

From: [REDACTED]
Sent: 04 March 2024 10:13
To: [EHDC - Local Plan](#)
Subject: Reg 18 Consultation on East Hampshire Local Plan 2021-2040 - Representations on behalf of Helios Property Ltd - Objection to Chapter 12 – Site
Attachments: [Reps to Reg 18 Consultation Covering Letter Helios Property Ltd.pdf](#)
[1 March 2024 Regulation 18 Reps - Land at Station Road Bentley.pdf](#)

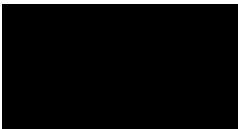
Categories: Consultation Responses

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Good morning,

Please see the attached.

Regards



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4 March 2024

Dear Planning Policy,

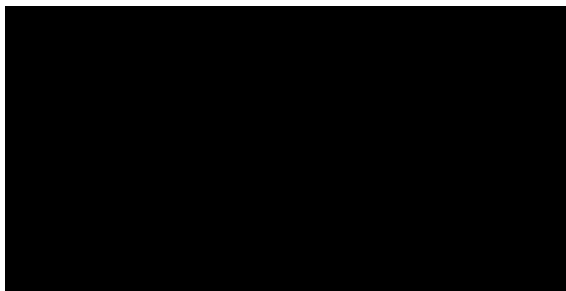
**Reg 18 Consultation on East Hampshire Local Plan 2021-2040
Representations on behalf of Helios Property Ltd – Objection to Chapter 12 – Site
Allocations**

Please find enclosed representations on behalf of Helios Property Ltd who have a legal interest in the land at Station Road (also known as River Road), Bentley.

For the reasons set out in the Statement we consider that this site should be allocated for housing development in the emerging local plan.

We are keen to see the plan progress in order for the Council's vision to be realised. We would be interested in meeting with the Council to discuss our client's land, which is available for residential development in the early years of the Plan period and in a Tier 3 settlement.

Yours sincerely,



Land at Station Road, Bentley

Representations to the East Hampshire Draft Local Plan

February 2024



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Section 1

Introduction

- 1.1. Solve Planning Ltd has been instructed to submit representations on behalf of our client, Helios Property Limited, in relation to East Hampshire's consultation on the Draft Local Plan 2021-2040 (Regulation 18 consultation). Our client has a contractual interest in the land. at Station Road (also known as River Road), Bentley which is outlined in Figure 1 of this report.
- 1.2. The purpose of these representations is to explain why the site is suitable for residential development (up to 50 new homes) in the context of policies in the Draft Local Plan.
- 1.3. Helios Property are promoting the site through the ongoing Local Plan process, and this would be the preferred route to securing development. The site was submitted in response to the Council's 'Call for sites' consultation, following which it has now been included in the Council's Land Availability Assessment (LAA) (2023) as site reference LAA/BEN-005.
- 1.4. The site was subject to pre-application discussions with the Council in 2021 for a proposal for 49 dwellinghouses. The proposal sought to highlight the suitability of the site for development and to resolve any technical points raised by the Council well in advance of any application being submitted.
- 1.5. This report is supported by a proposed concept plan demonstrating that the site can deliver residential development in a sustainable form as indicated at Figure 6 in this report.
- 1.6. The site provides an important opportunity to provide housing on a site which lies just outside the settlement boundary of the village of Bentley. It has potential to make a significant contribution towards meeting local housing need, and therefore assist the Council in meeting the Draft Local Plan's annual housing delivery target of 478 homes over the plan period (2021-2040).
- 1.7. For the reasons stated we are objecting to the following aspects of the Draft Local Plan:

 Chapter 12 Site Allocations



Section 2

Site Description and Context

Wider Context

- 2.1. The site lies to the south of the main road running east to west through the village of Bentley and to the east of Station Road and west of Rectory Lane. Bentley lies on the eastern edge of Hampshire, approximately 5 miles from both Alton to the west and Farnham to the east. A site location plan is provided at Figure 1.
- 2.2. In terms of its immediate surroundings, the site lies adjacent to:
 - ▣ To the north, the western half of the site lies adjacent to the main road running through Bentley (London Road) on the opposite side of which lies dwellinghouses. The eastern half of the site lies adjacent to a mix of residential properties and their rear gardens, and industrial units in Trimming Close.
 - ▣ To the south, the site lies adjacent to dwellinghouses on Old Station Road and Rectory Lane, and open space.
 - ▣ To the east, the site is bound by Rectory Lane on the opposite side of which lies open space and dwellinghouses.
 - ▣ To the west, the site is next to Station Road opposite which lies open space.
- 2.3. Bentley is considered a Tier 3 settlement in the Council's draft Settlement Hierarchy and is therefore acknowledged to be a sustainable settlement.
- 2.4. The village is relatively compact although it takes a more linear form at its eastern end, beyond this site.
- 2.5. The nature of local buildings is varied in age, style and form, but they are largely domestic in scale as one would expect in a village of this size. Examples of this are shown in Figure 1.
- 2.6. Within the wider landscape the site is afforded a high level of visual and physical containment. Views of the site from the wider landscape setting are restricted by the extent of intervening vegetation structure, topography and built form, including from the sensitive South Downs National Park and the more elevated ground to the north of the village.

- 2.7. The site lies just outside the settlement boundary of Bentley, which is classed as a Tier 4 Settlement ('Other settlements with a settlement policy boundary') in the Council's previous settlement hierarchy of five tiers (with the Tier 1 being 'Market towns' and Tier 5 being 'Small rural villages/hamlets within the countryside') in the adopted East Hampshire Joint Core Strategy (2014). Tier 4 settlements such as Bentley are identified as appropriate for limited local development provided it is consistent with maintaining and enhancing the local character.
- 2.8. However, as noted, the Draft Plan lists Bentley as a Tier 3 settlement, indicating that it proposes to upgrade Bentley from its current Tier 4 status following a review of the existing hierarchy. This confirms that Bentley has some potential for growth, including housing growth as indicated in Draft Policy H1, and for enabling residents to access services or facilities within a reasonable walking or cycling distance. Furthermore, although currently a tier 4 settlement in the Joint Core Strategy, Bentley has wider sustainability credentials with the location of the nearby train station.
- 2.9. In terms of access, being a privately owned site that is not publicly accessible, the site has no formal vehicular access roads or pedestrian footpaths into the site. New road and pedestrian connections would be provided as part of the redevelopment of the site.
- 2.10. In terms of public transport connections, there is a bus service running between Alton and Guildford which stops next to the site and Bentley station is less than a mile from the site with trains to London Waterloo.
- 2.11. Regarding schools, Bentley Primary School is located approximately 0.3 miles to the north. Other schools nearby include Binsted Primary school

**Figure 1:
Site
Location
Plan**



(2 miles to the southwest), Rowledge Primary School (4 miles to the south east) and a broad range of schools, including secondary schools, in Farnham and Alton which are both approximately 5 miles to the east and west respectively.

- 2.12. In summary, there are no undue constraints in the surrounding area that would preclude the development of housing on the site.

Existing Site

- 2.13. The site is 1.12 ha and L-shaped. It comprises two fields which are largely open but are bounded and intersected by tree and hedgerow cover.
- 2.14. The site is generally flat, and as such, there are no significant changes in levels across the site which could present a challenge to the redevelopment or accessibility of the site.
- 2.15. In terms of heritage context, the site does not contain any locally or statutorily listed buildings. However, two listed buildings lie in proximity to the site: Lime House, A31 Main Road (Grade 2 listed) and South Green, Rectory Lane (Grade 2 listed). The western half of the site is situated in the Bentley Conservation Area which was first designated in 1968 and then extended in 1978 and 1993. The Council published the Bentley Conservation Area Character Appraisal in 2014, which notes the importance of views of the wider Conservation Area across the site. It also identifies the listed building, South Green Farm to the southeast of the site.
- 2.16. With regard to flood risk, the site is in Flood Risk Zone 1. Importantly, it also lies outside the Source Protection Zone which lies to the north of Bentley. It therefore has a low probability of flooding, and the proposed residential development will therefore not be in an area of flood risk.
- 2.17. Being a mostly undeveloped site, it does not currently have full access to infrastructure and services. However, new infrastructure such as this will be constructed to support the proposed redevelopment of the site.
- 2.18. In terms of transport connections, the site is well connected by local roads and is relatively well served by local bus services with the nearest bus stops being located on Station Road to the west. In terms of rail services, Bentley train station is approximately 1 mile to the south and provides regular rail services to central London and destinations in the south and west.
- 2.19. Regarding the natural environment, with the site being largely undeveloped, it has the potential to be ecologically sensitive and this will be investigated with relevant professionals at the early stages of the design process.

Site Designations

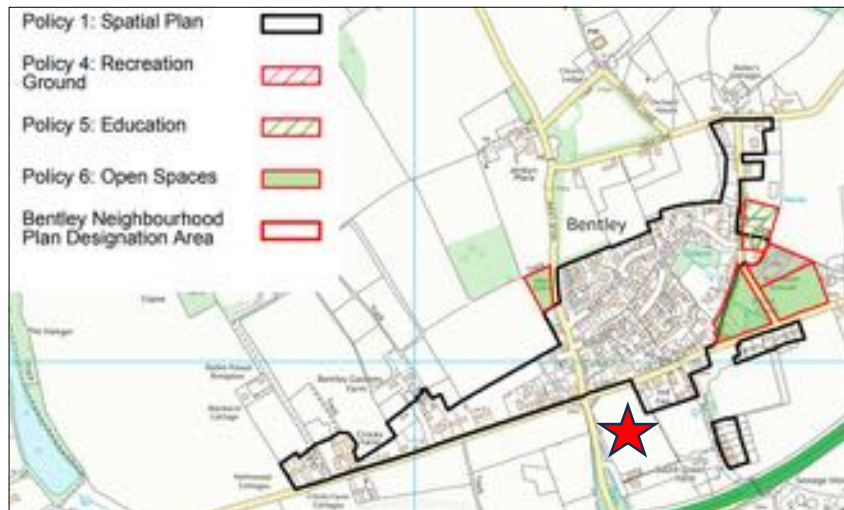
2.20. According to the Council's currently adopted Local Plan policies map, the site has the following designations:

- ☑ Conservation Area (western part of the site only)

2.21. The site is with the 5–7km risk zone of recreational disturbance to the Thames Basin Heaths Special Protection Area.

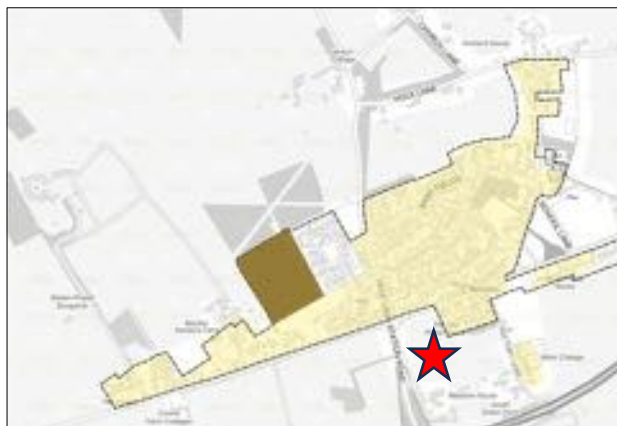
2.22. Bentley has a made Neighbourhood Plan (2016) which has no specific designations. According to the policies map in the Bentley Neighbourhood Plan (2016), the site falls outside of the Bentley Settlement boundary.

Figure 2: Bentley Neighbourhood Plan Policies Map (Site denoted by red star)



2.23. We also note that the site lies outside of the settlement boundary of Bentley in the Draft Local Plan Policies Map as shown in Figure 3. The Draft Policies Map also shows a proposed site allocation in Bentley (see area in brown in Figure 3 below) known as 'BEN1 – Land west of Hole Lane, Bentley'.

Figure 3: Draft Local Plan Policies Map extract (Site denoted by red star)



- 2.24. Draft site allocation BEN1 is a 2.5 ha agricultural site, with a proposed future use as 20 new homes.
- 2.25. In terms of site designations in the wider area, the primary planning designations comprise the Bentley Conservation Area and the South Downs National Park which are shown in Figure 4a. The larger of the two fields in the western half of the site lies within the Conservation Area as can be seen in Figure 4b. Figure 4b shows the rights of way which are relevant to the site including one which crosses the northwestern end.

