TAXIS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.001	5	165	0.002	5	165	0.003
08:00 - 09:00	5	165	0.008	5	165	0.008	5	165	0.016
09:00 - 10:00	5	165	0.001	5	165	0.001	5	165	0.002
10:00 - 11:00	5	165	0.001	5	165	0.001	5	165	0.002
11:00 - 12:00	5	165	0.002	5	165	0.002	5	165	0.004
12:00 - 13:00	5	165	0.001	5	165	0.001	5	165	0.002
13:00 - 14:00	5	165	0.002	5	165	0.002	5	165	0.004
14:00 - 15:00	5	165	0.001	5	165	0.001	5	165	0.002
15:00 - 16:00	5	165	0.008	5	165	0.007	5	165	0.015
16:00 - 17:00	5	165	0.004	5	165	0.004	5	165	0.008
17:00 - 18:00	5	165	0.001	5	165	0.001	5	165	0.002
18:00 - 19:00	5	165	0.001	5	165	0.000	5	165	0.001
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.031			0.030			0.061

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

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

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

MULTI-MODAL OGVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.000	5	165	0.000	5	165	0.000
08:00 - 09:00	5	165	0.001	5	165	0.001	5	165	0.002
09:00 - 10:00	5	165	0.005	5	165	0.004	5	165	0.009
10:00 - 11:00	5	165	0.004	5	165	0.002	5	165	0.006
11:00 - 12:00	5	165	0.002	5	165	0.004	5	165	0.006
12:00 - 13:00	5	165	0.005	5	165	0.004	5	165	0.009
13:00 - 14:00	5	165	0.000	5	165	0.002	5	165	0.002
14:00 - 15:00	5	165	0.001	5	165	0.000	5	165	0.001
15:00 - 16:00	5	165	0.000	5	165	0.001	5	165	0.001
16:00 - 17:00	5	165	0.000	5	165	0.000	5	165	0.000
17:00 - 18:00	5	165	0.000	5	165	0.000	5	165	0.000
18:00 - 19:00	5	165	0.000	5	165	0.000	5	165	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.018			0.018			0.036

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

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

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

MULTI-MODAL CYCLISTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.000	5	165	0.008	5	165	0.008
08:00 - 09:00	5	165	0.004	5	165	0.012	5	165	0.016
09:00 - 10:00	5	165	0.000	5	165	0.001	5	165	0.001
10:00 - 11:00	5	165	0.002	5	165	0.000	5	165	0.002
11:00 - 12:00	5	165	0.001	5	165	0.000	5	165	0.001
12:00 - 13:00	5	165	0.000	5	165	0.002	5	165	0.002
13:00 - 14:00	5	165	0.001	5	165	0.002	5	165	0.003
14:00 - 15:00	5	165	0.002	5	165	0.005	5	165	0.007
15:00 - 16:00	5	165	0.016	5	165	0.001	5	165	0.017
16:00 - 17:00	5	165	0.013	5	165	0.016	5	165	0.029
17:00 - 18:00	5	165	0.007	5	165	0.004	5	165	0.011
18:00 - 19:00	5	165	0.005	5	165	0.001	5	165	0.006
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.051			0.052			0.103

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

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

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

MULTI-MODAL VEHICLE OCCUPANTS

Calculation factor: **1 DWELLS**

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.092	5	165	0.379	5	165	0.471
08:00 - 09:00	5	165	0.162	5	165	0.603	5	165	0.765
09:00 - 10:00	5	165	0.150	5	165	0.251	5	165	0.401
10:00 - 11:00	5	165	0.168	5	165	0.254	5	165	0.422
11:00 - 12:00	5	165	0.173	5	165	0.247	5	165	0.420
12:00 - 13:00	5	165	0.201	5	165	0.223	5	165	0.424
13:00 - 14:00	5	165	0.226	5	165	0.202	5	165	0.428
14:00 - 15:00	5	165	0.211	5	165	0.231	5	165	0.442
15:00 - 16:00	5	165	0.407	5	165	0.211	5	165	0.618
16:00 - 17:00	5	165	0.396	5	165	0.232	5	165	0.628
17:00 - 18:00	5	165	0.508	5	165	0.179	5	165	0.687
18:00 - 19:00	5	165	0.385	5	165	0.165	5	165	0.550
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.079			3.177			6.256

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

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

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

MULTI-MODAL PEDESTRIANS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.007	5	165	0.028	5	165	0.035
08:00 - 09:00	5	165	0.021	5	165	0.084	5	165	0.105
09:00 - 10:00	5	165	0.030	5	165	0.048	5	165	0.078
10:00 - 11:00	5	165	0.024	5	165	0.025	5	165	0.049
11:00 - 12:00	5	165	0.022	5	165	0.018	5	165	0.040
12:00 - 13:00	5	165	0.018	5	165	0.028	5	165	0.046
13:00 - 14:00	5	165	0.028	5	165	0.024	5	165	0.052
14:00 - 15:00	5	165	0.024	5	165	0.039	5	165	0.063
15:00 - 16:00	5	165	0.090	5	165	0.027	5	165	0.117
16:00 - 17:00	5	165	0.027	5	165	0.018	5	165	0.045
17:00 - 18:00	5	165	0.029	5	165	0.018	5	165	0.047
18:00 - 19:00	5	165	0.029	5	165	0.017	5	165	0.046
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.349			0.374			0.723

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

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

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

MULTI-MODAL BUS/TRAM PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.000	5	165	0.019	5	165	0.019
08:00 - 09:00	5	165	0.000	5	165	0.005	5	165	0.005
09:00 - 10:00	5	165	0.000	5	165	0.008	5	165	0.008
10:00 - 11:00	5	165	0.004	5	165	0.004	5	165	0.008
11:00 - 12:00	5	165	0.005	5	165	0.004	5	165	0.009
12:00 - 13:00	5	165	0.004	5	165	0.004	5	165	0.008
13:00 - 14:00	5	165	0.005	5	165	0.001	5	165	0.006
14:00 - 15:00	5	165	0.002	5	165	0.001	5	165	0.003
15:00 - 16:00	5	165	0.019	5	165	0.001	5	165	0.020
16:00 - 17:00	5	165	0.008	5	165	0.001	5	165	0.009
17:00 - 18:00	5	165	0.002	5	165	0.000	5	165	0.002
18:00 - 19:00	5	165	0.001	5	165	0.001	5	165	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.050			0.049			0.099

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

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

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

MULTI-MODAL TOTAL RAIL PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.000	5	165	0.001	5	165	0.001
08:00 - 09:00	5	165	0.001	5	165	0.004	5	165	0.005
09:00 - 10:00	5	165	0.000	5	165	0.000	5	165	0.000
10:00 - 11:00	5	165	0.000	5	165	0.000	5	165	0.000
11:00 - 12:00	5	165	0.000	5	165	0.000	5	165	0.000
12:00 - 13:00	5	165	0.001	5	165	0.001	5	165	0.002
13:00 - 14:00	5	165	0.000	5	165	0.000	5	165	0.000
14:00 - 15:00	5	165	0.000	5	165	0.000	5	165	0.000
15:00 - 16:00	5	165	0.000	5	165	0.000	5	165	0.000
16:00 - 17:00	5	165	0.001	5	165	0.000	5	165	0.001
17:00 - 18:00	5	165	0.001	5	165	0.000	5	165	0.001
18:00 - 19:00	5	165	0.000	5	165	0.000	5	165	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.004			0.006			0.010

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

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

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

MULTI-MODAL PUBLIC TRANSPORT USERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.000	5	165	0.021	5	165	0.021
08:00 - 09:00	5	165	0.001	5	165	0.008	5	165	0.009
09:00 - 10:00	5	165	0.000	5	165	0.008	5	165	0.008
10:00 - 11:00	5	165	0.004	5	165	0.004	5	165	0.008
11:00 - 12:00	5	165	0.005	5	165	0.004	5	165	0.009
12:00 - 13:00	5	165	0.005	5	165	0.005	5	165	0.010
13:00 - 14:00	5	165	0.005	5	165	0.001	5	165	0.006
14:00 - 15:00	5	165	0.002	5	165	0.001	5	165	0.003
15:00 - 16:00	5	165	0.019	5	165	0.001	5	165	0.020
16:00 - 17:00	5	165	0.010	5	165	0.001	5	165	0.011
17:00 - 18:00	5	165	0.004	5	165	0.000	5	165	0.004
18:00 - 19:00	5	165	0.001	5	165	0.001	5	165	0.002
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.056			0.055			0.111

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

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

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

MULTI-MODAL TOTAL PEOPLE

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Total People to Total Vehicles ratio (all time periods and directions): 1.64

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.099	5	165	0.436	5	165	0.535
08:00 - 09:00	5	165	0.188	5	165	0.707	5	165	0.895
09:00 - 10:00	5	165	0.180	5	165	0.309	5	165	0.489
10:00 - 11:00	5	165	0.199	5	165	0.283	5	165	0.482
11:00 - 12:00	5	165	0.201	5	165	0.269	5	165	0.470
12:00 - 13:00	5	165	0.224	5	165	0.258	5	165	0.482
13:00 - 14:00	5	165	0.260	5	165	0.230	5	165	0.490
14:00 - 15:00	5	165	0.240	5	165	0.276	5	165	0.516
15:00 - 16:00	5	165	0.531	5	165	0.240	5	165	0.771
16:00 - 17:00	5	165	0.446	5	165	0.268	5	165	0.714
17:00 - 18:00	5	165	0.548	5	165	0.201	5	165	0.749
18:00 - 19:00	5	165	0.420	5	165	0.184	5	165	0.604
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.536			3.661			7.197

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

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

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

MULTI-MODAL CARS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.071	5	165	0.240	5	165	0.311
08:00 - 09:00	5	165	0.109	5	165	0.328	5	165	0.437
09:00 - 10:00	5	165	0.100	5	165	0.150	5	165	0.250
10:00 - 11:00	5	165	0.111	5	165	0.145	5	165	0.256
11:00 - 12:00	5	165	0.103	5	165	0.150	5	165	0.253
12:00 - 13:00	5	165	0.132	5	165	0.140	5	165	0.272
13:00 - 14:00	5	165	0.142	5	165	0.128	5	165	0.270
14:00 - 15:00	5	165	0.134	5	165	0.155	5	165	0.289
15:00 - 16:00	5	165	0.219	5	165	0.132	5	165	0.351
16:00 - 17:00	5	165	0.229	5	165	0.157	5	165	0.386
17:00 - 18:00	5	165	0.305	5	165	0.134	5	165	0.439
18:00 - 19:00	5	165	0.232	5	165	0.115	5	165	0.347
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			1.887			1.974			3.861

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

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

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

MULTI-MODAL LGVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.012	5	165	0.024	5	165	0.036
08:00 - 09:00	5	165	0.024	5	165	0.031	5	165	0.055
09:00 - 10:00	5	165	0.015	5	165	0.012	5	165	0.027
10:00 - 11:00	5	165	0.019	5	165	0.018	5	165	0.037
11:00 - 12:00	5	165	0.018	5	165	0.025	5	165	0.043
12:00 - 13:00	5	165	0.018	5	165	0.015	5	165	0.033
13:00 - 14:00	5	165	0.015	5	165	0.017	5	165	0.032
14:00 - 15:00	5	165	0.010	5	165	0.013	5	165	0.023
15:00 - 16:00	5	165	0.019	5	165	0.007	5	165	0.026
16:00 - 17:00	5	165	0.013	5	165	0.017	5	165	0.030
17:00 - 18:00	5	165	0.015	5	165	0.007	5	165	0.022
18:00 - 19:00	5	165	0.015	5	165	0.015	5	165	0.030
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.193			0.201			0.394

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

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

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

MULTI-MODAL MOTOR CYCLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	5	165	0.000	5	165	0.002	5	165	0.002
08:00 - 09:00	5	165	0.001	5	165	0.007	5	165	0.008
09:00 - 10:00	5	165	0.000	5	165	0.000	5	165	0.000
10:00 - 11:00	5	165	0.000	5	165	0.002	5	165	0.002
11:00 - 12:00	5	165	0.002	5	165	0.000	5	165	0.002
12:00 - 13:00	5	165	0.001	5	165	0.002	5	165	0.003
13:00 - 14:00	5	165	0.000	5	165	0.000	5	165	0.000
14:00 - 15:00	5	165	0.001	5	165	0.000	5	165	0.001
15:00 - 16:00	5	165	0.000	5	165	0.002	5	165	0.002
16:00 - 17:00	5	165	0.002	5	165	0.000	5	165	0.002
17:00 - 18:00	5	165	0.005	5	165	0.000	5	165	0.005
18:00 - 19:00	5	165	0.004	5	165	0.000	5	165	0.004
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.016			0.015			0.031

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

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

Appendix E

WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)
 ONS Crown Copyright Reserved [from Nomis on 26 February 2024]
 Population : All usual residents aged 16 and over in employment the week before the census
 Units : Persons
 Date : 2011
 usual residence : E02004697 : East Hampshire 001 (2011 super output area - middle layer)

place of work : 2011 cen	All categories: Method of travel to work (2001 specification)	Work mainly at or from home	Underground, metro, light rail or tram	Train	Bus, minibus or coach	Taxi	Motorcycle, scooter or moped	Driving a car or van	Passenger in a car or van	Bicycle	On foot	Other method of travel to work
East Hampshire	785	0	0	5	8	1	3	551	38	28	148	3
Waverley	230	0	0	9	10	0	1	194	9	5	2	0
Guildford	117	0	0	4	1	0	1	105	4	1	1	0
Westminster, City of London	107	0	1	99	1	0	0	5	0	1	0	0
Basingstoke and Deane	99	0	0	0	0	0	0	91	8	0	0	0
Rushmoor	98	0	0	3	0	0	0	92	1	1	0	1
Hart	92	0	0	1	0	0	0	84	3	3	1	0
Winchester	52	0	0	0	0	0	0	49	1	1	1	0
Surrey Heath	48	0	0	0	0	0	0	46	2	0	0	0
Havant	24	0	0	0	1	0	1	18	1	1	2	0
Runnymede	20	0	0	0	0	0	0	19	1	0	0	0
Wokingham	18	0	0	0	0	0	0	18	0	0	0	0
Hillingdon	17	0	0	0	0	0	0	17	0	0	0	0
Reading	17	0	0	2	0	0	0	15	0	0	0	0
Camden	15	0	0	14	0	0	0	1	0	0	0	0
Tower Hamlets	14	0	0	13	0	0	1	0	0	0	0	0
Bracknell Forest	13	0	0	0	0	0	0	12	0	1	0	0
Southwark	12	0	1	10	0	0	0	0	0	1	0	0
Portsmouth	12	0	0	0	1	0	0	11	0	0	0	0
Eastleigh	12	0	0	0	1	0	0	11	0	0	0	0
Elmbridge	12	0	0	0	1	0	0	10	1	0	0	0
Hounslow	11	0	0	0	0	0	0	10	0	1	0	0
Southampton	11	0	0	1	0	0	0	10	0	0	0	0
Fareham	11	0	0	0	0	0	0	11	0	0	0	0
Spelthorne	11	0	0	1	0	0	1	8	1	0	0	0
Woking	11	0	0	1	0	0	0	10	0	0	0	0
Hammersmith and Fulham	10	0	0	3	0	0	1	5	0	0	1	0
West Berkshire	10	0	0	0	0	0	0	9	1	0	0	0
Chichester	10	0	0	0	1	0	0	9	0	0	0	0
Windsor and Maidenhead	9	0	0	0	0	0	0	8	0	0	1	0
Mole Valley	9	0	0	0	0	0	0	9	0	0	0	0
Lambeth	7	0	0	7	0	0	0	0	0	0	0	0
Test Valley	7	0	0	0	0	0	1	6	0	0	0	0
Wiltshire	7	0	0	1	0	0	0	6	0	0	0	0
Islington	6	0	1	4	0	0	0	1	0	0	0	0
Kingston upon Thames	5	0	0	0	0	0	0	5	0	0	0	0
Wandsworth	5	0	0	2	0	0	0	3	0	0	0	0
Slough	5	0	0	0	0	0	0	5	0	0	0	0
Kensington and Chelsea	4	0	2	1	0	0	0	1	0	0	0	0
Epsom and Ewell	4	0	0	0	0	0	1	3	0	0	0	0
Reigate and Banstead	4	0	0	0	0	0	0	4	0	0	0	0
Crawley	4	0	0	0	0	0	0	4	0	0	0	0
Ealing	3	0	0	0	0	0	1	2	0	0	0	0
Richmond upon Thames	3	0	0	0	0	0	0	3	0	0	0	0
Leeds	2	0	0	0	0	0	0	1	0	0	1	0
Cambridge	2	0	0	0	0	0	0	2	0	0	0	0
Enfield	2	0	0	0	0	0	0	2	0	0	0	0
Greenwich	2	0	0	2	0	0	0	0	0	0	0	0
Merton	2	0	0	0	0	0	0	2	0	0	0	0
Newham	2	0	0	2	0	0	0	0	0	0	0	0
South Bucks	2	0	0	0	0	0	1	1	0	0	0	0
Wycombe	2	0	0	0	0	0	0	2	0	0	0	0
New Forest	2	0	0	0	0	0	0	2	0	0	0	0
Arun	2	0	0	1	0	0	0	1	0	0	0	0
South Gloucestershire	2	0	0	0	0	0	0	1	0	0	1	0
Oldham	1	0	0	0	0	0	0	1	0	0	0	0
Bradford	1	0	0	0	0	0	0	1	0	0	0	0
Chesterfield	1	0	0	0	0	0	0	1	0	0	0	0
North East Derbyshire	1	0	0	0	0	0	0	0	0	0	0	1
South Northamptonshire	1	0	0	0	0	0	0	1	0	0	0	0
South Staffordshire	1	0	0	0	0	0	0	1	0	0	0	0
Staffordshire Moorlands	1	0	0	0	0	0	0	1	0	0	0	0
Nuneaton and Bedworth	1	0	0	0	0	0	0	1	0	0	0	0
Luton	1	0	0	0	0	0	0	1	0	0	0	0
Thurrock	1	0	0	0	0	0	0	1	0	0	0	0
Huntingdonshire	1	0	0	0	0	0	0	1	0	0	0	0
Dacorum	1	0	0	0	0	0	0	1	0	0	0	0
Hertsmere	1	0	0	1	0	0	0	0	0	0	0	0
Barnet	1	0	0	0	0	0	0	1	0	0	0	0
Hackney	1	0	0	1	0	0	0	0	0	0	0	0
Lewisham	1	0	0	0	0	0	0	1	0	0	0	0
Sutton	1	0	0	0	0	0	0	1	0	0	0	0
Waltham Forest	1	0	0	0	0	0	0	1	0	0	0	0
Medway	1	0	0	0	0	0	0	1	0	0	0	0
Milton Keynes	1	0	0	0	0	0	0	1	0	0	0	0
Wealden	1	0	0	0	0	0	0	1	0	0	0	0
Maidstone	1	0	0	0	0	0	0	1	0	0	0	0
Sevenoaks	1	0	0	1	0	0	0	0	0	0	0	0
Cherwell	1	0	0	0	0	0	0	1	0	0	0	0
South Oxfordshire	1	0	0	0	0	0	0	1	0	0	0	0
Vale of White Horse	1	0	0	0	0	0	0	1	0	0	0	0
Horsham	1	0	0	0	0	0	0	1	0	0	0	0
Bournemouth	1	0	0	0	0	0	0	1	0	0	0	0
Swindon	1	0	0	0	0	0	0	0	0	1	0	0
Exeter	1	0	0	0	0	0	0	0	0	1	0	0
North Dorset	1	0	0	0	0	0	0	0	0	0	1	0
Ceredigion	1	0	0	0	0	0	0	1	0	0	0	0

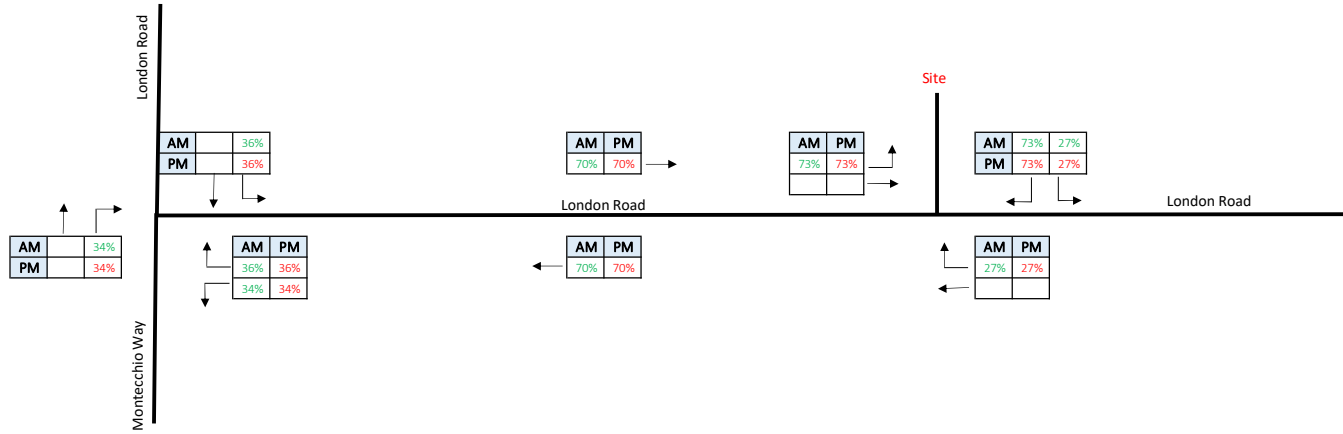
place of work : 2011 census merged local authority district	All categories: Method of travel to work (2001 specification)	Work mainly at or from home	Underground, metro, light rail or tram	Train	Bus, minibus or coach	Taxi	Motorcycle, scooter or moped	Driving a car or van	Passenger in a car or van	Bicycle	On foot	Other method of travel to work
	2035	0%	0%	5	189	25	1	13	1520	71	46	160
					9%	1%	0%	1%	75%	3%	2%	8%

Appendix F



Project Name: Land to the North of London Road, Holybourne
Project Number: 020.0902
Drawn By: CID
Approved By: MDS