Figure 4a: Planning Designations



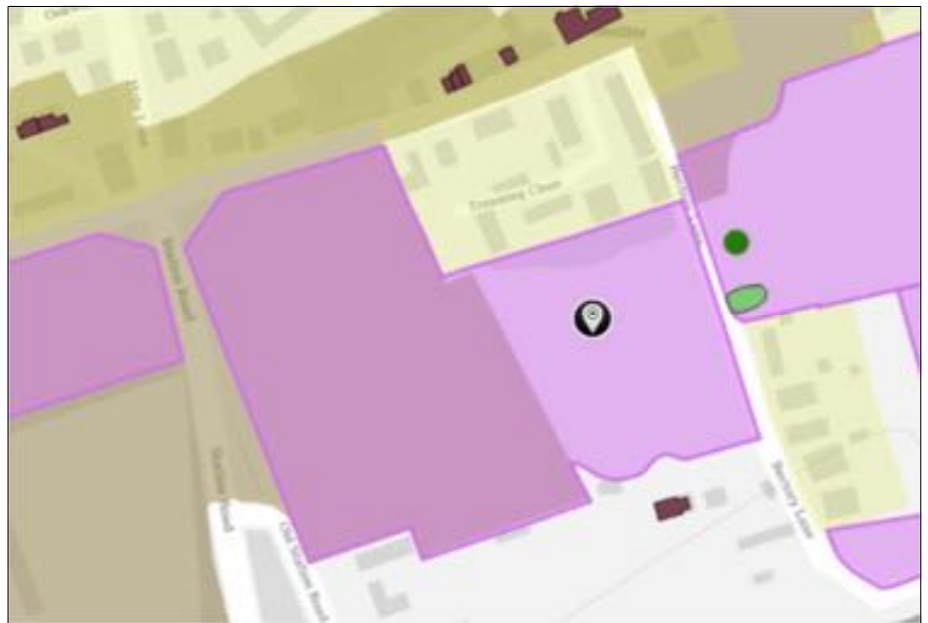
Figure 4b: Planning Designations



- 2.26. The site was put forward in response to the Council’s Call for sites consultation, and it has been included as a site in the Council’s Land Availability Assessment (LAA) (2023), with an identified capacity for 42 units (reference BEN-005) as shown in Figure 5.

Figure 5: Extract from the LAA (2023)

Site ref: LAA/BEN-005
Site name: Land west of Rectory Lane, Bentley
Site address: Land west of Rectory Lane, Bentley
Parish: Bentley
Promoted: Residential/Older persons/Employment
Capacity: 42
Status: Included
Area: 1.12
Timescale: 0-5 years
Suitability: Small area has surface water flooding, adjacent to Bentley Conservation Area and a listed building
Conclusion: Developable



Pre-Application Discussions

- 2.27. Our client undertook pre-application discussions with the Council in 2021 for a 49-unit scheme, including 19 affordable units (38%). The Council’s written response advised that as the site falls outside the settlement boundary, it is therefore located within the countryside. As such, the principle of development would not be supported. The Council noted that efforts are underway to promote this site through the Local Plan process, and that much will depend on the outcome of the site's promotion through the Local Plan process.



Section 3

Proposed Development

- 3.1. The draft concept plan in Figure 6 has been designed with a view to accommodating up to 50 new homes on the site.
- 3.2. The final layout plan will look to overcome the Council's concerns raised at the pre-application stage, by ensuring that the final proposals are not overly dense and incorporate a more irregular and looser layout with more spacing between side boundaries. The proposal will also safeguard the tranquillity and rural character of the site, and views in the conservation area.

Figure 6: Proposed Concept Layout





Section 4

Planning Justification

- 4.1. This Section considers the proposed development in the context of the Draft Local Plan and explains how it positively addresses the policy requirements of the Draft Local Plan.

The Principle of Development

- 4.2. Draft Policy S1 states to help achieve sustainable growth, the Council will ensure development is distributed in accordance with the spatial strategy and in line with the settlement hierarchy, with a greater proportion of development in the larger and more sustainable settlements.
- 4.3. Draft Policy S2 confirms that the broad distribution of development will be shaped by the role and function of places, based on the hierarchy of settlements listed in this policy. Bentley is listed as a Tier 3 settlement, which is an upgrade from its current Tier 4 status in the Joint Core Strategy (2014). There is a presumption in favour of sustainable development within the Settlement Policy Boundary (SPB).
- 4.4. Whilst the site falls outside of the SPB, in our opinion, the proposal is considered to fulfil the criteria referred to in Draft Policy S2 for reviewing SPBs. Specifically, the proposal will:
- ▣ Respect the setting, form and character of the settlement. This will be achieved by incorporating generous landscaped buffers around the site and a generous provision of public open space within the development to respect the setting of the wider village and the proposed development. The proposal will also introduce an organic and irregular form of development to reflect the existing character and form of development in the village.
 - ▣ Avoid actual or perceived coalescence of settlements. Due to the physical containment of the site through landscaped buffers, along with proximity of the development to the Bentley (it will lie just outside the site boundary, rather than any significant distance from the village itself), the proposal will not result in coalescence of settlements. Bentley is also relatively distanced from any neighbouring settlements. The proposed development will therefore also ensure that it maintains the

open character and appearance of the countryside between settlements and the individual identity of towns and villages, in accordance with Draft Policy NBE11.

- ▣ Ensure good accessibility to local services and facilities. Bentley has some amenities, services and public transport connections, as described in section 2 of this report. The Draft Local Plan also proposes to upgrade it from a Tier 4 settlement in the Joint Core Strategy to a Tier 3 settlement, which indicates that it can accommodate a larger level of growth. The Draft Local Plan notes that although Tier 3 settlements do not have as wide a range of services as the higher order settlements (Tiers 1 & 2), they are still sustainable locations. Furthermore, we note that Draft Policy H1 states that Tier 3 settlements are required to provide 600 homes (whilst Tier 4 & 5 settlements are only required to provide 100 homes). The capacity for Bentley to deliver more homes is also evidenced in the draft site allocation the Draft Local Plan at BEN 1 – Land West of Hole Lane, Bentley, which is a 2.5 ha agricultural site, with a proposed future as for 20 new homes.

4.5. Due to the site being outside the settlement boundary, it is classed as development in the countryside in the context of the Draft Local Plan. Draft Policy H1 states that housing outside SPBs will be permitted where it accords with Policy NBE1 or is allocated for development in the Local Plan or is identified in a 'made' neighbourhood plan. The site is neither identified in the Neighbourhood Plan or the adopted or Draft Local Plan as an allocated housing site. The purpose of these representations however is to promote the site for housing through the Local Plan process. With regard to the whether the proposal accords with Draft Policy NBE1, policy NBE1 states that proposals within the countryside will only be supported where they meet certain criteria (such as: meeting the proven essential need of a rural worker to live permanently at or near their place of work, or providing business floorspace on existing employment sites, or providing community facilities close to an existing settlement which is accessible by sustainable transport modes, or providing affordable housing on rural exception sites or providing a replacement dwelling). Whilst the site does not meet any of the criteria listed in Draft Policy NBE1, it is nonetheless considered to be a sustainably located site for new housing development due to its close proximity to the settlement boundary, and therefore its proximity to services, amenities and public transport connections in the village of Bentley.

4.6. Furthermore, by having capacity to deliver up to 50 new homes, it will make a significant contribution towards meeting the Council's housing provision target, which is described in Draft Policy S1 as being at least 9,082 new homes between 2021 to 2040 (equivalent to 478 homes per

annum). By providing a mix of dwelling sizes, the proposal will contribute towards meeting the housing needs of different household sizes in the area.

- 4.7. It is also noted that the site is included in the Council's Land Availability Assessment (LAA) (2023) as site reference LAA/BEN-005, with the Council's reasons for including the site being because it is relatively well-located and close to facilities and services in the centre of Bentley. The site scores above average in the Council's Accessibility Study, and the LAA confirms that impacts on environmental constraints (green infrastructure, flood risks) could be avoided or mitigated by appropriate design and layout, and the sensitive design and arrangement of new buildings could reduce built heritage and landscape concerns.
- 4.8. The LAA also notes that maintaining and augmenting green infrastructure on the site boundaries could enhance the site's sense of containment, helping to avoid adverse impacts on residential amenity to the east and that new vehicular access could be provided by extending roads that were built to serve the housing development to the east. As such, the site is clearly available for development, and it is possible to overcome environmental constraints and other concerns. The delivery of a suitable, well-designed housing development on the site is therefore possible.
- 4.9. Whilst the surrounding area includes a mix of uses, including the industrial uses to the east, it contains large areas of residential development. A proposed residential use on the site, will therefore be in keeping with surrounding residential uses.
- 4.10. In terms of deliverability, our client is looking to deliver the site as soon as possible. As the site is largely clear of any built form, it is available for development and once utility infrastructure is in place, development on the site can come forward quickly and will not be delayed by works such as demolition or remediation that may be required on other larger sites.

Housing Mix

- 4.11. Draft Policy H2 requires proposals for residential development to demonstrate how they will address the need for smaller homes and the requirements of an ageing population and people wishing to downsize, including the provision of single-storey dwellings, taking account of the most up to date housing information.
- 4.12. The Council's pre-application response confirms there is need for 1, 2 and 3 bedroom units perhaps with a very small number of 4 beds.
- 4.13. The development will introduce a range of new homes to respond to local housing need requirements and to respond to the housing needs

of different households. The proposal will therefore introduce a mixed housing community and respond to a range of housing needs.

Affordable Housing

- 4.14. Draft policy H3 requires all developments proposing 10 dwellings or more (or is on sites of over 0.5 hectares) to provide at least 40% affordable housing, of which 70% will be affordable housing for rent, of which a minimum of 25% should be provided as social rent; and the remainder (30%) as other affordable home ownership products to be agreed with the Local Authority. The site can support fully compliant affordable housing.

Impact on Heritage Assets

- 4.15. Draft Policy NBE14 requires proposals to protect, conserve and, where possible, enhance the significance of designated and non-designated heritage assets and the contribution they make to local distinctiveness and sense of place.
- 4.16. Draft policy DM3 requires development in a conservation area to aim to preserve or enhance the special architectural, historic character or appearance. Development within, affecting the setting of, or views into and out of, a conservation area should preserve or enhance all features that contribute positively to the area's special architectural, historic character, appearance or setting. Regarding listed buildings, Draft policy DM4 states development affecting the setting of listed buildings, should preserve and enhance their character and appearance and the special features for which they are designated.
- 4.17. Most of the site falls within the Bentley village conservation area and a listed building lies near the southern boundary.
- 4.18. The proposal is sympathetically designed to ensure that it safeguards the character and appearance of the conservation area and the setting of the listed building to the south. It involves leaving a large area of undeveloped land in the site's northwest corner to allow key views into the site from Main Road and an opportunity for landscaping enhancements and the provision of public open space, which could act as a gateway feature into the site. By leaving this area of the site as undeveloped, the proposal will safeguard views in the Conservation Area. The density of the proposed development will also be reduced in the area of the site that falls within the conservation area, and landscaped buffers will provide a visual screen to the development and soften its appearance, so as not to affect the character and appearance of the conservation area, or the setting of the listed building. This will

all be further explained in a Heritage Statement that will accompany any final planning application to be submitted.

Impact on Thames Basin Heaths Special Protection Area (TBHSPA)

- 4.19. The site lies within the 5–7km risk zone of recreational disturbance to the TBHSPA. Draft Policy NBE5 requires development proposals for residential development resulting in a net increase in dwellings within the buffers of TBHSPA to be supported by a Habitats Regulations Assessment (HRA) setting out the likely impacts of the development on the interest features of the SPA. Details of any avoidance and/or mitigation measures will need to be assessed on a case-by-case basis by the Council, following agreement with Natural England. The applicant will discuss the proposal with Natural England as necessary and ensure that the Appropriate Assessment concludes that there are no adverse effects on the integrity of the TBHSPA.