Scenario: Percentage Distribution

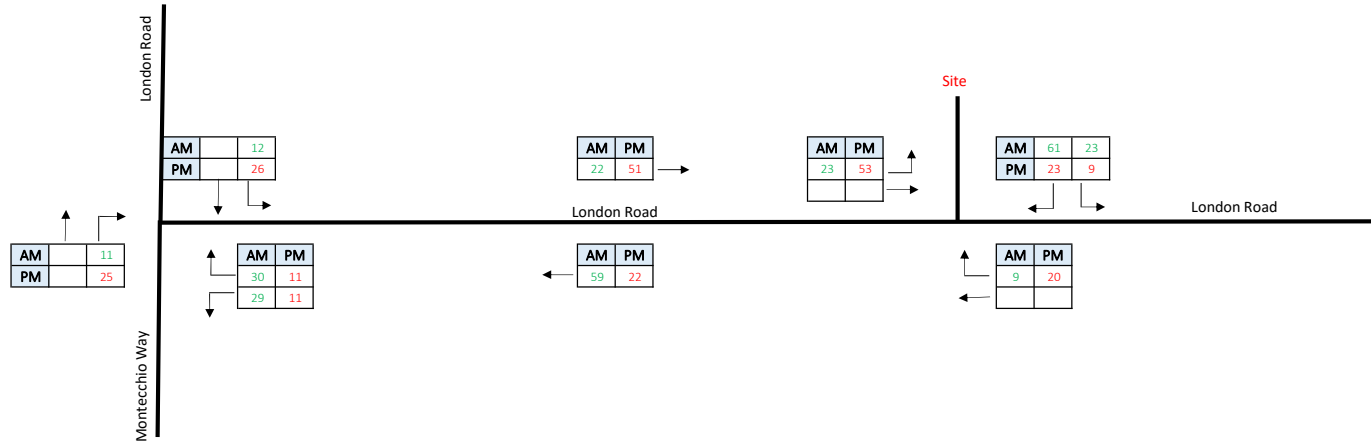




Project Name: Land to the North of London Road, Holybourne
Project Number: 020.0902
Drawn By: CID
Approved By: MDS

Scenario: Trip Generation

	Arr	Dep		Arr	Dep	
AM	0.144	0.377	PM	0.326	0.143	223 units
223	32	84	73	32		





Land to the north of London Road, Holybourne Vision paper

November 2023



CONTENTS

Introduction	3
The site	4
Vision	6
Masterplan	12
Delivery	19
Summary	25

Appendix A: Land at Holybourne,
Historic Environment Desk-Based
Assessment, October 2021

Appendix B: Holybourne Ground
Investigation Review, June 2022

INTRODUCTION

Redbrown Limited has prepared this Vision Statement to promote the allocation of land forming part of the Froyle Estate in Holybourne in the forthcoming East Hampshire District Council (EHDC) draft Local Plan. The site, an approximately 13-hectare area of land to the northeast of Holybourne, is promoted for allocation as a high-quality sustainable extension to the existing settlement to include residential development and other supporting community uses.

This site was acquired in December 2020 when Belport purchased on behalf of Redbrown Limited the agricultural holdings of Froyle Estate, which extends to approximately 1,200 hectares between Alton and Farnham. It is acknowledged that the previous owners of the site made representations at an earlier stage of the draft Local Plan through its promotion partner at that time, Croudace Homes. This promotion was described as 'Land to the north of Holybourne' and was for a larger scale residential development in the order of 1,000 units.

Since acquisition, Redbrown Limited has sought to look afresh at this development opportunity. This Vision Statement sets out a new approach which seeks to adopt a 'landowner legacy' vision for the development comprising high quality design and long-term stewardship, resulting in a smaller proposal more suited to the capacity of the site and the village of Holybourne.

Redbrown Limited has put together an experienced team to help realise its vision for the site. Turnberry Consulting has been appointed as development strategy advisor and ADAM Urbanism appointed as masterplanning architect.

Turnberry is well experienced in the planning and delivery of exemplary new settlements and residential projects including at Chapelton in Aberdeenshire and Tornagrain in Inverness, Arm and Sword Lane in Old Hatfield, and planned new garden settlements for landowners in Kent, North Yorkshire and West Sussex. ADAM Urbanism is a leading practice with expertise in traditional urban planning including at Poundbury in Dorset, Nansledan in Cornwall and traditional urban extensions in Lincolnshire and Oxfordshire.

Noting the presence of the important Scheduled Ancient Monument (SAM) close by, Redbrown Limited has appointed Landgage Heritage, an archaeology and heritage consultancy, to develop an understanding of the heritage assets associated with the site and advise on a strategy to preserve and enhance the SAM and other assets of heritage value in the local area.

Redbrown Limited has also undertaken a groundwater monitoring exercise to establish the likely impact of groundwater on the potential to develop the site. It has commissioned Paddock Geo Engineering to carry out a ground investigation across the site, and appointed Fairhurst to review the results of this investigation. The results of this exercise suggest that groundwater will not be a constraint on the development of the site.

Through a well-designed scheme suited to its wider context with heritage and flood risk constraints carefully addressed, an exemplary new neighbourhood can be built in Holybourne which can be delivered promptly to provide a significant number of houses early in the plan period.

THE SITE

Located to the northeast of Holybourne, on land to the north of London Road and east of Howards Lane, the site is an approximately 13-hectare area comprising several arable fields, with a playground and a sports field in its southernmost part.

The site abuts the north-eastern edge of Holybourne, a village that forms part of the Town of Alton (as outlined in East Hampshire District Council's Settlement Boundary Review, December 2018). To the south of the site are residential properties and recreational fields, with further residential development located along Church Lane to the west. To the north and east of the site are agricultural fields. The wider setting of Holybourne is characterised by residential properties with gardens, and an increase in density in residential properties reaching south towards Alton.

The site is entirely within the ownership of Redbrown Limited, and forms part of a larger contiguous rural estate of approximately 1,200 hectares.

The topography of the site is varied. It contains a small hill at the northern end, with a maximum height above ordnance datum (aOD) of 136m. The topography then falls to 102m aOD at the southern boundary, and 111m aOD at the eastern boundary.

Holybourne is a highly sustainable location for development. There are two mainstream schools in the settlement: Andrew's Endowed School (Primary) and Eggar's School (Secondary). There is also a specialist school, Treloar School. The settlement has two pubs, a shop and regular bus services along London Road.

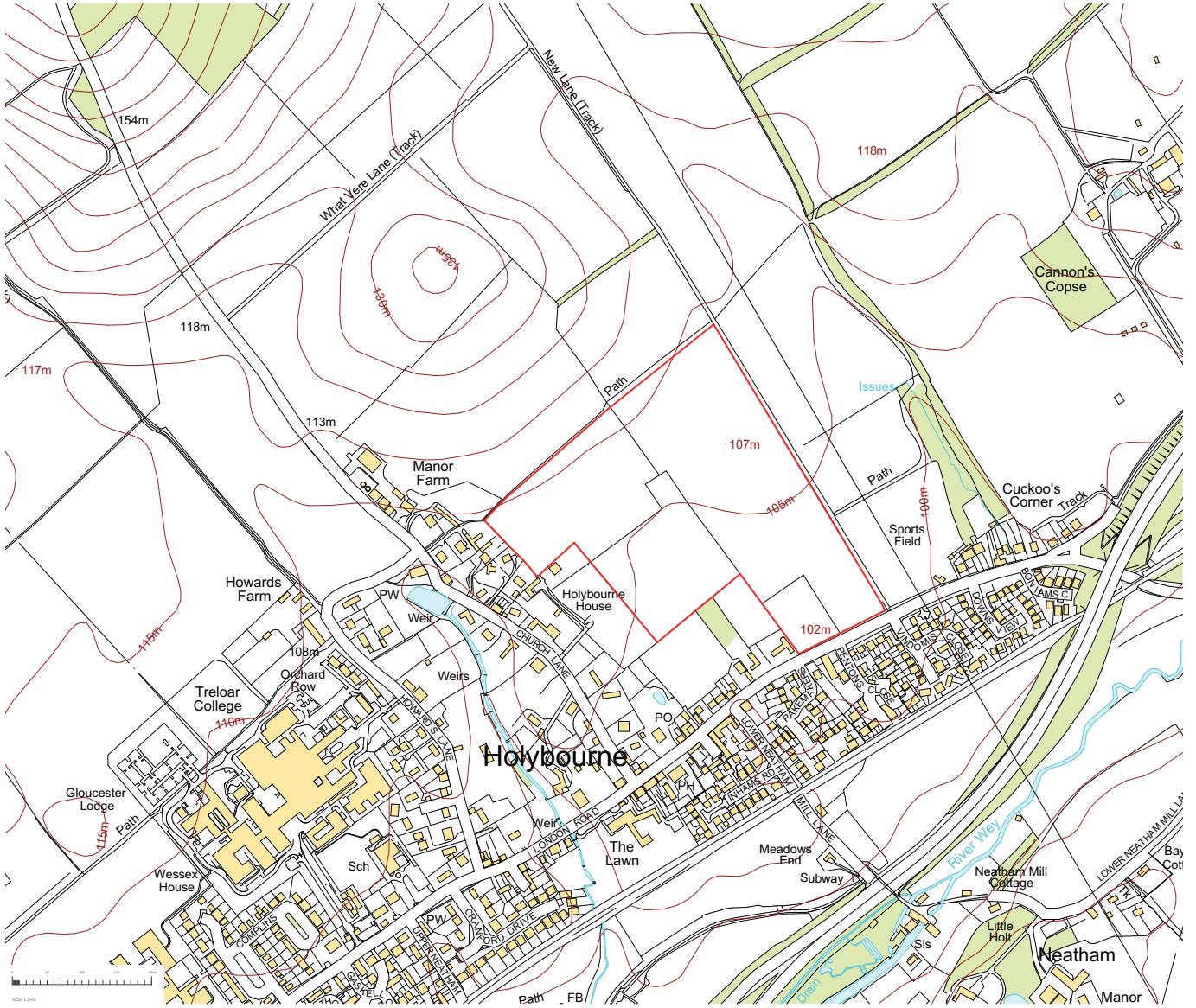
The site is close to the town of Alton. Alton railway station is a 20-minute walk away, offering departures every 30 minutes to London Waterloo Station (the station can also be accessed in seven minutes via the existing 206 bus route from Bonhams Close or five minutes by car). Within Alton town centre (a 30-minute walk, a nine-minute bus journey using the 206 service or a five-minute car journey from the site), there are a number of good services and facilities including schools (primary, secondary and college), GPs, a large business park, gyms, supermarkets, restaurants and shops. The site is also near the A31 which offers strategic transport links to the M3.

Notably, the site is closer to Alton Train Station and town centre than some of the potential sites to the south of the settlement boundary.

The site is located within Flood Zone 1, and as such has a low probability of flooding.

The site abuts the Holybourne Conservation Area in its south west corner and includes an Area of High Archaeological Importance (AHA) to the south east boundary of the site. The site is located in the proximity of a number of designated heritage assets including Cuckoo's Corner, a Scheduled Ancient Monument (SAM) in its south western corner, where the cricket pitch is also located. There are several listed buildings in close proximity to the site.

The community and heritage assets would not be developed and would be preserved and enhanced by a sensitive development which would seek to protect important existing views of the nearby Listed Buildings and the Holybourne Conservation Area. The Scheduled Ancient Monument would not be developed and its setting would also be protected within any form of development.



Holybourne site location plan

VISION

The vision is to create a new neighbourhood built to a high standard that is faithful to traditional urbanism, sustainable in design and construction, and an attractive place to live. The new neighbourhood will be a carefully planned addition to the settlement at Holybourne, providing a full range of house types, sizes and tenures, integrated to achieve a socially inclusive, mixed-income development. In addition to homes, there will be public green space, improved sports facilities, and a new village hall. Cycling and walking will be encouraged with links established to adjacent paths, rights of way and cycle routes, such as St Swithun's Way, a footpath between Winchester and Farnham, to its north.

Redbrown Limited is committed to realising this vision and the masterplan concept for the site details how the proposed plans can be put into practice. Redbrown Limited will oversee the design and delivery of the site to ensure the new neighbourhood meets its aspirations.

Redbrown Limited has been inspired by the resurgence of good settlement planning in the UK whilst being informed by the principles for a 'Garden Community' set out in the Homes England Garden Communities Toolkit, the work of The Prince's Foundation, the Building Better, Building Beautiful Commission and the growing influence these organisations and projects are having on planning policy.



Hume Square, Chapelton



Hume Square, Chapelton



The first phase at Chapelton comprises a range of market and affordable homes inspired by the local vernacular.

The new settlements taking shape at Tornagrain and Chapelton in Scotland demonstrate what can be achieved by a committed landowner and developer, alongside a skilled project team. Urban extensions designed by ADAM Urbanism at Stamford in Lincolnshire and Woodstock in Oxfordshire exemplify the high quality, context-led development planned at Holybourne.

Chapelton demonstrates how a detailed, ambitious vision for high quality development can be realised. This new settlement, which has around 300 homes completed, is presently centred on Hume Square, the first of several 'neighbourhood centres' distributed across the masterplan, which includes a café, shop, green lawn and public art. As the pair of images on the facing page show, the design concept for the new square was completed almost without deviation.

With planning permission for 4,045 new homes, Chapelton will grow into a sizeable new town over a period of decades. The development has been planned in response to the unique conditions of the site and the architectural traditions of Aberdeenshire, and throughout its delivery it will adhere to a set of defining principles which encapsulate traditional urbanism as a whole: it will contain a mix of uses, prioritise pedestrian movements, adopt time-tested urban forms, and will be born of a placemaking process that promotes public participation.



The first phase at Tornagrain, evidencing the urban grain, roofscape, landscape design and materials palette.

At Tornagrain, a new town of 4,960 units being built near Inverness, the first neighbourhood is now complete, comprising around 300 homes, shops, a café, allotments and sports facilities. It has been designed according to the architectural and planning traditions of the local area, resulting in a charming, varied neighbourhood comprising compact, walkable streets. An active stewardship programme has created and sustains a vibrant community amongst the town's first residents, who are invited to contribute to the ongoing running and management of the new settlement.





Arm and Sword Lane, Hatfield.



Other relevant projects include projects like Arm and Sword Lane in Old Hatfield, undertaken by Gascoyne Cecil Estate, which demonstrates how high-quality architecture in keeping with sensitive historic contexts can be economically viable at a smaller scale. Comprising 15 redbrick terraced homes and c.500m² of commercial office space in a Georgian style. Arm and Sword Lane also shows that it is possible to build traditional architecture whilst embracing modern sustainable technology. All houses and business premises within this development are heated and cooled using shared ground source heat pumps.



Cecil Square, using materials and architectural forms representative of Stamford in a new neighbourhood to the south of the town.

Cecil Square, a 45-home development by ADAM Urbanism for the Burghley House Preservation Trust in Stamford, offers a further clear example of the strength of contextual masterplanning informed by traditional urban design principles. Occupying a 1.5-hectare site at the southern edge of Stamford, the architecture and urbanism at Cecil Square has been informed by a detailed Pattern Book, which defines Stamford's character through analysis of local street patterns, the architectural character and detailing of buildings and choice of materials. This strategy will be used at Holybourne, to ensure the new neighbourhood accords with the unique patterns of the existing settlement.



ADAM Urbanism took the same approach at Park View, a 16.7-hectare site to the south-east of Woodstock, bordering the World Heritage Site at Blenheim Palace. The project, which started on site in 2018, is organised by a masterplan which provides for up to 300 new homes, commercial and retail units set around a neighbourhood square, public open spaces, and provides for early education. The development comprises a mix of house types and sizes, which are all designed according to a Design Code which draws on the characteristics of Woodstock and surrounding villages, and sets out the architectural form and the use of materials for the whole site.

Achievements such as those at Tornagrain, Chapelton, Old Hatfield, Stamford and Woodstock require careful preparation and controls to ensure that design standards are not eroded during the planning and construction process. At Holybourne, Redbrown Limited will oversee the project as the master developer, to ensure the consistent delivery of the new neighbourhood in keeping with the guiding principles set out in the masterplan. Using a Design Code to set design standards, the planning, design and construction throughout the project will be continuously monitored to ensure the code is followed. This will also give certainty to the local community and the local planning authority as to the quality, design and form of the new development.

Development at this site will also generate betterment for local residents in Holybourne and Alton. It is proposed to relocate and improve the existing playground facilities within the site boundary, and to build a new village hall that will be available to the local community.



*Top: artist's visualisation of Park View
Middle: artist's visualisation of the neighbourhood square
Bottom: the first phase of Park View as built*

MASTERPLAN

The masterplan will be the guiding document that determines the form and layout of the new neighbourhood at Holybourne. An initial concept plan comprising 223 units has been prepared to illustrate the proposed plans for the development, which sets out at a high level how the structure of the new neighbourhood will be organised with its key elements being: buildings and other built form, a legible and hierarchical street network, open spaces and sensitivity to the surrounding landscape. This is very much a working document and will continue to evolve as the process moves forward.

The plan is informed by an analysis of the site and its context, not least the Scheduled Ancient Monument (SAM) adjacent to the proposed development, and the nearby Holybourne Conservation Area and local listed buildings. The development will be surrounded by a generous green buffer, with new planting to complement existing mature trees and footpaths linking the new neighbourhood to the traditional village centre at the Church of the Holy Rood. Within the site, green space will follow the existing field pattern to provide a central village green, within close walking distance of all homes.

The new homes themselves will be organised around a single primary street which accesses the site from London Road and loops around the development. Secondary and tertiary streets will run from this primary loop, many being shared surfaces to prioritise pedestrians and cyclists.

A new village hall is proposed near the centre of the site, which will be a valued public amenity for new residents and people living in the surrounding area. It will be joined by a new car park, a relocated playground and new playing pitches, in addition to the existing cricket pitch, providing for enhanced facilities over and above what is currently available. It may also be possible to provide some form of enhanced interpretation for the historic significance of the Scheduled Ancient Monument, perhaps as a display of material within the village hall which could be made available for local residents and villagers alike. This could work well alongside information on local walks that could radiate from the new development around the local area.

There is also potential for further local amenities to be situated close to the village hall, such as the possibility of a local convenience store, farm shop or café, which would form part of a local consultation exercise to identify local needs.



Masterplan concept - Land to the north of London Road, Holybourne

Legend

- 1. Green buffer
- 2. Village Green
- 3. Village Hall
- 4. Access from London Road



Above, right and facing page: a selection of images representative of the style and materials characteristic of Holybourne

Character and style

The new neighbourhood at Holybourne will be designed as a sympathetic extension to the village, drawing from local materials, architectural detailing, scale and massing. Holybourne is characterised by buildings built from red brick, with large hipped and gabled red-tiled roofs. Buildings are occasionally painted or rendered white, some with timber frames. The roofscape varies in height and pitch, and frequently features gable dormers, red brick chimney stacks and tall clay pots. Windows are commonly painted, with pairs of narrow plain casements or vertically sliding sashes. Porches, where featured, tend to be narrow and open.

In addition to its architecture, the proposal seeks to embody the urban pattern of the Holybourne Conservation Area. As in Holybourne, there is a single primary street which gives access to narrow lanes fronted by buildings tight set against the kerb. New trees will be planted to enliven the streetscape and frame important buildings and views, such as those to the Norman west tower of Holy Rood Church.







Looking north from London Road

The frontage to London Road will be an important public face for the new development, which will follow the example set by existing buildings on London Road to establish a polite and considered frontage that will complement the character of this route. Buildings will have two storeys, some with dormer windows, porches and large rectangular windows. Roofs will vary in pitch and height and will be punctuated by chimneys. Shallow front gardens will feature gates, hedges and shrubs, in the character of the existing houses in Holybourne. The primary road into the new neighbourhood will recede invitingly, curving gently into the site.



Looking west over the Village Green

The village green will be an intimate focus for the new neighbourhood, framed by a variety of housing frontages and gable ends, finished in red brick and white render. A central and tranquil green and pedestrian-focused area retaining some of the existing trees, the village green will be aligned with long distance views within the scheme.



Looking west from St Swithun's Way, from the northern edge of the development

The edge of the new neighbourhood has been planned to create a sympathetic relationship between the development and surrounding context: Holybourne and nearby arable fields. The green buffer at the settlement edge will be accessible as an informal amenity green space, with new and existing trees planted throughout to add variety and help to integrate the development within the surrounding landscape. Existing public footpaths including St Swithun's Way will be preserved in a wide green corridor and will benefit from connections to the new neighbourhood which will improve access to this popular right of way.

DELIVERY

The new neighbourhood at Holybourne will be delivered through a landowner-led delivery model, under the leadership of Redbrown Limited and completed by an experienced project team. Redbrown Limited is committed to managing the delivery of the project throughout its duration, to ensure that the completed development stays true to its vision and masterplan for the site. Redbrown Limited will be the master developer for the site, with control over the delivery of enabling infrastructure, the detailed design for the scheme, the appointment of housebuilders and setting in place long-term measures for the management of the site over the long term.

Conscious of the history of site promotion in this area, Redbrown Limited has reassessed the capacity of this 13-hectare site to establish what can sustainably be delivered. In doing so, it has sought to address the particular concerns highlighted by EHDC in its Sustainability Appraisal and other associated work – heritage and archaeology, and potential risk from groundwater flooding – alongside consideration of biodiversity, environmental stewardship and planning policy.

Heritage and archaeology

There exist sensitivities with respect to the Scheduled Ancient Monument adjacent to the proposed development and the nearby Holybourne Conservation Area. An Historic Environment Desk-Based Assessment has been undertaken by Landgage Heritage to establish the heritage context of the site, the possible impact of development on heritage assets, and potential for mitigation of any such impacts. The product of this work is summarised below and available in full at Appendix A.

For the avoidance of doubt, the proposed development would not include the area of the Scheduled Ancient Monument at Cuckoo's Corner. Whilst it is understood that the development site has known potential to contain buried remains associated with the scheduled Roman settlement in its southeast corner, the assessment has found that any archaeological remains likely to be present in the development site outwith the boundary of the Scheduled Ancient Monument are likely to be of no more than local interest.

Any impact on archaeological remains of local interest that may be found can be adequately mitigated by a programme of archaeological works. This would comprise an initial phase of archaeological evaluation, to confirm the nature and extent of the remains, followed by archaeological excavation and recording of any remains of interest. This would realise the research potential of the buried remains and would provide information on the past use of the study site. This work would also further the understanding of the context of the scheduled Roman settlement in the south-eastern corner of the study site. As such these works would provide a small public benefit that would otherwise not be realised.