Standard of Residential Accommodation

- 4.20. The proposal will deliver a high standard of residential development compliant with nationally described residential space standards and any other relevant local standards, as required by Draft Policy DES2. It will provide adequate private amenity space for new residential uses and will ensure sufficient separation distances between buildings to avoid undue over-looking or over-shadowing.
- 4.21. As the community will be master planned, the design of the new homes will be optimised to deliver a high standard of residential accommodation with matters such as aspect, orientation and separation distances to neighbouring dwellings being important considerations. In terms of land contamination issues, as the site is largely garden land, it does not present any land contamination risks for future residential development, and therefore a land contamination study will not be required.

Design and Character

- 4.22. The site provides an opportunity to deliver buildings of significant design quality that set the benchmark for new housing design in the local area. Our client has also had pre-application discussions with the Council, which will be considered when finalising the designs.
- 4.23. The design of the site appropriately responds to the site and surroundings and is based upon a design-led approach that is sensitive of the site's rural and heritage context. The proposal provides an opportunity to significantly uplift the design quality of the site and

respond to the requirements of Draft Local Plan policies DES1, DES2 and DES3 by delivering a development which:

- ▣ Delivers visually attractive buildings that are high in architectural standard and appropriate in height, scale, massing, layout and siting.
- ▣ Integrates well with existing streets, cycle and walking connections and where relevant extends these movement networks within a development site.
- ▣ Incorporate lower density development in the western half of the site to preserve the character of the conservation area.
- ▣ Includes a central green space which will provide both recreational space and an interruption to the built form of the site, to ensure that the site is sensitively developed and not overly dense.
- ▣ Follows the energy hierarchy through its block, plot and/or building layout and design, whilst maintaining or enhancing the landscape and built character of its immediate surroundings and the wider local area.
- ▣ Incorporates contextually appropriate and low embodied carbon building materials of a high quality and durability.
- ▣ Ensures that the design of new buildings, open spaces and streets would provide passive surveillance of the public realm and security for private areas.
- ▣ Provides car parking in ways that would remove cars from the street or that would not enable cars to visually or physically dominate local streets.
- ▣ Incorporates landscape buffers to the site boundaries which will improve the setting of the proposed built form, provide a softer edge to the development and act as a visual screen. The buffers will also create some physical containment to the site and ensure that the proposed development does not harm the setting of the listed building to the south.
- ▣ Retains a tree belt to the south of the site to maintain a green link and to enhance ecological connectivity
- ▣ Has due regard to the density, scale, layout, appearance, architectural detailing, materials and history of the surrounding area, and the relationship to neighbouring buildings, landscape features.
- ▣ Incorporates a high-quality public realm and landscape.

4.24. In addition, the proposal will not affect any strategic gaps and will therefore not result in coalescence of built-up areas and will maintain the separate identity of settlements in accordance with Draft Policy ENV2.

Density

- 4.25. The density of the proposed residential development should be within the range of existing residential densities on streets adjoining the development site, or the proposed built form should be accommodated in a manner that is consistent with the predominant pattern of development for streets and blocks adjoining the development site, in accordance with Draft Policy DES3.
- 4.26. The proposed density of the site will respect the site's rural context and provide an appropriate balance in terms of delivering a range of different house types, delivering a viable development and ensuring that a balance of built form, open space and hardstanding is achieved on site to ensure that the site is not overdeveloped. The density of development will be reduced in the western half of the site that falls within the Conservation Area, to safeguard its character and appearance.

Trees and Landscaping

- 4.27. The proposals will be supported by a comprehensive and site-wide landscaping scheme which will be sympathetic to the character and visual quality of the area. Due to the appropriate scale, siting and design of proposed built form on the site, the development will respect, enhance and not be detrimental to the character or visual amenity of the landscape. We note that the site is not within or adjacent to a particular sensitive or high value landscape designation. Notwithstanding this, landscaping is an important consideration in the successful delivery of the proposal.
- 4.28. In addition, as the site has not been identified as a particularly environmentally sensitive site in that it does not benefit from any international, national or local planning policy designations such as AONB, it is less sensitive to development in this regard. Notwithstanding this, the site's ecological value will be assessed and opportunities to enhance the site's biodiversity will be explored.
- 4.29. The development will ensure that the site is landscaped to a high standard and delivers a high quality, accessible public realm. The proposed landscaping will be used to soften the appearance of built form on the site and provide screening where needed. Landscaping is likely to also provide an important role in terms of wayfinding within the new master planned community and in creating a sense of place.

Residential Amenity

- 4.30. The proposal seeks to ensure a high standard of residential amenity for both prospective occupiers of the development and neighbouring residential occupiers in accordance with Draft Policy DM11. By introducing appropriate separation distances and human scale development, the proposal will safeguard amenity of neighbouring residential development in terms of sunlight, daylight, sense of enclosure, privacy and noise.

Sustainability and Energy Efficiency

- 4.31. The proposals provide an opportunity to deliver buildings that perform to a high standard in terms of sustainable design and energy efficiency. In accordance with Draft Policy CLIM1, the proposal will contribute to mitigating future climate change, whilst adapting to its impacts and helping society to meet climate-related objectives. The development will reduce carbon emissions in accordance with the energy hierarchy and the final planning application will be accompanied by an Energy Statement.
- 4.32. Draft Policy CLIM1 requires the operational carbon dioxide emissions of residential development such as this to be reduced to a net-zero level through on-site measures that are appropriate to site-related constraints and opportunities. The proposal will explain how policy requirements such as this are met in the technical documentation to be submitted with any final planning application.
- 4.33. The proposal will also be accompanied by a Sustainability Statement, setting out the proposal's sustainability credentials in terms of waste, water use, climate change, and will therefore comply with the objectives of Draft Policy CLIM1.
- 4.34. In accordance with Draft Policy CLIM5, the proposal will be designed to avoid or minimise the risks associated with a changing climate. The proposals will incorporate measures that ensure the safety, comfort, health and well-being of occupiers and visitors. Details of such measures will be provided in the Design and Access Statement, Planning Statement and other technical documents to be submitted when the final planning application is submitted.

Flood Risk and Drainage

- 4.35. The site is in an area of low probability of flood risk (Flood Risk Zone 1) and accordingly, the proposed development is not at risk from flooding. Any planning application for future development on the site will be accompanied by a Flood Risk Assessment which will provide details of

sustainable urban drainage systems in accordance with Draft Policy CLIM1 and NPPF requirements. In accordance with Draft Policy CLIM1 and NBE7, the proposal avoids areas at the greatest risk of flooding and will be designed to help minimise flood risks and provide resilience against flood events.

- 4.36. Any final application will be accompanied by details confirming that, as a minimum, there is no net increase in surface water run-off, in accordance with Draft Policy NBE7, which gives priority to the use of SuDS to manage surface water drainage and requests that these are considered from the outset.

Highways and Sustainable Travel

- 4.37. The proposals provide an opportunity to improve pedestrian and cycle connectivity, both within the scheme and the wider area. The proposals are also likely to present opportunities for public transport enhancements through developer contributions. Pedestrians, cyclists and public transport are placed at the heart of the development, with the proposed layout delivering a permeable, safe and well-connected environment for all.
- 4.38. In accordance with Draft Policy DGC2, the redevelopment of the site will ensure that safe and suitable access to the site can be achieved and ensure that the development will not result in any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety. The final planning application submission will be accompanied by a Transport Assessment. The proposal will demonstrate suitable transport accessibility and connectivity, including limiting the need to travel. The proposal will prioritise and maximise active travel and public transport use.
- 4.39. In accordance with Draft Policy DCG2, the proposal will deliver inclusively designed streets that are safe and accessible for all the community and relevant services, including emergency and refuse vehicles. It will also provide parking for a range of vehicles, including cycle, electric and ultra-low emission vehicles, in accordance with the Council's standards.
- 4.40. In accordance with Draft Policy HWC1, the proposal will support access to sustainable modes of travel, including safe, well-designed, and attractive cycling and walking routes and easy access to public transport to reduce car dependency.

Biodiversity Net Gain and Ecology

- 4.41. The proposal provides an opportunity for biodiversity enhancements which will be explored further with relevant professionals as the final

planning application progresses. Through appropriate landscaping and other ecological initiatives, the redevelopment of the site will increase the ecological value of the site resulting in it making a greater contribution to biodiversity and ecology than it does at present. The proposal will positively accord with Draft Policy NBE2 by avoiding harm to biodiversity and/or geodiversity or, where that is proved not possible, be adequately mitigated. The final planning application will be accompanied by relevant Ecology surveys and BNG information measured through the submission of a required biodiversity metric and biodiversity net gain plan and to cover a time period of at least 30 years. The submission of a 30-year management plan detailing how the post-development biodiversity values of the site and any supporting off-site mitigation will be achieved and funded will be provided as required.


- 4.42. Draft Policy DM1 does not permit development which harms the local ecological network unless the need for and benefits of the development outweighs the harm, and if harm cannot be avoided measures which mitigate or compensate that harm will be required. The final proposals will be accompanied by an assessment of the implications for the local ecological network. It will be supported by mitigation plans and or compensation plans, which will deliver a net gain for biodiversity and which set out in perpetuity the maintenance and funding of any measures.
- 4.43. The final planning application will also be accompanied by information setting out how the proposal positively responds to the existing green and blue infrastructure network and individual sites, including details of how any adverse impacts will be mitigated or compensated, in accordance with Draft Policy NBE12.



Section 5

Conclusions

- 5.1 For the reasons given in this report, this site is acceptable for a residential development of up to 50 units. Despite being located outside the Bentley settlement policy boundary, the site is only just beyond the boundary and therefore is physically close to the village. Bentley provides a range of services, amenities and public transport connections, and its proposed upgrade to a Tier 3 settlement in the Draft Local Plan indicates that it has capacity for further growth, including housing growth as confirmed in draft policy H1. The site is identified in the LAA and therefore is available for development. The LAA identifies some of the many strengths of the site, such as its proximity to local services and ability for designs to overcome environmental, heritage and residential amenity constraints. Bentley also includes a site allocation in the Draft Local Plan for 20 new homes (reference BEN1 – Land west of Hole Lane, Bentley), indicating that the village clearly has capacity for development.
- 5.2 The proposed development will positively address the site's heritage constraints by introducing lower density development in the western half of the site falling within the Bentley Conservation Area and including a large open space in the northwest corner to maintain views in the conservation area. Proposed landscaped buffers on the site edges will provide a visual screen to the development, soften its edges and ensure that the setting of the listed building to the south is unharmed.
- 5.3 The proposal for new homes on the site will contribute towards meeting the Council's housing delivery target in the Draft Local Plan and will deliver a range of unit sizes reflecting local housing need.
- 5.4 A new residential development on the site provides an opportunity to showcase the site in terms of design quality, sustainability credentials, public realm, standard of residential accommodation, sustainable transport initiatives and biodiversity. For these reasons and all other points raised in this report, the site positively accords with policies in the Draft Local Plan.
- 5.5 For the reasons stated we are objecting to the following aspects of the Draft Local Plan:

 Chapter 12 Site Allocations

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	Initials	Date
Prepared by	█	01/03/2024
Checked	█	01/03/2024

REPRESENTATIONS ON
THE EAST HAMPSHIRE DISTRICT
COUNCIL DRAFT LOCAL PLAN 2021-2040

Alexandra Webb
BSc (Joint Hons) MSc MRTPI



Client: ██████████

Date: February 2024.

Ref: EH/573/AP.

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1.0 INTRODUCTION

- 1.1 These representations have been prepared by Southern Planning Practice Ltd on behalf of [REDACTED] who owns land north of Cedar Stables, Medstead in response to the current consultation on the Draft East Hampshire Local Plan 2021 – 2040 (hereinafter referred to as the DLP). The land owned by [REDACTED] is considered suitable for allocation in the DLP as an alternative to those sites allocated for development, subject of the current public consultation. We can confirm it is available, suitable, achievable and deliverable and would help to meet East Hampshire’s housing need in a sustainable way whilst also providing benefits to the local community and the District’s economy.
- 1.2 Whilst we can see the benefit in allocating large, strategic sites, we are concerned that the spatial strategy contained in the DLP, over relies on the delivery of large, strategic sites without recognising the important contribution small and medium sites can make to meeting the housing requirement and how they can be built-out relatively quickly compared to larger sites¹. We believe that the alternative options do not appear to have been thoroughly considered.