This benefit is considered sufficient to compensate for the potential loss of archaeological remains of local interest, and would be an appropriate response for the anticipated prehistoric, medieval, Post-Medieval and peripheral Roman remains within the study site. Once this mitigation response is agreed, the development of the study site could be implemented without resulting in an unacceptable loss of archaeological interest.

The setting of the designated heritage assets in the surrounding area and their relationship to the study site have also been carefully considered. The assessment has found that the study site forms part of the setting of Holy Rood Church, Manor Farmhouse, Oak Cottage, the lychgate at Holy Rood Church and Howard's Farmhouse and nearby Barn, as well as of the Holybourne Conservation Area

Depending on the scale of the development proposed within the study site, the proposed development has the potential to change the setting of these assets, and could harm their significance. However, the assessment has found that the likely effects would not result in substantial harm to the significance of the assets concerned, as in all instances their core architectural, historic, and archaeological interest would be unaffected.

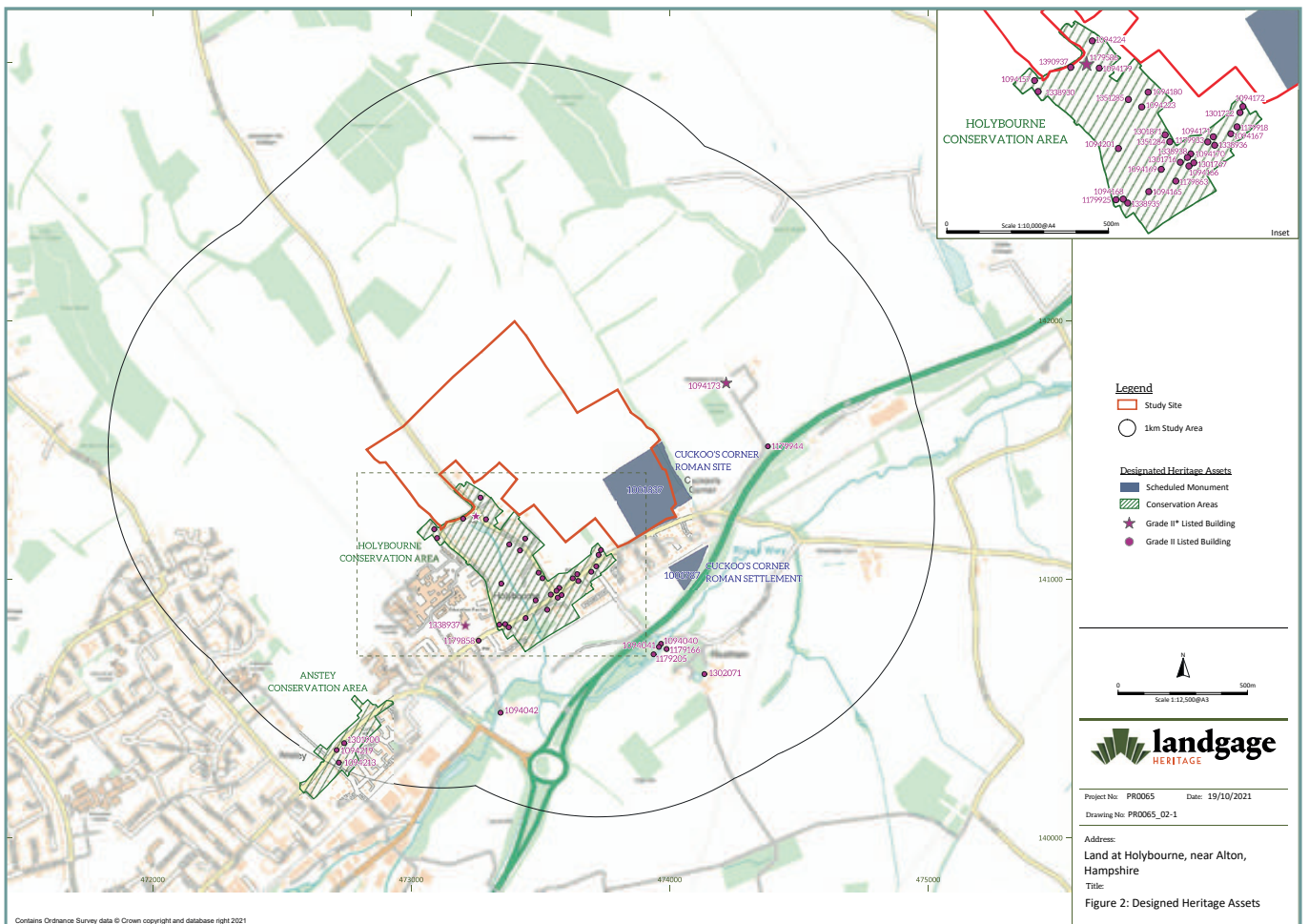
The historic environment assessment also found that any less than substantial harm which may result from the proposed development could be reduced by implementing the following measures:

- Retaining hedgerows that are aligned with the Roman road system, to retain the legibility of their influence in the landscape.
- Avoiding development in the westernmost field of the study site, which would preserve the immediate setting of the church, and that of Howard's Farmhouse and the nearby listed barn.

- Using open space to avoid development on the more exposed areas in the northern fields of the study site. This would avoid competition for prominence with the church, and could also protect the rural setting of Manor Farmhouse.
- Framed views of the church spire should be incorporated into the design of the development to protect the prominence of the spire.
- Care should be taken along the western edge of any development in the southern part of the study site, to ensure that rural character to the edge of the conservation area is retained.

These measures would also reduce the potential impacts to the setting of the Holybourne Conservation Area. With the benefit of these measures, the setting of Manor Farmhouse, Howard's Farmhouse and the nearby listed barn would be preserved, as would the significance of the church. Any effects to the Holybourne Conservation Area would be reduced, and could be avoided with careful design.

On this basis it is clear that the study site could be developed without resulting in unacceptable effects on the historic environment. It would therefore accord with the requirements set out in the NPPF, policies in the adopted East Hampshire District Council Local Plan: Joint Core Strategy, as well as the policies in the emerging East Hampshire Local Plan to 2036.



Above: The site in the context of designated heritage assets, including the Scheduled Ancient Monument, Holybourne Conservation Area, and nearby Listed Buildings.

Left: Looking north east over the Scheduled Ancient Monument site.

Groundwater flood risk

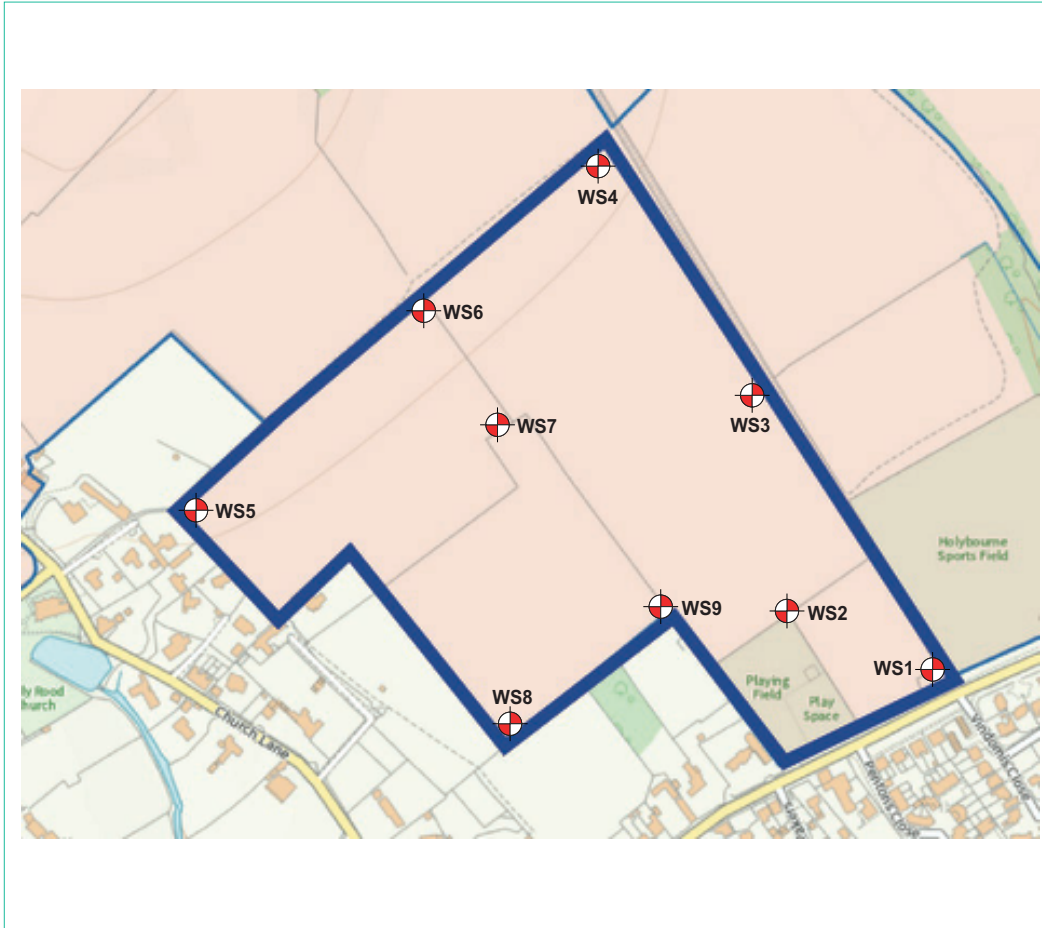
The site lies within an area identified by East Hampshire District Council as having 'potential for groundwater flooding to occur at the surface', according to the BGS Susceptibility to Groundwater Flooding drawing included in the Council's Level 1 Strategic Flood Risk Assessment published in October 2018. In order to develop a clearer understanding of groundwater flooding risk, Redbrown Limited commissioned Paddock Geo Engineering to carry out a ground investigation through a series of monitoring wells, in order for groundwater monitoring to be carried out over a six-month period between December 2021 and May 2022. The assessment was designed to monitor groundwater depths over a worst-case six-month winter period. Following the completion of this work, Redbrown Limited appointed Fairhurst to review the outcome of the ground investigation. The result of this work is enclosed at Appendix B.

The findings of the investigation, as summarised by Fairhurst, are set out below:

- The ground investigation comprises 9 exploratory holes that have been formed to depths of between 2.7 and 4.7m below ground level. All of the exploratory holes were installed with groundwater monitoring standpipes.
 - The ground conditions vary. The upper elevations (WS4, 5, 6 and 7) all have weathered chalk directly below topsoil and the lower elevations (WS 1, 2, 3, 8 and 9) have varying thickness of head deposits below the topsoil overlying weathered chalk at depth.
 - The head deposits comprise CLAY overlying GRAVEL.
 - The chalk varies from a structureless matrix supported chalk (DM) which describes as a SILT, to structureless clast supported chalk (DC) which describes as a GRAVEL.
- The CLAY Head deposits and weathered chalk SILT will have low permeability and tend to act as an aquiclude / aquitard (prevent / limit movement or ingress of water) and the GRAVEL Head deposits and weathered chalk GRAVEL will have much higher permeability and tend to act as aquifers.
 - All but one (WS 7) of the groundwater monitoring installations within the boreholes that had no Head deposits were dry throughout the monitoring period.
 - All the boreholes with Head deposits encountered groundwater.

Fairhurst concluded that the findings of the ground investigation suggest that the groundwater that was encountered is not a true groundwater table and may be perched water within the more permeable GRAVEL Head and chalk deposits. As such, it will not present a major constraint on the development of the site. If the groundwater encountered in the boreholes were a true water table and this were being fed by the high ground catchment to the north and north west there would be the strong potential for artesian or sub-artesian conditions within the boreholes. This has not been observed with only modest, if any, rise in groundwater level when encountered during drilling.

The elevation of the groundwater is such that it is likely to be encountered in drainage and potentially foundation excavations during the construction of any future development on the site (dependent upon final design levels). Assuming that the groundwater is perched, as is considered likely, this impact will be limited and relatively easy to manage and will only impact on the lower elevation parts of the site. Fairhurst concluded that, even if the encountered groundwater were true groundwater, the constraint associated with this can be overcome by appropriate design and suitable construction methods. Redbrown Limited is therefore satisfied that groundwater will not prevent the development of this site as proposed.




PADDOCK
GEO ENGINEERING

**Exploratory Position
Site Plan**

Land adjoining London Road,
Holybourne,
Hampshire,
GU34 4HA.

Belport Limited
December 2021

 Window Sampling
Locations with
monitoring installations

Not to scale.
All positions are approximate.
Based on plan provided
by the client.

Above: Exploratory position site plan detailing the location of window sampling carried out on site.

Biodiversity and environmental stewardship

Redbrown Limited operates with sustainability at the heart of all decisions and practices. At Holybourne it will undertake the necessary surveys and assessments to establish the ecological baseline for the site, which will inform a strategy to deliver at least 10% biodiversity net gain, to meet the requirements set in the Environment Act (2021), the existing and emerging Local Plans for East Hampshire, and other relevant local and national policy.

Redbrown Limited is well placed to deliver these benefits. The site at Holybourne is part of the larger Froyle Estate operated by Redbrown Limited which covers approximately 1,200 hectares between Alton and Farnham. The scale of this landholding brings opportunities for biodiversity net gain and ecological enhancement beyond the site boundaries, with potential for alignment with Redbrown Limited's existing countryside stewardship projects. Encompassing improvements to soil health, hedgerow management, woodland creation, and biodiversity enhancements, this work represents Redbrown Limited's commitment to environmental stewardship and its ongoing contribution towards the UK Government's landscape recovery agenda.

Planning policy

This new neighbourhood at Holybourne is promoted in the context of the emerging Local Plan for East Hampshire, the terms of which have been changed significantly since the Regulation 18 Draft Local Plan was published for consultation in February 2019. That draft, which covered the period 2017-2036, set out a minimum housing need for East Hampshire (outside the National Park) of 10,456 dwellings to be delivered between 2017 and 2036.

However, following changes to national planning policy the District Council took the decision to prepare a new hybrid Local Plan, which included the extension

of the plan period by two years to 2038. This was to ensure the plan period would extend to a period of at least 15 years from the date of adoption.

The Council's revised approach required additional site allocations to be added to the spatial strategy for the District, to ensure adequate housing supply until 2038. It also required the development and testing of an alternative spatial strategy to accommodate the delivery of significantly more housing than previously identified. This requirement is set by the NPPF, to ensure the emerging Local Plan has the flexibility to meet potential increases in housing need at short notice.

Several options were developed and presented to EHDC's Planning Policy Committee in July 2021 in a report which identified a preferred spatial strategy that would result in the delivery of approximately 3,800 additional new homes to 2038. This would provide the flexibility required by the NPPF and is known as 'Option 2'.

The additional housing set out under Option 2 is predominantly delivered through a selection of 'core sites' that featured in the Draft Local Plan (February 2019) and are still considered suitable, available and achievable in terms of development, as well as a handful of other sites that were previously shared with members of Local Plan Working Group as part of early engagement workshops. In addition, Option 2 includes approximately 819 further dwellings associated with on-going regeneration at the Bordon Garrison and Louisburg sites in Whitehill & Bordon; as well as approximately 1,200 dwellings at an urban extension at Chawton Park Farm, Alton.

On 23 September 2021, EHDC's Full Council was invited to approve 'Option 2' as the spatial strategy to feature in the emerging Local Plan. Instead, the Council opted to 'approve the different spatial options for the EHDC Local Plan 2017-2038 for further consideration'. More work is evidently required before a spatial strategy is

adopted, and it is in this context that Redbrown Limited is promoting the site at Holybourne for allocation. This proposal would see the delivery of 223 residential units, which would make a significant contribution to the local area's housing need. Development at the site would not have a detrimental impact on the landscape and has been judged as having a limited contribution to the setting of a number of heritage assets including the SAM at Cuckoo's Corner. The site is in a sustainable location and well-connected to local and regional transport infrastructure and is suitable for development with respect to the existing settlements at Holybourne and Alton.

The Alton Neighbourhood Plan is currently being reviewed, with engagement on growth of the Alton area being the central focus. As part of this process, the Site is being assessed as an opportunity for residential growth within Holybourne.

Stakeholder consultation

During the planning process, a rigorous consultation process will be undertaken with the local community and other stakeholders to understand their priorities and concerns with respect to the proposed development. Redbrown Limited is a responsible developer and will meaningfully involve stakeholders as detail is added to the proposal for the site.

Design coding and architectural control

Redbrown Limited will develop a Design Code which will be used to ensure that every part of the proposed development is built to the required quality and consistency. Containing detailed information on scale and massing of development, design and materials, the Design Code will ensure that the new neighbourhood corresponds to the vision set out by Redbrown Limited. The Design Code will also give certainty to EHDC and the local community over the nature of the development. Providing a clear set of

design requirements that all housebuilders must adhere to, the design codes will control both how the new neighbourhood is built, and how any future alterations must be designed.

The Design Code will set out rules with respect to:

- The mix of house types and densities within the development;
- The design of the village green, the green buffer and other landscape assets including trees, verges and SUDs.
- A local architectural vernacular including:
 - Typical street design;
 - Treatment of public spaces;
 - Typical building design including boundary treatments, façade design, rooflines, street furniture, parking and planting;
 - Treatment of key views and non-residential buildings; and
 - A palette of materials drawn from the local area.

Quality control

Redbrown Limited will work with quality housebuilders to realise its vision for Holybourne. It is not proposing to work with national volume housebuilders unamenable to the landowner legacy model, and will only release land to those who are prepared to meet the detailed design requirements that will be set out for the site.

Redbrown Limited will structure the release of land to housebuilders such that it retains control over the quality of development. It will do this through the land transfer process and obligations to adhere to the relevant design codes. In the first instance, land will not be released unless Redbrown Limited is confident that housebuilders can achieve the standards and quality as set out in the design coding documentation. In the second, its Land Sale Strategy sets in place mechanisms that prevent housebuilders

from deviating from the overarching vision for the new neighbourhood. Redbrown Limited will seek to appoint suitably qualified and skilled housebuilders which are local to the project and small or medium-sized, rather than national housebuilders.

On the basis that the land will have the benefit of planning permission, serviced residential parcels will be brought forward for sale by one of the following routes:

1. Parcels are sold subject to reserved matters approval (Preferred approach as it requires housebuilders to submit design proposals alongside their financial offer).
2. Parcels are sold accompanied with reserved matters approval (Reserved matters applications will need to adhere to the Design Code and will not proceed unless approved by Redbrown Limited).
3. Parcels are sold with build licences or building leases, with land ownership not changing until the unit is completed (Compliance with the Design Codes would form part of the licences).

At the start of the procurement process, and before housebuilders are appointed, they will be given a suite of documents that sets out the approach to developing the site. The housebuilders would be obliged to adhere to any conditions set out therein. This suite will include:

- Development briefs prepared by Redbrown Limited
- A Design Code
- Marketing and Branding stipulations
- Affordable housing neighbourhood requirements

The development of non-residential components, such as the village green, will be subject to the same quality-control mechanisms.

SUMMARY

This proposal for a new neighbourhood on land to the north of London Road in Holybourne represents a revised approach to the proposed development on this site which is both deliverable and sustainable. Redbrown Limited is committed to creating a high quality, landowner-led development on this site and is driven by a vision for placemaking informed by the very best of contemporary and traditional urban planning practice.

Redbrown Limited is ambitious in its aspirations for quality and longevity, and believes the concept masterplan proposed in this document is a robust and measured development which will reflect existing local patterns of development and architectural design, respect and preserve the heritage and archaeology assets close to the site, and result in a contemporary settlement that embodies the character, existing style, details and materials found in Holybourne.

Redbrown Limited has put in place an experienced team to design and deliver a new neighbourhood in Holybourne which will meet its vision for a 'landowner-legacy' project comprising high quality design and long-term stewardship. Redbrown Limited is confident that the vision for the site can be realised. It will continue to develop its plans for the site and looks forward to discussing the proposals further with East Hampshire District Council.



REDBROWN

Ref:
Date: February 2024



Vail Williams LLP
Lakeside North Harbour
Western Road
Portsmouth
PO6 3EN

Sent via email to: localplan@easthants.gov.uk

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

vailwilliams.com

Dear Sir/Madam

Re: East Hampshire District Council's Local Plan 2021 - 2024 Regulation 18 (Part 2) Consultation Site LIP1 (Formerly SHLAA Site Reference LIP034 and Land Availability Assessment Site LIP/005)

Vail Williams LLP has been instructed to submit representations on behalf of Elberry Properties Ltd in relation to the East Hampshire District Council's Regulation 18, Part 2 Consultation.

Elberry Properties Ltd is the promoter and the proposed housebuilder for the site which has been previously subject to SHLAA site reference LIP034 which is also known in the Land Availability Assessment as LIP/005. As part of the draft Local Plan the site is allocated as a housing site with reference LIP1. The site is located on land north of Haslemere Road, Liphook, GU30 7BX.

Since the representations submitted under the Regulation 18 (Part 1) consultation, Elberry Properties Ltd and their consultant team have corresponded with and attended meetings with the Bramshott & Liphook Neighbourhood Development Plan Steering Group. During the course of 2023 the Neighbourhood Development Plan Steering Group voted in favour of progressing their neighbourhood plan policies without site allocations. This decision was made through discussion and votes and the neighbourhood plan steering group will be coming back with sites in due course but no dates have been set.

In the summer of 2023, Elberry Properties Ltd and their architects, heritage consultants and planning consultants, have undertaken a pre-application with the East Hampshire District Council's Development Management team. As part of this process the layout and design of the site has been considered from a conservation, design and landscape-led approach. Due consideration has been given to the site's constraints and the site's context. The consultation responses and the planning officer's response, to the pre-application, have been received and the details of which are subject to review and consideration by the applicant.

Since the Regulation 18 Part 1 representations were made the layout and design of the site has evolved. Please see below the current site layout (also attached separately).