¹ Paragraph 70 of the NPPF December 2023

2.0 COMMENTS ON THE DRAFT LOCAL PLAN

Spatial Strategy (Policy S1)

- 2.1 Policy S1 of the DLP states that the local planning authority will seek to deliver a minimum of 9,082 new homes between 2021 and 2040. This equates to the delivery of 478 dwellings per annum (dpa) between 2021 and 2040. The remaining 2,857 homes to be delivered following the 6,225 dwellings to date² 179 dwellings per annum over the remainder of the plan period based on the proposed phasing of the housing requirement set out in Policy S2.
- 2.2 The latest Five-Year Housing Land Supply Statement (2022/23-2027/28) confirms that although there is a total of 1,512 (1096 with detailed planning permission and 416 with outline planning permission) new homes on large sites with planning permission, only 377 (or 25%) of these are completed.
- 2.3 It is unclear how the proposed sites being considered for allocation in the Local Plan will assist in delivering the identified housing requirement in the timescales envisaged. This is important, especially when considering the requirements of paragraph 60 of the NPPF which makes it clear that it is important that a sufficient amount and variety of land can come forward where it is needed to assist with the Government's objective of significantly boosting the supply of new homes.
- 2.4 The EHDC Land Availability Assessment 'LAA' 2023 indicates the majority of the large, strategic sites will not start providing completions until the latter end of the proposed plan period (6-10 years) and some will not be fully complete until next plan period (11-15 years). It is pertinent to note that in order to have a robust five-year housing land supply, in addition to focusing growth within or adjacent to the principal settlements of the district, the Council should look to all tier settlements in the hierarchy to deliver homes through a range of small, medium and strategic sites.

² 940 net completions, 3,965 existing planning permissions and additional 1320 windfall allowance as of 31.03.2023

Housing Strategy (Policy HI)

- 2.5 We support the expansion of the settlement boundary for Medstead (a Tier 4 settlement).. Policy HI sets out that 100 new homes will be provided within Tier 4 and 5 settlements. Growth in such settlements is strongly encouraged, however, we believe that this figure should be increased, particularly if not all allocations not come forward in the timeframe envisaged or the or the capacity of the larger sites are reduced. A reduction in capacity on the sites may be likely due to the recent introduction of Biodiversity Net Gain (BNG).

Site Allocations

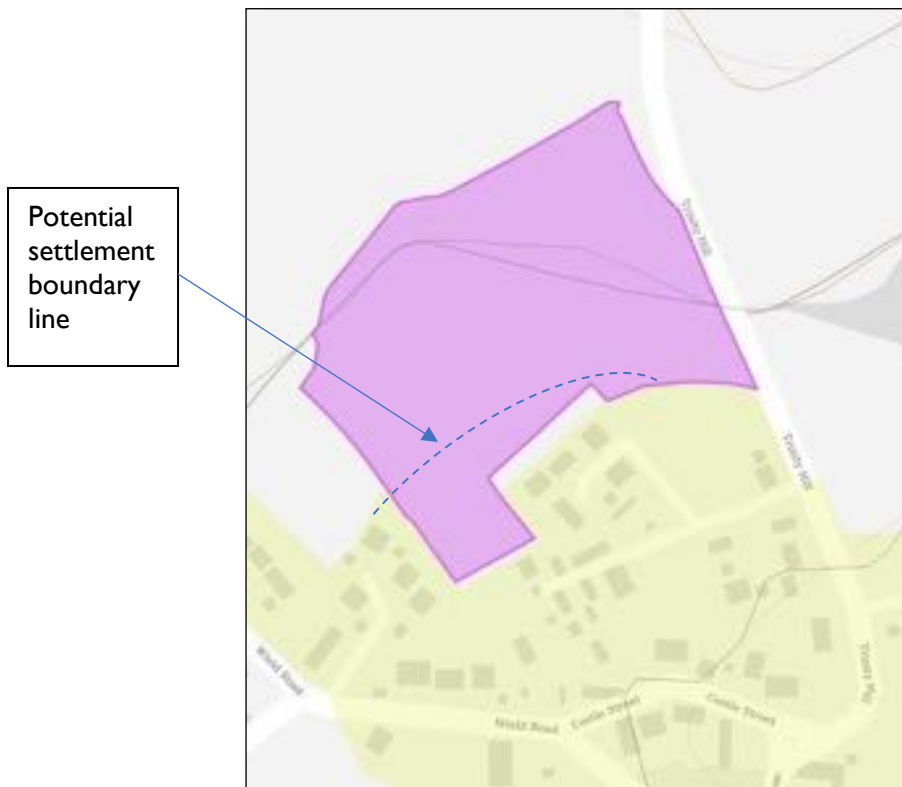
- 2.6 Figure 12.1 of the DLP sets out the total number of homes that would be delivered by allocations in the DLP and breaks this down to how many per settlement. As BNG) is a now a mandatory requirement for all development in England these figures may need to be checked and reviewed. If BNG is to be provided on-site, it would likely impact on the net to gross ratio of development, particularly for smaller sites. There may be a need to reduce housing density to accommodate for habitat enhancements. A precautionary approach in terms of the interpretation of the potential housing capacity figures put forward for allocated sites should therefore be taken.

North Area: Remaining Settlements and Site Proposals

Figure 12.29 Current Planning Applications and Proposed Allocations - Medstead

- 2.7 Further expansion to the north (Trinity Hill) to incorporate included EHDC Land Availability Assessment 'LAA' site LAA/MED-021 would be encouraged alongside the proposed expansion to the south west of Wield Road, to the south of the village (incorporating Land r/o Junipers MDS1) and the further extension east of the Village, along Hussle Lane/Abbey Road.



- 2.8 Our client owns land north of Cedar Stables, Medstead which is available and suitable to provide a residential development of up to 40 dwellings. The site was submitted in response to the 2018 call for sites and is included in the EHDC LAA 2023. The land originally formed part of a larger parcel of land which has since been developed for housing. The land to the south west has also been developed for housing.
- 2.9 The site is in a sustainable location for new residential development as it adjoins the settlement boundary for Medstead and lies close to the centre of the village where there is a good range of facilities available (e.g. shop, church, school, hall and recreation ground), all of which are within walking distance.
- 2.10 Inclusion of the additional area to the north of Cedar Stables could provide a logical ‘rounding off’ the settlement boundary and bring a wider public benefit as it would reduce the potential for piecemeal development.



Extract from EHDC Land Availability Assessment ‘LAA’ site LAA/MED-021

Site Allocation: Land rear of Junipers' (MDSI)

- 2.11 It is noted the site 'Land rear of Junipers' (MDSI) has been allocated for residential development of up to 15 homes. It is mentioned in the site description that the "site scores above average within the Local Planning Authority's Accessibility Study". Transport consultants: Ridge and Partners were commissioned to undertake the Accessibility Study on behalf of EHDC. Having looked at the 'East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology' the first report to be published in November 2023 was 'Report 2: 'Decide and Provide' Approach to Preparing Transport Evidence' but there are no site-specific scores within this document. The following 'Report 1: East Hampshire Accessibility Study' dated 24.01.2024 shows the site scores but was published after the consultation period on the Draft Local Plan 2021-2040 opened. It is not therefore clear how this detailed evidence base would have been taken into account during the formulation of the site allocations.
- 2.12 The findings from table 5.1 and 5.2 from the 'East Hampshire Living Locally Accessibility Study and Decide & Provide Methodology Report 1: East Hampshire Accessibility Study' are summarised below:

Site Name	Living locally accessibility Score	Extract from figure 5.2 of the Accessibility Study
Land r/o Junipers (MDSI)	14	
Land north of Cedar Stables	8	

2.13 ‘Land to the rear of Junipers’ (MDSI) has scored 6 points (almost 50%) above ‘Land north of Cedar Stables’ but is only located 200m to the south. It is unclear why ‘Land north of Cedar Stables’ is not considered to meet the threshold of being within 10min walk or cycle ride and included in the list of sites that do “not have access to hospitals, dental surgeries or opticians” when it is only a 9-minute cycle ride away to the nearest Dental Clinic and 8-minute cycle ride to Mansfield Park Surgery. Both sites have limited access to 5 of the education facilities listed.

2.14 Table 5.6 considers opportunities and constraints and claims that ‘Land to the rear of Junipers’ (MDSI) to be “remote from regular bus services” and ‘Land north of Cedar Stables’ is classed as being “remote in location and regular bus services do not operate nearby”. Given

the proximity to one another and to the village core, 'Land north of Cedar Stables' is not considered to be any more remote compared to the proposed allocation of 'Land rear of Junipers' (MDSI).

- 2.15 The scoring system and findings in this study should therefore be reviewed as it has been used for the basis of the site selection. We believe 'Land north of Cedar Stables' should have scored higher than that given and should be more like a score of 13, more akin to the score given to 'Land to the rear of Junipers' (MDSI).

Suggestions and alternatives

- 2.16 It is considered that the LPA should seek to take both sites forward for allocation given their similarities in terms of timeframe for development and development capacity. Further, as highlighted previously the NPPF emphasises the importance of allocating small and medium sized sites to bolster and maintain a consistent housing supply throughout the plan period.
- 2.17 Part of 'land north of cedar stables' could also accommodate a proportion of the 15 houses proposed for Medstead (figure 12.1) if the density of development for MDSI is reduced as a result of the need to accommodate on-site BNG.

3.0 CONCLUSION

- 3.1 It is considered that the proposed spatial strategy relies too heavily on the provision of larger site allocations for housing provision which the Council (as well as the site promoters) have acknowledged are unlikely to deliver new homes until later in the plan period, when the need is now. Plans need to be prepared positively in accordance with paragraph 16 of the NPPF and at present, I do not believe this is the case with the EHDC Draft Local Plan 2021-2040 due to the over reliance on strategy sites.
- 3.2 The spatial strategy could be improved by making a number of smaller site allocations in accordance with paragraph 70 of the NPPF which would provide a more flexible and responsive housing land supply and deliver new homes earlier in the plan period to meet the current national need for new housing.
- 3.3 The total number of homes per settlement that would be delivered by proposals should be adjusted now to reflect the mandatory requirement for BNG, particularly for sites that will provide on-site BNG.
- 3.4 The scoring system and findings in the 'East Hampshire Living Locally Accessibility Study and Decide and Provide Methodology Report I: East Hampshire Accessibility Study' should be reviewed as there appear to be inconsistencies in the scores. 'Land north of Cedar Stables' should have scored higher with a score of 13. The background documentation seems to be flawed and brings into question the analysis of the sites for suitability for allocation.
- 3.5 In light of the above, it is considered that 'land north of Cedar Stables' should also be allocated for development alongside 'Land rear of Junipers'.

Representations on the Draft East Hampshire Local Plan 2021 – 2040

These representations have been prepared by Southern Planning Practice Ltd on behalf of [REDACTED] who owns 'Land at Paice Lane, Medstead' in response to the current consultation on the Draft East Hampshire Local Plan 2021 – 2040 (hereinafter referred to as the DLP).

The land owned by [REDACTED] is considered suitable for allocation in the DLP as an alternative to those sites allocated for development, subject of the current public consultation.

We can confirm it is available, suitable, achievable and deliverable and would help to meet East Hampshire's housing need in a sustainable way whilst also providing benefits to the local community and the District's economy.

Whilst we can see the benefit in allocating large, strategic sites, we are concerned that the spatial strategy contained in the DLP, over relies on the delivery of large, strategic sites without recognising the important contribution small and medium sites can make to meeting the housing requirement and how they can be built out relatively quickly compared to larger sites, as encouraged by Paragraph 70 of the NPPF. We believe that the alternative options do not appear to have been thoroughly considered.

Spatial Strategy (Policy S1)

Policy S1 of the DLP states that the local planning authority will seek to deliver a minimum of 9,082 new homes between 2021 and 2040. This equates to the delivery of 478 dwellings per annum (dpa) between 2021 and 2040. The remaining 2,857 homes to be delivered following the 6,225 dwellings to date (940 net completions, 3,965 existing planning permissions and additional 1320 windfall allowance as of 31.03.2023) 179 dwellings per annum over the remainder of the plan period based on the proposed phasing of the housing requirement set out in Policy S2.