LISTEN

CARE



INNOVATE

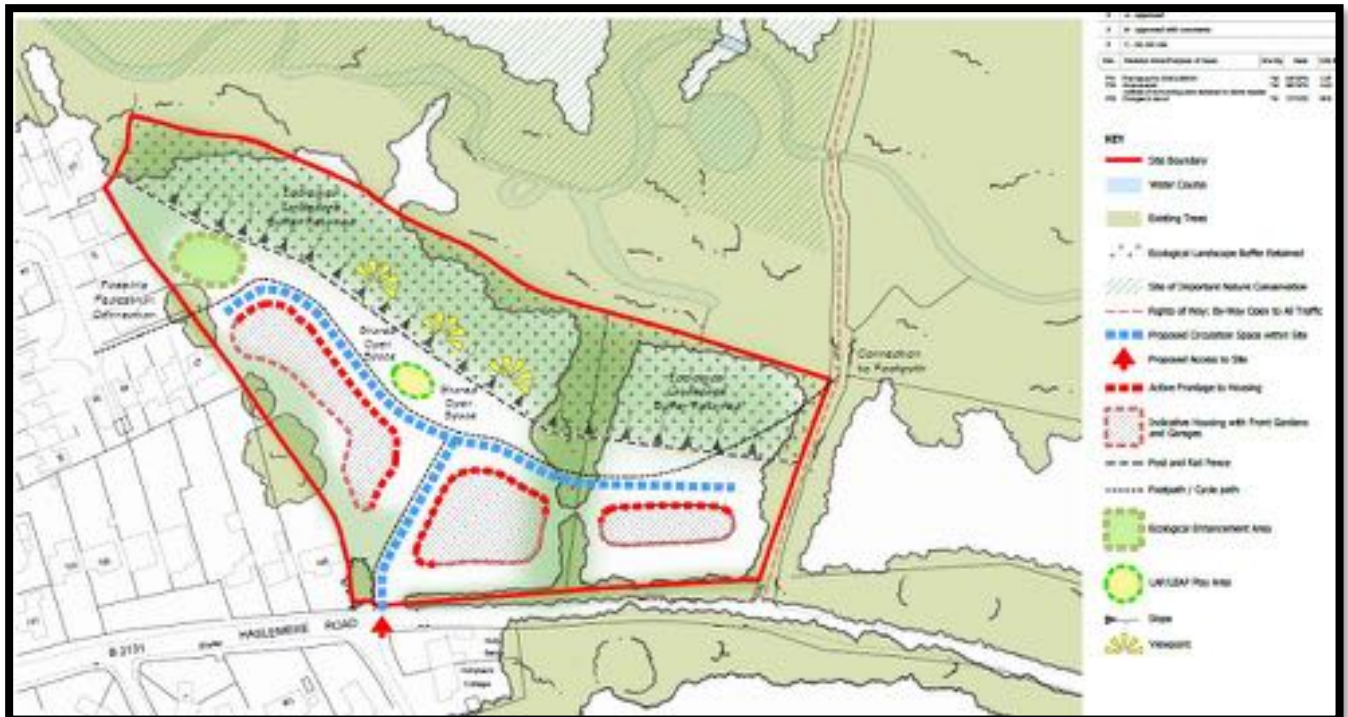
LEAD



The above indicative layout has been subject to the pre-application and responses. There are new pre-application enquiries being made, with specialist input from conservation, design and layout officers. The specialist pre-application meetings following on from the initial development management pre-application, will be arranged to take place in the months of March and April 2024.

The layout above is further to surveys undertaken by the professional team regarding the site's context, the site's constraints and the opportunities to provide appropriate scale and massing for residential development, on parts of the site with the least impact with a significant area of the site excluded for ecological enhancement.

The insert below is an earlier concept design which formed the basis for the proposed development in the shape and form, presented above.



Pedestrian and Cyclist Movement

LIP1 establishes a great opportunity to address one of the major issues in the area, which is the fact that the pavement terminates at 145 Haslemere Road. There is a narrow highway verge on the southern boundary of the site. The verge has a desire line along it where pedestrians have previously walked for many years. The proposed development of the site includes public access through and along the movement space. It will be proposed as part of any planning application and the continued promotion of the site, that this route will be available for members of the public to walk and cycle through the site to the byway on the east boundary.

Not only will this benefit the existing residents to the east, providing safe passage through the site and onto the pavement alongside Haslemere Road; it will also provide the existing residents to the west of the site with an opportunity to access the countryside without a requirement to drive to a safe place to start their walk.

Landscape Considerations

Another great benefit of the promotion of this site is that the landscape is considered to be of value. It is for this reason that the proposed plans as illustrated in the indicative layout above and the indicative site layout plan and design is to embrace and face the landscape. This is in contrast with housing located to the northwest of the site outside of the boundary, where the private gardens back onto the conservation area, with the associated woodlands and water course. Essentially in these instances the landscape and areas of significant value, are only accessible and visual to private individuals.

The proposed development will in fact create a frontage overlooking the landscape and areas separated for ecology and biodiversity. With the shared public movement space, open space set away from the area for protection, landscape, ecology and countryside. With the public separated from the area for enhancement by a means of enclosure. This is beneficial for two main groups of reasons.

The first is that there will be no private interest which will damage or harm the areas for protection insofar as there will be no dwellings which back onto this land, there will be no future land grabbing and the land can be effectively managed and remain protected and of a public interest as a natural asset.

The second group of reasons is associated with the fact that this land is currently private, it is grazed, it is paddock, it doesn't have any public view. Given that the site is considered part of the conservation area the proposals will in fact enable the public to enjoy a view, the space and countryside supported by the fact that there will be a clear route across the site which will be separated from the areas for protection of biodiversity, ecology and landscape value. This new public route would enable views which are not otherwise realised.

Flood Risk

The topography of the site means that no part of the proposed areas for development or open space are in or near Flood Zone 2 or 3. The areas of the site for public access, use, for building, for movement, or open space for play, are entirely in Flood Zone 1.

Green Infrastructure

The proposed development will retain the existing hedgerows. Furthermore, the proposed development will seek to enhance the area of the site along the north which is not limited to the boundary area; it includes a significant part of the site which will include the slope down to the blue and green corridors and up to the point where the land begins to level out. At the point where the land begins to level out there will be a break before any built form whereby there will be open space following which there will be areas for movement.

The developed and private areas of the site will then follow. The private areas of built form and rear gardens will in fact be adjacent to either the existing residence to the west, or Haslemere Road on the south. This is a considered and sensitive approach in order to ensure that any ecology, landscape, biodiversity considerations are placed at the heart of the proposals.

Access

As indicated in the draft allocation the vehicular access is as per the layout plan and that is proposed in the southwest corner of the site over the existing access which will be improved as part of any development in order to meet highway standards.

The applicant's transport consultant is due to undertake formal pre-application discussions with Hampshire County Council regarding the scope of works and surveys which will be required to support a formal planning application. The proposals will include parking for vehicles and cycle spaces in accordance with Hampshire County Council's guidelines.

Design Approach

The design will respond well to the local vernacular and surrounding natural landscape and should involve using environmentally sustainable methods of construction. Given the likely development of building standards over the coming decade to meet the climate challenge, Elberry are seeking to at least achieve current standards with a view to future proof the development.

Elberry are keen to explore whether this development can achieve a low carbon impact. We have begun an in depth review of the specific measures that will be incorporated and how these influence the design proposals. The new homes will emerge from its close association to the natural environment integrated with the surrounding community and seeking to enhance biodiversity, where possible. Whole site assessment against low carbon standards, enabling a reduction in both carbon during construction and also in use. Orientation optimised where possible to assist with low energy design of homes. Based on a fabric first approach. Use of low carbon heating such as air source heat pumps, combined with on-site energy generation.

The proposals will encourage use of bicycles, including dedicated or shared routes through the site with clear connections to nearby routes. Encouraging accessibility for pedestrians, including with a footpath connection to the wider footpath connection, avoiding unsafe travel along verges.

River Wey Conservation Area

Due to the topography of the site with built form in an elevated position behind the ecological enhanced area, separated from public open space and areas of movement will mean that no part of the proposals will be in any “water meadow system”. In fact, that there are no aqueducts near the site; it is considered that the Conservation Area boundary, plotted in 1983 was done so in an illogical manner.

It is considered that the site may have been unintentionally included as part of the Conservation Area based on plotting from aerial images without consideration of the location of the aqueducts or topography of the area with respect to the formation of water meadows. The nearest known aqueduct is located to the west of London Road and Radford Park. There are no aqueducts to the east of the site (at all) and the next nearest aqueduct (after Radford Bridge) is located to the west of Bramshott over a mile away.

The last known aqueduct is understood to be located to the north of Headley. The site is elevated above Liphook and has a steep slope which is out of the floodplain. Due to the distance from the aqueducts and the site’s elevated position the site has no historic connection to the features of the River Wey.

As such it is considered that the site whilst in part included (by error or otherwise) within a Conservation Area has no impact or bearing on historic purposes of identifying the conservation area in the first place. As such, the proposed development of the site would not conflict with the purposes of adopting the conservation area. Furthermore, it is also considered that the proposed layout with large buffer to the SINC is actually a suitable proposal under the designation in any event.

Brief discussions with the LPAs conservation and heritage team have taken place. At this current time Elberry Properties has an advanced understanding of the historic landscape and in any event the proposals are being worked on from a conservation, landscape and design led approach, with due consideration for all constraints. A pre-application with the Conservation and design team is due to take place with a view to progressing the design in a sensitive manner and in respect of the designation as a conservation area.

The River Way Trust comments appear to be suggesting that the whole site is going to be built on. This may be based on the public consultation, including the entire site envelope, without setting out the proposed layout plans. As such it appears to be based on worst case scenario and is without the benefit of the knowledge of the work which Elberry Properties team have undertaken and are continuing to work towards. The physical impacts on the river and its immediate environs which they describe will not occur as the built element of the proposal will be set back. The proposals also seek to protect the natural elements which incidentally are not part of the purpose of any conservation area designation.

Affordable Housing

As part of the development management pre-application consultation response have been received in regard to housing needs. At the time of any planning application (to follow), consideration will be given to the most up-to-date housing needs survey. The proposals are to include both market and affordable housing and the provision will be for one, two, three and four bed dwellings to reflect housing needs. The type and tenure of the affordable housing will also be reflective of the needs.

CIL

The proposed development for the site will also include Community Infrastructure Levy contributions to reflect the proposed development.

Health

It is understood that proposals for the site will include Section 106 contributions towards the Liphook Village Surgery. The calculations of which are understood as they are public on other applications in the area.

Traffic in the centre of Liphook

It is understood that there is concern for traffic in the centre of Liphook and that proposals in the area will likely include CIL contributions which will be dedicated to improvements within the centre of Liphook for cycle and pedestrian movement. It is considered that the housing on this site will not only provide pedestrian and cycle connections to the site's edge and the existing pavements and highway of Haslemere Road it will also enable residents outside of the site who reside to the east and northeast of the site a new route in which to reach Liphook by foot or by cycle safely.

Wellbeing and Balance with Nature

It is considered the proposed development for reasons set out above in regards to the public access through and onto the site and to the public area will provide a visually attractive and welcoming environment for existing members of Liphook and the proposed residents a new vista. As well as a new safe and attractive route to and from the countryside and Liphook.

It is considered that the proposals with the orientation of the built form and the protection of the natural and ecological environments will complete this edge of Liphook. The existing townscape to countryside environment is one of private rear gardens and housing, meets private paddock, meets countryside.

The proposals will create a well planned and rounded approach, to creating the edge of Liphook for the benefit of the current and future generations of the area. The environment which will be created will be one which is safe and community orientated with passive surveillance and a feel of shared ownership and environment.