The latest Five-Year Housing Land Supply Statement (2022/23-2027/28) confirms that although there is a total of 1,512 (1096 with detailed planning permission and 416 with outline planning permission) new homes on large sites with planning permission, only 377 (or 25%) of these are completed.

It is unclear how the proposed sites being considered for allocation in the Local Plan will assist in delivering the identified housing requirement in the timescales envisaged. This is important, especially when considering the requirements of paragraph 60 of the NPPF which makes it clear that it is important that a sufficient amount and variety of land can come forward where it is needed to assist with the Governments objective of significantly boosting the supply of new homes.

The EHDC Land Availability Assessment 'LAA' 2023 indicates the majority of the large, strategic sites will not start providing completions until the latter end of the proposed plan period (6-10 years) and some will not be fully complete until next plan period (11-15 years). It is pertinent to note that in order to have a robust five-year housing land supply, in addition

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to focusing growth within or adjacent to the principal settlements of the district, the Council should look to all tier settlements in the hierarchy to deliver homes through a range of small, medium, and strategic sites.

Housing Strategy (Policy HI)

We support the expansion of the settlement boundary for Medstead (a Tier 4 settlement). Policy HI sets out that 100 new homes will be provided within Tier 4 and 5 settlements. Growth in such settlements is strongly encouraged, however, we believe that this figure should be increased, particularly if not all allocations not come forward in the timeframe envisaged or the or the capacity of the larger sites are reduced. A reduction in capacity on the sites may be likely due to the recent introduction of Biodiversity Net Gain (BNG).

Site Allocations

Figure 12.1 of the DLP sets out the total number of homes that would be delivered by allocations in the DLP and breaks this down to how many per settlement. As BNG is a now a mandatory requirement for all development in England these figures may need to be checked and reviewed. If BNG is to be provided on-site, it would likely impact on the net to gross ratio of development, particularly for smaller sites. There may be a need to reduce housing density to accommodate for habitat enhancements. A precautionary approach in terms of the interpretation of the potential housing capacity figures put forward for allocated sites should therefore be taken.

North Area: Remaining Settlements and Site Proposals

Figure 12.29 Current Planning Applications and Proposed Allocations - Medstead

Further expansion to include EHDC Land Availability Assessment 'LAA' site 'Land at Paice Lane' (site reference LAA/MED-019) would be encouraged alongside the proposed expansion to the south west of Wield Road, land to the south of the village (incorporating Land r/o Junipers MDS1) and the further extension of the SPB to east of the Village, along Hussle Lane/Abbey Road.

Our client owns 'Land at Paice Lane, Medstead' which is available and suitable to provide residential development of up to 30 dwellings. The site was submitted in response to the 2018 call for sites and is included in the EHDC LAA 2023.

Being an outlier field from the main farm of the proposer it is not well positioned and leads to functional inefficiencies in terms of agricultural practice. The proposed site backs onto other residences, and as the site is partly framed by hedging, the combination of the two factors would ensure that any development would not be damaging to the wider countryside.

The proposed site could provide an opportunity to provide a total of between 10-30 dwellings to maintain the current density of housing within the immediate surroundings. There is a

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reasonable access onto Paice Lane. There are no known constraints which would prevent the development of the land and the land is immediately available for development.

The site could also accommodate a proportion of the 15 houses proposed for Medstead (figure 12.1) if the density of development for MDSI is reduced as a result of the need to accommodate on-site BNG.

It is considered that the proposed spatial strategy relies too heavily on the provision of larger site allocations for housing provision which the Council (as well as the site promoters) have acknowledged are unlikely to deliver new homes until later in the plan period, when the need is now. Plans need to be prepared positively in accordance with paragraph 16 of the NPPF and at present, I do not believe this is the case with the EHDC Draft Local Plan 2021-2040 due to the over reliance on strategy sites.

The spatial strategy could be improved by making a number of smaller site allocations in accordance with paragraph 70 of the NPPF which would provide a more flexible and responsive housing land supply and deliver new homes earlier in the plan period to meet the current national need for new housing.

The total number of homes per settlement that could be delivered, through the suggested site allocations, should now be adjusted, to reflect the mandatory requirement for BNG. Particularly for sites that will provide on-site BNG.

In light of the above, it is considered that 'Land at Paice Lane' should also be allocated for development and included in the SPB for Medstead.

SPP
March 2024

From: [REDACTED]
Sent: 08 March 2024 14:56
To: [EHDC - Local Plan; PlanningInfo](#)
Cc: [REDACTED]
Subject: Southern Planning obo The Old Farm', No. 76 Wellhouse Road - Representations on the Draft East Hampshire Local Plan (2021-2040) - The Old Farm', No. 76 Wellhouse Road
Attachments: [Representations document 2024.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

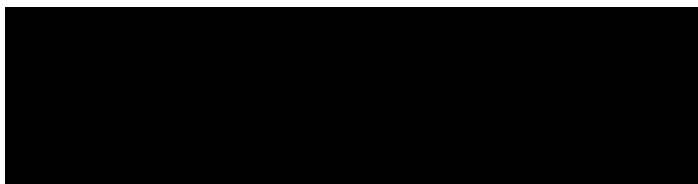
Please find attached a and this document covers detailed comments in respect of the following policies and sections of the draft plan:

- Spatial Strategy (Policy S2) Settlement Hierarchy
- The draft policies maps
- The Interim settlement policy boundary review 2024

Please can you confirm receipt and that this document will be taken into consideration?

Many thanks

Regards



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REPRESENTATIONS ON
THE EAST HAMPSHIRE DISTRICT
COUNCIL DRAFT LOCAL PLAN 2021-2040



Client: [REDACTED]

Date: March 2024.

Ref: EH/264/1/ID.

Southern Planning Practice Ltd

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4.0 COMMENTS ON THE DRAFT LOCAL PLAN 2021-2040	8
5.0 CONCLUSION	15

1.0 INTRODUCTION

- 1.1 These representations have been prepared by Southern Planning Practice Ltd on behalf of [REDACTED] who himself is acting on behalf of the landowner. This is for land to the north of 'The Old Farm', No. 76 Wellhouse Road, Beech in response to the current consultation on the Draft East Hampshire Local Plan 2021 – 2040 (hereinafter referred to as the DLP).
- 1.2 The land is considered suitable for inclusion in the revised Settlement Policy Boundary (SPB), subject of the current public consultation. **We therefore object** to the revised SPB for Beech as shown in the draft policies maps.

2.0 SITE DESCRIPTION

- 2.1 The objection to the DLP relates to land belonging to 'The Old Farm', No. 76 Wellhouse Road. The site is currently designated as countryside land, adjacent but, outside the revised SPB for the settlement of Beech.
- 2.2 The site measures 1.23 acres (0.5 ha) and currently consists of 17.4 x 35.4m (616m²) of tarmac/hard surface which forms a private tennis court. The tennis court is surrounded by a 2.75m high fence. The site is regularly maintained.
- 2.3 No. 76 Wellhouse Road is a grade II Listed Building to the north west of the site, which previously served as garden land associated with this property. It is separated from the garden to the property by boundary planting. However, should there be no allocation, the hedge could be opened up to provide access to the tennis court and garden.
- 2.4 Access to the site is via a single lane track, which also serves a bridleway and provides vehicular access to 78 Wellhouse Road. The site slopes upwardly from front to back in a south-north orientation.

Planning History

- 2.5 The historic OS map from 1957 shows the site as one large plot at the easter end of Wellhouse Road. Over time the site was subdivided into two houses (74 and 76 Wellhouse Road).



Extract from the 1957 OS map with site highlighted in yellow.

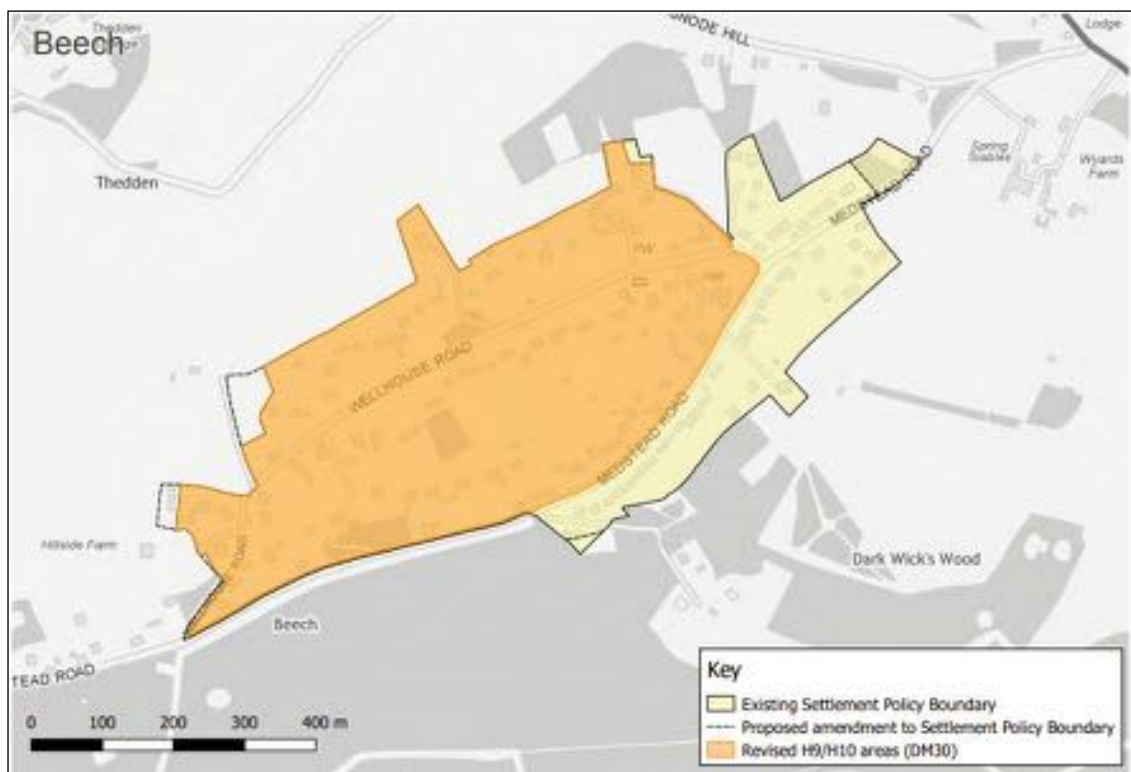
- 2.6** In 1988 planning permission was granted on the mid-eastern part of the site for a tennis court ref 30110 *Erection of a tennis court and surrounding 2.75m high surrounding fence* and was permitted on 28/04/1988.
- 2.7** In 2018, following the refusal of application 56613 for *two single storey dwellings with associated garaging, access and landscaping following removal of hard surface/tarmac tennis court*, an appeal (ref APP/M1710/W/18/3204714) was dismissed solely for the reason of the site being outside the SPB, even though at the time it was identified for inclusion within the SPB for Beech.
- 2.8** In the appeal decision, the inspector indicated that the correct way to get the site allocated was through the local plan process:
- “With regard to the matter of whether this application is premature, Policy CP10 refers to a process by which sites can be put forward for consideration”.*
- 2.9** Following this, application 56613/001 for a *Single storey dwelling with associated garaging and landscaping, which will utilise the existing site access, and to create a new access onto the vacant land to the north of the proposed dwelling plot following demolition of an existing hard surface* was also refused in 2018.

2.10 The reasons for refusal cited the site being outside the SPB and access (access was not a reason for the refusal on the two-dwelling appeal scheme ref APP/M1710/W/18/3204714).

3.0 POLICY BACKGROUND

Draft local plan 2017-2036 (Regulation 18) Consultation 2019

3.1 The Draft Local Plan 2017-2036 (policies map) included land at 'The Old Farm', No. 76 Wellhouse Road within the SPB for Beech:



Settlement Policy Boundary Review: Interim Methodology Paper (2018)

3.2 The evidence base for the Draft local plan 2017-2036 (Regulation 18) Consultation 2019 included the Settlement Policy Boundary Review: Interim Methodology Paper (2018) and the proposed changes to the SPB for Beech were show as below:



Extract from Draft Local Plan 2017-2036 (policies map)

3.3 In this paper, the comments on the proposed SPB for Beech were as follows:

Map Ref	Location / Description	Criteria / Principle	Consideration / Recommendation	Action	Evidence
1	Medstead Road	1	Where boundaries run along road they should be drawn along the edge closest to the settlement.	Redraw boundary along the opposite side of the road.	Aerial, Mapping, Site Visit
2	Land adjacent to 24 Medstead Road	3b, 4	20 Medstead Road is physically and visually detached from the remainder of the settlement. A large proportion of the land is covered by an area Tree Preservation Order.	Redraw boundary to exclude 20 Medstead Road and woodland.	Aerial, Mapping, Site Visit
3	22 Wellhouse Road	3c	Boundary cuts through garden of 22 Wellhouse Road. The curtilage of the property is closely related to the character of the countryside than built form and therefore the boundary should be defined around the built form.	Redraw boundary to exclude garden that relates to the countryside.	Aerial, Mapping
4	70 Wellhouse Road	1, 2b	Boundary cuts through garden of 70 Wellhouse Road. The curtilage of the property is closely related to the character of the built form and has enclosing features.	Redraw boundary to include garden along defined feature.	Aerial, Mapping
5	90 Wellhouse Road	1, 2a	New property on Wellhouse Road is physically and visually attached to the existing urban area.	Redraw boundary to include property along defined feature.	Aerial, Mapping, Site Visit
6	96 Wellhouse Road	1, 2b	Boundary cuts through garden of 96 Wellhouse Road. The curtilage of the property is closely related to the character of the built form and has enclosing features.	Redraw boundary to include garden along defined feature.	Aerial, Mapping, Site Visit
7	Corner of Medstead Road and Wellhouse Road	1	Where boundaries run along road they should be drawn along the edge closest to the settlement.	Redraw boundary along the opposite side of the road.	Aerial, Mapping, Site Visit
8	Medstead Road	1	Where boundaries run along road they should be drawn along the edge closest to the settlement.	Redraw boundary along the opposite side of the road.	Aerial, Mapping, Site Visit

Extract from the Settlement Policy Boundary Review: Interim Methodology Paper 2018

- 3.4 The considerations/recommendation in relation to Map Ref 4, incorrectly identified the site as relating to No. 70 Wellhouse Road and however it is noted that the boundary line cut through the middle of the garden and the action taken was to re-draw the SPB to include all the land at 'The Old Farm', No. 76 Wellhouse Road.

4.0 Comments on the Draft Local Plan 2021-2040

Spatial Strategy (Policy S2) Settlement Hierarchy

- 4.1 Policy S2 of the DLP S2 sets out the revised and updated settlement hierarchy informed by a re-assessment of the existing hierarchy. Paragraph SI.3 (the reference could be a typographical error as it does not follow on from the previous paragraph numbered S2.2) of the policy wording sets out how the settlements identified have a Settlement Policy Boundary (SPB) and how these have been reviewed, as identified on the Draft Policies Map.
- 4.2 Our client **objects** to the omission of land at ‘The Old Farm’, No. 76 Wellhouse Road which formed part of the previously proposed SPB for Beech in the latest review of the SPB for Beech.
- 4.3 The reason for the omission is indicated in Appendix A to the Interim settlement policy boundary review 2024.

Appendix A: Regulation 18 Consultation Responses

The following comments were made in relation to the Regulation 18 consultation document, supporting Policies Maps, and Settlement Policy Boundary Review: Interim Methodology Paper. Those responses that were clearly in regard to omission sites, do not feature in this table and have been considered more widely as part of the emerging Local Plan process.

ID	Comments	Council Response
23754	Page 98 (Map 4) of the Settlement Policy Boundary: Interim Methodology Paper should relate to 76 Wellhouse Road not Number 70. Also the land proposed to be included in the amended SPB no longer forms part of the garden or curtilage of the property.	Comment noted - Remove area from proposed SPB as land no longer forms part of the curtilage to 76 Wellhouse Road.

Extract from Interim settlement policy boundary review 2024.

- 4.4 Although the land is not in the ownership of 76 Wellhouse Road there is still a connection between the two pieces of land in the form of a bridge across the ditch (see photographs

below). It is understood that the water supply for both 74 and 76 crosses the land. This is to provide access to the land and the tennis court and the land for maintenance. It is also understood that the water supply for both 74 and 76 crosses the land.



4.5 This has been the situation for many years and has not changed since the sale of the house in 2017. The ecology plan submitted with the 2017 application shows that the majority of the land was lawn (yellow colouring below)



4.6

- 4.7 It is understood that this was the reason for the inclusion within the settlement policy boundary in 2018 (on the previous local plan) and the situation has not changed. It is argued that the site could still be considered to be curtilage and therefore should not have been removed.
- 4.8 Notwithstanding this the site has been assessed against the methodology as set out in the Interim settlement policy boundary review 2024 and it is argued that the site should be included in the SPB for the following reasons;

Principle I

The boundary will be defined tightly around the built form of settlements and where possible will follow defined features such as walls, fences, hedgerows, roads, canals and woodland.

- 4.9 The tennis court is considered to amount to previously developed land immediately adjacent to an access track which leads from Wellhouse Road. The access track defines the extents of the west boundary of the site and, in part, the existing SPB line which extends from Wellhouse Road over part of 76 Wellhouse Road. It would therefore seem logical to follow this feature up to the north west corner of the site, around to the east to meet the SPB boundary at the north west corner of the garden to No 72 Wellhouse Road.
- 4.10 Until recently the land was maintained as garden and the tennis court was regularly in use. It was only when 76 Wellhouse Road was sold that the hedge was erected. The hedge could easily be removed and is not considered a defined feature.
- 4.11 The following is an extract taken from the appellant appeal statement submitted as part of the appeal documentation for APP/M1710/W/18/3204714: -

“The Applicant met with EHDC case officer, Matthew Harding on 18th January 2018 to discuss the possibility of erecting a single dwelling instead of the two (as proposed in this appealed application). The case officer responded in EHDC letter, dated 2nd February 2018 (See Appendix 4, EHDC Pre-App letter 56613/999, Mattew Harding)

In the Pre-App letter, the case officer confirms that “the tennis court is considered to amount to previously developed land where the NPPF (Paragraph 17) encourages the effective use of land by reusing land that has already been previously developed (Brownfield Land), provided that it is not of high environmental value. The land in question is not considered to be of high environmental value” The use of the previously developed land, as encouraged by the NPPF, does weigh in favour of the proposal”.

4.12 The site is therefore considered to be ‘Brownfield’ land by both EHDC and the owner.

4.13 The site is located immediately adjacent to (and touches) the SPB, rather than countryside or ‘Greenfield’ land location detached from or outside a SPB. Due to its position in relation to the existing SPB, it would provide logical infill within the natural boundaries of the SPB that exist, it is therefore rational to include the site within the settlement boundary.

Principle 2

Settlement boundaries will include:

b) The curtilages of buildings which are contained, closely relate to the character of the built form, have enclosing features, and are separated from the open countryside.

d) Small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area, taking account of any environmental development constraints.

e) Other sites that are surrounded by existing development that are physically, functionally and visually related to the existing urban area, taking account of any environmental development constraints.

4.14 Paragraph 89 of the NPPF states that: -

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist”.

4.15 The prevailing pattern of development along Wellhouse Road is generally linear in nature and there are examples of development at depth that do not conform full conforming to the general linear pattern. For example, number 72.

4.16 In both previous planning applications, it was confirmed by the case office that development on this site would have no detrimental impact on the character of the area. Below are extracts from delegated officer reports on applications 56613 and 56613/001:

Application 56613:

“As such, the erection of two single storey dwellings on the site, for reasons of their scale, plot size, nature of the surrounding built form, existing access track and sympathetic approach to the site’s topography, are considered to be complimentary to the surrounding character of the area. As such, the proposed development is not considered to have an adverse impact on the character of the area in accordance with Policy CP29 of the Local Plan: Joint Core Strategy and the advice contained within the NPPF”.

Application 56613/001:

“As such, the proposed development is considered to be complimentary to the surrounding character of the area and be of good design. The development, therefore, is in accordance with Policy CP29 of the Local Plan: Joint Core Strategy, Policies BPC06, BPC07 and BPC08, together with the advice contained within the NPPF”.

4.17 The site would therefore meet the criteria, in particular criteria b), d) and e) of Principle 2 for inclusion.

Principle 3

Settlement boundaries will exclude:

b) Isolated development which is physically or visually detached from the settlement.

c) Sections of large curtilages of buildings (including gardens) which relate more to the character of the countryside than the built form. Where possible and to

maintain continuity, exceptionally long gardens will follow the boundaries of adjacent properties with smaller curtilages.

- 4.18 The site is not physically or visually detached from the rest of the settlement of Beech and the site is not considered to have a countryside character given the presence of the tennis court. For reasons set out above, in paragraphs 4.9-4.12, the site would not therefore meet the criteria, in particular b) and c), of Principle 3 for exclusion.

Principle 4

Settlement boundaries do not need to be continuous.

- 4.19 It is noted that it may be appropriate to provide two or more separate elements of a SPB if deemed appropriate to nature and form of a settlement. This principle is not considered to apply to land at 'The Old Farm', No. 76 Wellhouse Road and it is highlighted that the inclusion would allow and form part of a continuous SPB.

Other comments

- 4.20 Under the 'Anomalies' section it states that "*The decision to include or exclude must be clearly noted and justified in the assessment for that specific settlement*". It is felt that insufficient justification has been given for the decision to exclude land at 'The Old Farm', No. 76 Wellhouse Road since its inclusion in the SPB for Beech in the Draft Local Plan 2017-2036.

5.0 CONCLUSION

- 5.1 There is a typographical error in the wording of Policy S2. The SPB review for Beech, as identified on the Draft Policies Map, is considered to be flawed.
- 5.2 The land at 'The Old Farm', No. 76 Wellhouse Road, is considered suitable for inclusion in the revised Settlement Policy Boundary (SPB) for Beech as it meets the principles for inclusion as assessed against the methodology in the Interim settlement policy boundary review 2024.
- 5.3 Insufficient justification has been given for the decision to exclude land at 'The Old Farm', No. 76 Wellhouse Road since its inclusion in the SPB for Beech in the Draft Local Plan 2017-2036.

From: [REDACTED]
Sent: 01 March 2024 11:50
To: [EHDC - Local Plan](#)
Subject: Ruth Duffin - Housing needs
Attachments: [Title HP460347.docx](#)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Awaiting Response, Consultation Responses, LAA, [REDACTED]

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

Please find attached for your consideration.