Taking account of public views of wanting to protect the rural areas in and around Liphook. The proposed development should be embraced as an example of a way in which a balance can be struck between meeting everyone's objectives. The way in which the site will be orientated will mean that the landscape, countryside and areas of protection will be safeguarded. The access to view the separated areas without entering (with the benefit of a boundary treatment (post and wire fencing) will provide an enhanced amenity value as well as enhanced ecological value to the people of Liphook and the natural environment. Bringing benefit in terms of the quiet enjoyment of the area and the tranquillity of this site. Currently the closest a member of public can be, to this view (proposed to become publicly viewable), is Haslemere Road.

The topography of the site will make this unique and cherished place for a new community and lifestyle which combines nature and the community. Soft boundaries will be retained with native species to soften garden boundaries and the public realm, complementing the native mix of species already in the area. The provision of the open space and play space will encourage enjoyment and interaction at all levels, through natural play and integrating with more natural features of the area boosting an overall appreciation and wellbeing between residents and the natural environment.

Conclusions

LIP1 is considered in light of the Regulation 18 Part 2 consultation to accord with the LPAs Vision, Issues and Priorities. It is sustainably located. The proposed layout and design will meet the aims and objectives of the Local Plan. It is also considered that the development of this site, in the manner in which it is being designed, brings multiple benefits, for the public with regard to views and connectivity, natural environment in terms of the layout, orientation of the site, areas of enhancement, and vegetation to be retained. As well as providing market and affordable housing with housing needs requirements determining the type and mix.

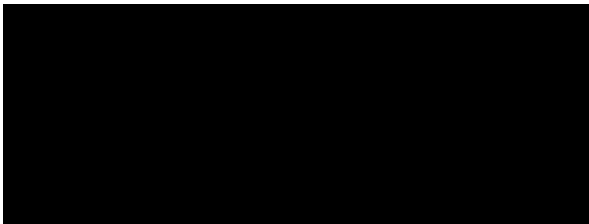
We would ask therefore that the site continues to be supported by the local planning authority through the Local Plan Process. The site can also continue to be identified as: Developable; Available; Achievable and Deliverable in the next 5 years.

Representations were made regarding the proposed local plan policies, in January 2023 and other than the strategic policy comments below; earlier comments development management policies are not repeated here. The main purpose of these representations is to update EHDC Planning Policy team with regard to the site allocation LIP1. Regarding meeting the aims and objectives of the strategic needs and the details with respect to the vision. It is therefore acknowledged that Policy S1 [Spatial Strategy] of the plan period (2021-2040), the Local Plan will make provision for the delivery of at least 9,082 new homes, equivalent to 478 homes per annum. As well as Policy S2 [Settlement Hierarchy] regarding the 5 Tier Hierarchy of settlements whereby Liphook is identified as Tier 2 alongside two other settlements with only a single settlement identified as Tier 1 ahead of the remaining settlements.

We are grateful for the opportunity to comment on the Council's 2040, Local Plan Regulation 18 – Part 2 with respect of Site Allocation LIP1. Please ensure that we are kept fully informed of all progress on the Local Plan and any future opportunities to engage in the process.

If the Council requires any additional information, please do not hesitate to contact us. In the meantime, we look forward to receiving confirmation that the representations are duly made.

Yours faithfully,



Notes
 1. This drawing is the copyright of MH Architects Ltd
 2. Do not scale this drawing except for Local Authority planning purposes
 3. All dimensions must be checked on site by the contractor prior to commencement of the works.



Client Approval

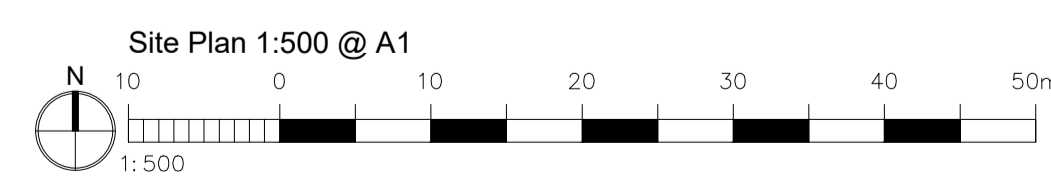
X A - Approved
 X B - Approved with comments
 X C - Do not use

Rev.	Revision Note/Purpose of Issue	Drawn By	Date	Chk By	Date
P02	Update Boundary	TM	23/06/23	NKS	23/06/23

Schedule of Accommodation

Mix of 1,2,3, & 4 bed homes including affordable housing.

Total 24 homes
 Site Area = 2.5 ha



For Elberry Properties

Land at Haslemere Road
 Liphook

Drawing title: Illustrative Site Plan

Drawn	Date	Checked	Date	Scale at A1
TM	01/05/23	NKS	01/05/23	1:500

Job No. 19-159 HSM MHA ZZ XX DR A SK06 P02

Purpose of Issue: PRELIMINARY

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**East Hampshire District Council
Our Local Plan 2021 – 2040**

Draft Local Plan Regulation 18 (Part 2)

February 2024

Contents:

- 1. Introduction**
- 2. Strategic Matters Including Spatial Strategy**
- 3. Detailed Matters and Development Management Policies**

1. Introduction

- 1.1. These representations have been prepared by Victoria Land, in respect of the current consultation on the Draft Local Plan 2021-2040.
- 1.2. These representations are in relation to interests held within the Local Plan area.
- 1.3. Our comments are predominantly in relation to detailed matters and development policy proposals.
- 1.4. At the outset we note that this consultation is at an early stage of the plan – making process. The absence of any comments in these representations should not be read as confirmation there is agreement with the text in the consultation document. Similarly, the representations set out below are subject to refinement and evolution as the Council develops its policy and publishes its evidence base.
- 1.5. In particular it is important that the plan is tested for viability purposes to ensure it is deliverable, with policy requirements refined accordingly depending on the outcome of this assessment work. In this context, we make the following representations:

2. Spatial Strategy Matters

- 2.1. We support the recognition that a range of settlements will need to contribute to accommodating growth. Whilst the importance of locating growth in sustainable locations is recognised, this needs to consider all elements of sustainability and the role that new development can play in enhancing and maintaining the sustainability of all levels of settlements for a variety of tenures.
- 2.2. We support the inclusion of a settlement hierarchy, which ensures consistency in approach. Similarly we support housing allocations across a range of locations within the hierarchy. However, there is an over reliance on housing allocations within tiers 1-3, with only four locations from tiers 4 & 5 selected. The other locations within these lower tiers are therefore reliant on windfall sites, as there does not appear to be any specific housing requirement for neighbourhood plans.
- 2.3. We welcome the opportunity for settlements outside the hierarchy to contribute to proportionate housing growth in line with policy NBE1.

Housing Requirement

- 2.4. In assessing the housing requirement, no allowance has been made for the unmet need in South Hampshire, that should be met by East Hampshire. We consider this approach to be unsound.

2.5 The overall minimum housing need is not broken down into the housing needs of individual groups, as confirmed in paragraph 9.14. Whilst specific policies are provided for affordable housing; self and custom build housing; older persons and other specialist housing, if the level of need for these specific groups is not identified, policies are unlikely to address the true housing need.

2.6 Whilst the site allocations includes 6 sites with less than 50 dwellings, the plan needs to go further to ensure that it is compliant with the new NPPF. The NPPF requires at least 10% of land identified to meet its housing need to be on sites no larger than 1 hectare.

3. Detailed Matters and Development Management Policies

Policy H2 – Housing Mix and Type

- 3.1. A broad mix of units should be provided within new developments coming forward within the plan period and the council should identify a sufficient number of sites to be allocated to deliver a mix of housing, both market and affordable.
- 3.2. The Councils should identify a sufficient number of allocations of a mix of sizes, sites and localities within the districts, whilst making sure that an appropriate level of larger sites are allocated to ensure that affordable housing is delivered within the plan period. The allocation of larger sites will present opportunities for a broad mix of tenures within sites, including a variety in size and type of affordable housing, but there are also challenges regarding viability and deliverability. Affordable housing need in these districts is acute
- 3.3. Whilst a need is identified for smaller homes and requirements of an aging population, the contribution family housing can make should not be ignored. The availability of family housing allows upward movement through the housing market, ultimately freeing up existing smaller housing stock to help meet these needs. Therefore a mix of all house types and sizes is essential to meet all needs.
- 3.4. We support the consideration of space standards through the local plan making process. Any future policy wording should allow flexibility for site-specific circumstances where meeting the proposed minimum standards might not be possible in certain circumstances.
- 3.5. We support the Council view that properties should present a level of adaptability and accessibility. It will be important that these requirements inform viability and site capacity assessments.

Policy H3 – Affordable Housing

3.6. We recognises the importance of affordable housing provision and the need for this to be considered through the plan making process in the context of up-to-date and detailed local evidence of housing need and viability. A balanced approach should be taken in setting the percentage requirement for affordable housing, reflecting evidence of infrastructure costs and values associated with the wider delivery of the plan.

Policy H4 – Rural Exception Sites

3.7. We highlight that the policy wording does not reflect the up to date version of the latest NPPF, with references to Entry Level Exception Sites, paragraph 72 and footnote 35 being incorrect.

3.8. The NPPF confirms that RES are to deliver housing to meet local needs in areas or on sites that would not otherwise deliver housing. Paragraph 9.70 of the supporting text identifies criteria for justifying need. The level of scrutiny suggested in part (a) is unnecessary. Points (b) – (d) reflect the intentions of the NPPF and there is no need for the additional wording at point (a). Need should not be restricted to the immediate parish. It is commonplace for cascade policies to apply, so that local need is accommodated first. However, if a need remains district wide, if a suitable site has been identified, it should be able to meet unmet needs across the district

3.9. Paragraph 9.66 states that RES are envisaged to be up to 20 dwellings. There is no evidence base to support this assertion, which should be removed. The NPPF does not limit RES to site size or unit numbers and developments should be assessed on their appropriateness to the location and level of identified need, to avoid constraining sustainable development. As stated above the policy is to deliver homes where there is a need in locations that would otherwise not deliver housing. Unjustified size restrictions could prevent needs being met.

3.10. The policy should ensure that it reflects the latest NPPF position.

Policy H5 – Specialist Housing

3.11. The plan identifies a growing need for elderly persons housing, with the percentage of the population over 65's higher than the averages for Hampshire and the South East. The number of people within this age bracket has increased 30% over 9 years. Support for specialist housing is welcome, recognising the contribution edge of settlement locations can play in the delivery of such housing.

3.12. The requirement to identify need for specific towns / parishes as set out in paragraph 9.75 will limit the contribution that specialist housing for the elderly can contribute to the overall need that the plan identifies across the whole district. As a district wide need has been identified for sheltered housing and housing with care, developments in all sustainable locations, should be acceptable.

3.13. The NPPF identifies the range of specialist housing for the elderly that should be acknowledged and delivered through Local Plans. The policy needs to recognise this.

Policy NBE1 – Development in the Countryside

3.16 – We welcome the inclusion of this policy to assist with the delivery of housing to meet specific needs.

3.17 We feel that the policy should be extended to include specific circumstances set out in Neighbourhood Plans. This will help support Neighbourhood Plans, which may also assist with the delivery of housing to meet specific needs.

Policy NBE 11 – Gaps Between Settlements

3.18 the supporting text at paragraph 5.82 suggests that this policy is to avoid coalescence between settlements, to protect the sense of openness and character. The policy itself is vague in terms of its aims, and as drafted is unclear how conflict with policy NBE 1 would be avoided, which permits certain development within the countryside.

3.19 We consider that the policy would be more effective if it was drafted to specifically to avoid coalescence.