Yours sincerely

[REDACTED]

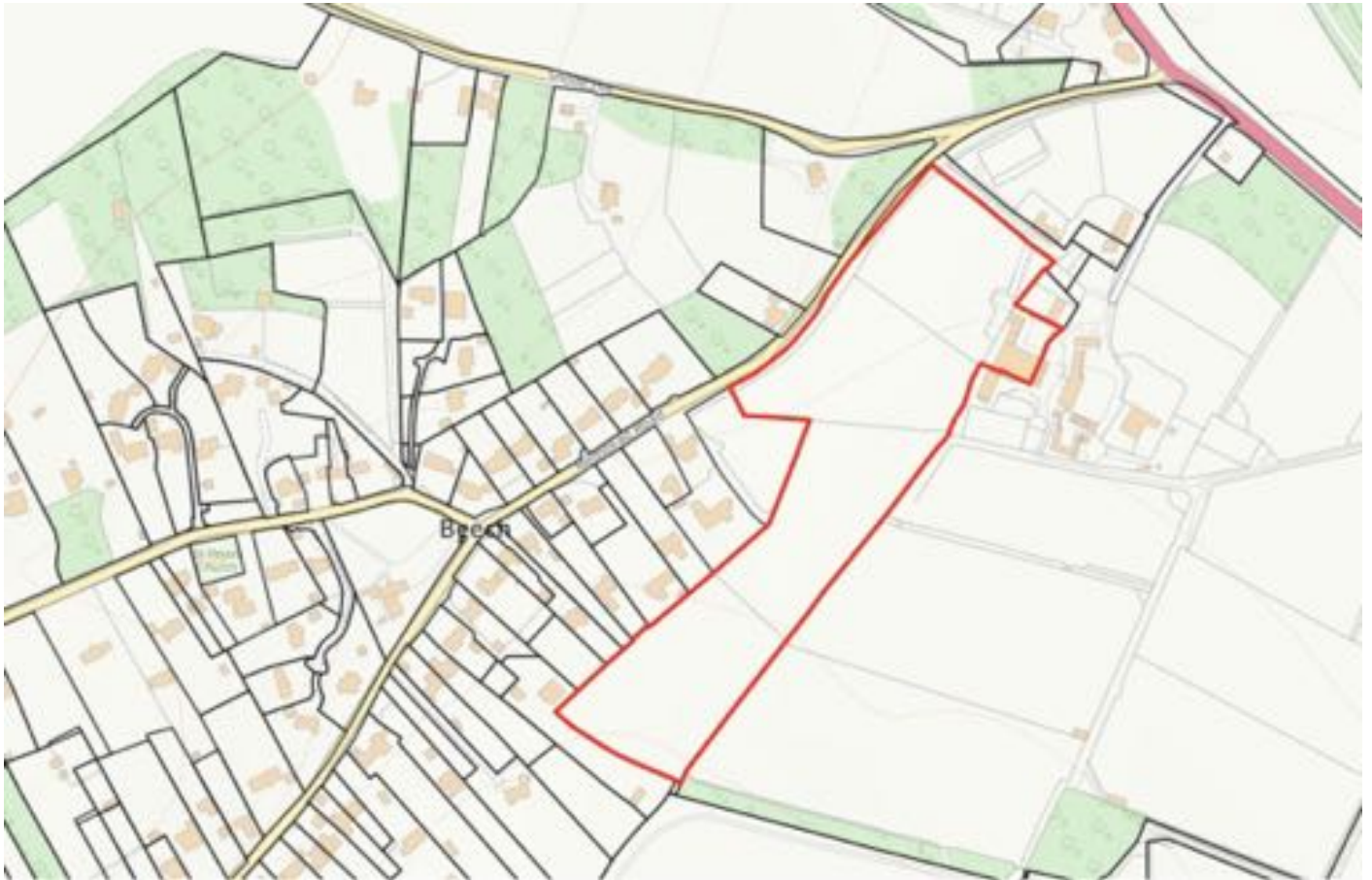
Land at Spring Stables, Beech

Title HP460347

I am the owner of the land at Spring Stables, Beech (Title HP460347), which received a positive LAA response in November 2023. The LAA reference for my site is LAA/BEE-009.

It had previously been identified that a smaller section of the site had been put forward for consideration, but I would like to confirm that the entire site is available for redevelopment.

I am aware that the Housing Background Paper issued in January 2024 (paragraph 4.22) refers to a need of 830 housing units with support (sheltered / retirement living) and around 760 housing units with extra care, together with additional nursing care bed spaces. I believe that my land creates a fantastic opportunity to assist with this shortfall, together with additional housing to meet the specific demographic local needs.



From: [REDACTED]
Sent: 06 March 2024 09:41
To: [EHDC - Local Plan](#)
Cc: [REDACTED]
Subject: Stantec - Representations to Draft East Hampshire Local Plan 2021-2040 - Regulation 18 Consultation
Attachments: [34304 A3 DM SS PN EHDC Reprs o.b.o Audley 060324 FULL.pdf](#)

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

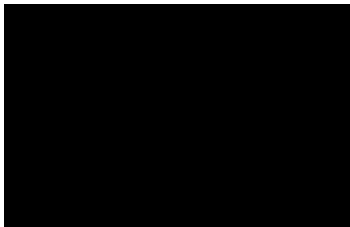
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Good morning,

Please find attached our representations to the draft East Hampshire Local Plan 2021-2040 Regulation 18 Consultation on behalf of Audley Group.

I would be grateful if you could please confirm receipt of this email and the attached letter and accompanying materials.

Kind regards,



Stantec
7 Soho Square
London W1D 3QB



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06 March 2024

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

Dear Sir/Madam,

EAST HAMPSHIRE DRAFT LOCAL PLAN 2021-2040 REGULATION 18 CONSULTATION

We write on behalf of Audley Group (“Audley”) to make representations in respect of the draft East Hampshire Local Plan 2021-2040 Regulation 18 Consultation (January – March 2024). These representations build on our previous submission (dated 13 January 2023) to the Issues and Priorities Regulation 18 consultation in January 2023.

Audley is an experienced and well-respected developer, owner, and operator of Integrated Retirement Communities (IRCs) around the UK. Audley’s IRCs are an alternative to the traditional care home and provide an opportunity for older people to live more independently in their own accommodation while having access to 24-hour on-site care and a range of shared communal facilities including bar/bistro, restaurant, hydrotherapy pool, library, treatment rooms, and a gym.

These representations broadly welcome the draft Local Plan strategy which includes a targeted policy in relation to specialist and older peoples housing. However, we believe the Council’s draft Policy can be strengthened to ensure a more effective approach towards delivering specialist housing for older people and which acknowledges the increasing urgency to do so, as set out within National Planning Policy.

We consider that the draft Local Plan in its current form places an over reliance on the delivery of older persons and other specialist housing via ‘ad hoc’ proposals, which is less effective than identifying and allocating sites to expressly deliver retirement living facilities, as evidenced within this representation. To rectify this, a greater number of specific sites for housing for older people should be expressly allocated.

National Planning Policy Context

England’s population is ageing. The NPPG (Paragraph: 001 Reference ID: 63-001-20190626) notes that the need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged over 85; by mid-2041 this is projected to double to 3.2 million.

The growing need for older persons accommodation means that Local Planning Authorities should plan specifically for the future development of such provision. Paragraph 63 of the NPPF (2023) requires that, in the context of establishing need, the size, type and tenure of housing needed for older people (including those who require retirement housing, housing-with-care and care homes) is assessed and reflected in planning policies. This wording has been strengthened in order to specifically differentiate between retirement housing, housing-with-care and care homes, as opposed to a generic reference to ‘older people’ in previous iterations.

The NPPG requires plan-making authorities to set out clear policies to address the housing needs of groups with particular needs such as older and disabled people; to consider and seek different types of housing that these groups are likely to require; as well as providing indicative figures for the number of units of specialist housing for older people needed across the plan area throughout the plan period (Paragraph: 006 Reference ID: 63-006-20190626).

The NPPG also recognises that allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations (Paragraph: 013 Reference ID: 63-013-20190626). The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to facilities such as local amenities and health services.

The 'Advice on planning for the housing needs of different groups' paper from Department for Levelling Up, Housing and Communities update May 2021 is also clear that strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

- the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);
- the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and
- the anticipated deliverability of different forms of provision, having regard to viability.

This is also in line with the recommendations of The Mayhew Review (2022) which urges a significant expansion in the number of IRCs built each year alongside planning reforms which put retirement housing on a level playing field with other building developments.

The Need for Specialist Housing within East Hampshire

The Council's Housing and Economic Needs Assessment (HEDNA) (2022) identified a district wide housing need of 632 dwellings per annum based on the application of the Standard Method at that time. As set out within the Housing Background Paper (2024) the standard method housing need can only be calculated for the whole district of East Hampshire (i.e. including the South Downs National Park) and not just for the Local Plan Area, East Hampshire is therefore permitted by national planning guidance to calculate its own housing need figure using an alternative method.

However, planning guidance stresses that any other method should only be used in exceptional circumstances. It says *"Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination"*.

The Technical Note: Testing the Standard Method Housing Need for East Hampshire however, recommended that the standard method figure should be used as the appropriate starting point for plan-making, and this was again reinforced by the subsequent update (September 2023) which found *"if anything the data would point to a need higher rather than lower than the Standard Method"* (p.12).

Taking revised household growth data and more recent affordability ratio data into account, the Updated Technical Note (2024) identifies a district wide housing need of 578 dwellings per annum of which 464 per annum would be required within the Local Plan Area.

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

There is a clear acknowledgement of the ageing population in the District. When looking ahead over the plan period in terms of the proportion of older people (over 65 year olds) this increases by 36%. Data from the HEDNA identifies a need for about 830 housing units with support (sheltered/retirement housing) and around 760 housing units with care (extra care) together with additional nursing care bedspaces over the plan period.

Whilst the Housing Background Paper (2024) makes reference to a small selection of pipeline schemes which, if delivered, will contribute towards the supply of older peoples housing, it also acknowledges that the Local Plan Area faces a “*demographic challenge in the coming decades, with a substantial rise forecast in its older population and whilst some of the housing needs of older people will in future continue to be met through the provision of general needs accommodation (e.g. mainstream housing, bungalows, step free apartments). There will be an increasing need for specialist accommodation types to cater for this demographic change*’ (paragraph 4.27) (our emphasis).

Draft Local Plan Policy H5

Consistent with National Policy, the Draft Local Plan recognises the need to ensure that the housing needs for all people are considered and provided for and includes draft Policy H5 which looks to address older person and specialist housing needs specifically.

The supporting text to draft Policy H5 echoes the text within the Housing Background Paper and acknowledges that the Local Plan Area faces a demographic challenge in the coming decades, with a substantial rise forecast in its older population, with an increasing need for specialist accommodation types to cater for this demographic change (Paragraph 4.27).

Whilst the draft policy rightly seeks to direct provision towards sites within settlement boundaries, we support the provision under part b) to allow development to come forward on sites within the countryside, albeit we would welcome greater flexibility in terms of the listed criteria in order to support delivery in appropriate locations. This is important having regard to the barriers to development outlined in more detail below.

Whilst a targeted policy dealing with specialist and older peoples housing is welcomed, in its current form draft Policy H5 is overly reliant on delivery via ‘ad hoc’ proposals, which is less effective than through the dedicated development of retirement living facilities, as evidenced within this representation. We therefore urge the Council to formally allocate additional land for C2 development (to include a distinction between the needs for retirement housing, housing with care and care homes) in the draft Local Plan.

This is also important as specialist home providers such as Audley are less able to compete with conventional housebuilders to deliver retirement housing with care on sites allocated for general housing development, as the development costs and operational models are fundamentally different (as acknowledged at paragraph 8.57 of the HEDNA). This is a key reason as to why the NPPF requires identification of the number of homes needed to meet different groups in the community.

The remainder of these representations sets out the justification for specifically allocating sites to accommodate older persons accommodation and again puts forward Grayshott Hall as a site allocation opportunity for the Council to consider further. The potential site allocation is shown on the Site Location Plan provided as **Appendix 1**.

Addressing Barriers to Development

There are a number of key operational requirements and geographical constraints which can make it difficult to identify suitable sites and to deliver residential care developments. These barriers can include a lack of suitable land or existing buildings within the established settlement hierarchy; the lack of ability to compete financially with conventional housebuilders that can build at higher densities in acquiring land; restrictions on the amount of development that can be permitted adjacent to, or outside of the settlement hierarchy; and the requirement for large sums of financial contributions which can adversely affect the financial viability of projects. These barriers are explored in further detail below.

The Supply of Land

The lack of suitable land or existing buildings within the established settlement hierarchy make it difficult to secure suitable sites for retirement living. Restrictive geographical constraints, such as the SDNP, compound this issue and can force developers to provide sub-standard and inflexible accommodation housed within converted dwellings or apartment blocks which would be better suited for open market housing. We would therefore urge the Council to take a proactive approach in allocating sufficient land to meet current and future demands in a sustainable way.

Audley Group does not currently operate any IRCs within the District, however it has identified a growing demand for such accommodation within the area and as set out in more detail below, has identified Grayshott Hall as a prospective site which has the potential to accommodate c.166 units as part of an IRC development. This offers potential to contribute significantly towards meeting identified need for this category of specialist housing, notwithstanding its location within the 400m buffer zone of the Wealden Heaths SPA (as considered in more detail below).

Ensuring a flexible approach to location

As noted by The Mayhew Review – Future Proofing Retirement Living (November 2022), purpose-built retirement housing (i.e. IRCs) offer substantial benefits and are more effective in providing optimal care and living standards. A more integrated retirement community with domiciliary care provided can help with the cost and complexity of care coordination. The Report therefore promotes a bigger industry-wide building programme of IRCs - up to 50,000 new units a year.

Audley's IRC format has been very successful in several locations around the UK and they presently operate 19 IRC developments within their portfolio. The combination of independent living with communal amenity areas and services on-site creates its own sense of community. Such facilities are not just provided for convenience, but are provided in a way which allows trained-care staff to be on hand if required, and therefore form an important part of the care package.

This also means that, unlike open market housing, it can sustain itself with less reliance on the wider settlement hierarchy. Audley IRCs can therefore complement rural areas and can work well on challenging sites such as those which include listed buildings, those within SPA buffer zones, or sites which may not be suitable or viable for other forms of development.

It is also relevant to note the Inspector's comments within the recent Bottisham appeal decision (Ref: APP/V0510/W/23/3324141) dated 16 February 2024. In allowing the appeal, the Inspector clearly acknowledged a number of benefits associated with an IRC format, noting at paragraph 33 that the IRC *"would support improved physical health as well as psychological and social well-being for its residents, including reducing the feeling of loneliness as well as helping couples remain together when one partner's needs require additional care"*. The inspector also accepted at paragraph 51 that *"the integrated nature of IRCs means that on-site leisure and other facilities are a component part of the offering. As a result,*

they generally need to provide a minimum of 100 units to make them viable". In our experience, this is a quantum of development unlikely to be met through ad-hoc permissions and therefore requires a more focussed, proactive approach through the identification of specific allocations.

It is also relevant to note that within the Bottisham case, the Inspector found the Local Plan to be inadequate in supporting the delivery of Extra Care housing by virtue of there being no sites allocated specifically for C2 use and there being a *'distinct lack of robust local planning policies and site allocations to support this form of housing'* (paragraph 39). The Inspector goes on to afford *'very substantial weight'* to the provision of extra care housing in the context of deficient local policy support and significant market constraints affecting delivery (in addition to there being no alternative sites) which lead the Inspector to conclude that *'the identified acute extra care housing needs are unlikely to be realised over the plan period'* (paragraph 83).

Taking the above into consideration provides strong justification for a need for the Council to **proactively plan** to meet identified demand through the allocation of land within the District to deliver purpose built IRCs, as opposed to relying on the present generic capture mechanism currently set out within draft Policy H5 which is considered woefully inadequate.

Site Suitability

As noted above, Audley have identified a prospective site in Grayshott which has the potential to accommodate c.166 units which would contribute significantly towards meeting the evidence-based identified need for this category of specialist housing.

Grayshott Hall is located off Headley Road, c.1.5km to the west of Grayshott Village and c.3km to the west of Hindhead. Grayshott Hall itself is a nineteenth century manor house set in extensive gardens and grounds. The Council consider the building to be a non-designated heritage asset.

The site has been considered in the land availability assessment as site ref: LAA/GRY-007. Within the assessment it has been discounted for further consideration on the basis of its proximity to the Wealden Heaths SPA and for no other apparent reason.

Since 1965 the Site has been used as a health and leisure spa facility. However, the impact of Covid-19 and forced closures during successive lockdowns, led to the permanent closure of the facility towards the end of 2020. Since then, the Site has remained vacant.

The previously developed Site is located just beyond the edge of the settlement boundary, within the countryside and within the settlement gap between Headley Down and Grayshott. The Wealden Heaths SPA is located directly to the south of the Site, which is designated as an internationally important site for ground nesting birds. Ludshott Common SSSI is also located to the south and we are aware that East Hampshire is a nutrient neutral authority. Pre-application advice has been sought from Natural England who accepted in principle, the possibility of accommodating an IRC (C2 use) within proximity to the SPA, given the inherent differences of this type of accommodation to general housing (C3 use). This was based on evidence provided across Audley's extensive estate. Accordingly, the location of the site within the SPA buffer zone should not in itself constitute a reason for discounting the Site from further consideration as appears to have been the case based on our review of the Land Availability Assessment (2023).

We do not believe that there are any technical constraints that would preclude the Site coming forward for development. The Site is located within Flood Zone 1 (and is therefore at low risk of fluvial flooding) and is not located within the Green Belt or an AONB. Whilst there is a group of trees covered by a TPO on the easternmost corner of the Site, these could be retained in any redevelopment scheme.

Further, and with the exception of Grayshott Hall, which is considered to be a building of some merit, many of the existing buildings on the Site are unsightly and detract from the character of Grayshott Hall and open park land beyond. There is a clear opportunity for the considerate redevelopment of these buildings to deliver an improvement in terms of the overall appearance of the Site and the relationship with Grayshott Hall as the principal building.

The Site therefore offers potential to contribute significantly towards meeting a recognised need to accommodate an increasing ageing population, and the draft Local Plan notes the importance of ensuring that provision is suitably designed within an environment that provides an appropriate level of care, with the retirement village model in particular offering notable benefits. Such a model requires a critical mass and there are no other sites identified or allocated to deliver a retirement village within the District.

The care facilities, and support provided in an Audley Village also help to reduce hospital visits, bed-blocking, and dependency on the NHS. Research published by Aston University in 2015 has shown that people living in an Audley type development will spend an average of 1-2 days in hospital per year whereas the average for older people living in their own homes is 8-14 days. Audley also regularly enter into partnerships with local NHS trusts to provide transitional care and clinics, further relieving the pressure on the service.

Summary and Conclusion

Overall, Audley welcome the Council's intention to devise a strategy by which the new Local Plan seeks to meet the identified housing requirement of specialist groups (including older people) within East Hampshire and welcomes the opportunity to provide feedback on draft Policy H5.

However, as currently drafted Policy H5 does not go far enough to effectively plan to meet identified needs despite acknowledging that the District faces '*a demographic challenge in the coming decades, with a substantial rise forecast in its older population*' and whilst some of the housing needs of older people will in future continue to be met through the provision of general needs accommodation, there '*will be an increasing need for specialist accommodation types to cater for this demographic change*' (Paragraph 4.27) (our emphasis).

To not allocate specific sites within the draft Local Plan, would be to disregard the following:

- The NPPF (2023) paragraph 63 requires the need for housing for older people to be assessed (to include differentiation between retirement housing, housing-with-care and care homes) and reflected in planning policies.
- There is an established need within the District for housing for older as evidenced within the HEDNA (2022), and recognised within the Housing Background Paper (2024).
- As outlined within these representations, there are a number of barriers to delivery which would could be overcome by the Council clearly identifying, examining and allocating appropriate sites for IRC or other specialist accommodation developments which would provide much needed certainty in what can otherwise be a highly unpredictable planning framework.
- Grayshott Hall offers the potential to accommodate a high quality IRC development which would make an appropriate and valuable contribution towards meeting the District's needs for this type of specialist accommodation and we would therefore urge the Council to re-consider the Site in the context of a C2 use and having regard to Natural England's views in relation to the SPA.

We trust that these representations will be given due consideration and would welcome the opportunity to discuss them with the Council in more detail.

We look forward to receiving acknowledgement of this submission marked for the attention of Dan Melling or Susie Stephen at this office. We would also be grateful if you could keep us notified of the progress of the Local Plan and other emerging planning policy documents.

In the meantime, should you require any additional information please do not hesitate to contact us directly.

[Redacted]

DMelling

[Redacted]

[Redacted]

[Redacted]

[Redacted]

STANTEC UK LIMITED

Enc.

Appendix 1

Site Location

Grayshott Spa, Surrey



— Site Boundary

From: [REDACTED]
Sent: 08 March 2024 13:00
To: [EHDC - Local Plan](#)
Cc: [REDACTED]
Subject: Stantec obo Bloor Homes Limited - Regulation 18 Consultation - Draft Local Plan 2021-2040
Attachments: [3331008886 - Local Plan Reqs - March 2024.pdf](#)
[3331008886 Horndean Vision Document FINAL.pdf](#)

Follow Up Flag: Follow up
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Categories: Consultation Responses

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Please find attached representations on the Draft Local Plan 2021-2040 (Regulation 18) consultation on behalf of our client Bloor Homes Limited.

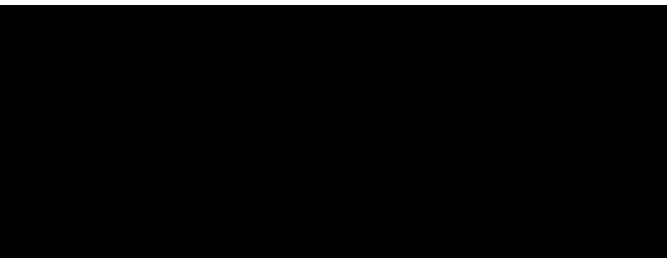
Attached to this email are the following documents:

- Representations prepared by Stantec including appendices; and
- Vision Document prepared by Stantec.

I would be grateful if you could confirm receipt of this email.

Best regards

[REDACTED]



The Blade
Abbey Square
Reading
RG1 3BE



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Land east of Horndean (Hazelton Farm)

Representations to Regulation 18 Draft Local Plan

On behalf of

The logo for BLOOR HOMES, consisting of the words "BLOOR HOMES" in a bold, sans-serif font with a registered trademark symbol, positioned above a dark blue rectangular box with a white wavy line underneath.

Project Ref: 333100886/A5/P1/RR/NPN Date: March 2023

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1 INTRODUCTION

- 1.1.1 These representations are submitted on behalf of Bloor Homes Limited (herein referred to as 'Bloor Homes') in response to the 'Regulation 18 – part 2' Draft Local Plan consultation document published by East Hampshire District Council (EHDC).
- 1.1.2 These representations relate to the Land East of Horndean (Hazelton Farm) (herein referred to as 'the Site') which is being promoted by Bloor Homes as a site suitable for development which is located on the edge of the settlement and within the administrative boundaries of East Hampshire with exception of the southernmost boundary which falls under the administrative boundary of Havant District Council. The Site abuts the outline planning permission (reference: 55562/005) to the north which was allocated through the current adopted plan (site reference: HN1).
- 1.1.3 These representations are accompanied by a Vision Document detailing the assessment of the land and Bloor Homes development proposals for the site. This represents a clear opportunity to deliver high quality new market and affordable homes on the edge of Horndean's settlement.
- 1.1.4 Bloor Homes wishes to engage positively with EHDC regarding the potential for the Site to be allocated within the Draft Local Plan. The opportunity to discuss the proposals further is welcomed as part of the Local Plan preparation, scheduled to be undertaken from now until 2025/2026.
- 1.1.5 Bloor Homes supports EHDC in preparing a new Local Plan for the district. In accordance with paragraph 33 of the National Planning Policy Framework (NPPF) (2022), policies in local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.
- 1.1.6 The representations demonstrate that the Site represents an opportunity for the sustainable growth of Horndean which will contribute to addressing housing need across the district.

2 LEGAL COMPLIANCE

2.1 Duty to Co-operate

- 2.1.1 Section 33A of the Planning and Compulsory Purchase Act 2004 require that local planning authorities engage constructively, actively and on an ongoing basis in any process by means of which activities associated with the preparation of development plan documents are undertaken so far as relating to strategic matters.
- 2.1.2 The latest NPPF states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, it is emphasised that joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere (Paragraph 26).
- 2.1.3 The Duty to Cooperate encourages collaboration between local authorities who share boundaries. The Levelling Up and Regeneration Act contained provisions to repeal the Duty to Cooperate. Government proposals have highlighted that it is anticipated an ‘alignment test’ will replace the Duty to Cooperate. Notwithstanding this and whilst it may be replaced in due course (there are no timescales for this in the Act itself), the existing Duty to Cooperate still applies to the plan making process and therefore remains a relevant consideration for the EHDC emerging Local Plan.
- 2.1.4 The latest version of the NPPF (2023) will apply in accordance with paragraph 230 as the preparation of the draft Plan will reach Regulation 19 after 19 March 2024. The draft Local Plan and its strategic policies will therefore be assessed in accordance with the legal and procedural requirements and whether they are sound. Plans are sound if they are positively prepared, justified, effective and consistent with national policy. These tests of soundness apply to the emerging EHDC draft Local Plan.
- 2.1.5 Bloor Homes welcomes the ongoing engagement with neighbouring authorities including the Statements of Common Ground which will serve as important evidence to demonstrate that the Duty to Co-operate has been fulfilled in the plan making process. The following Statements of Common Ground have been published between EHDC and neighbouring authorities:
- South Down National Park Authority (January 2024);
 - Waverley Borough Council (January 2024);
 - Basingstoke and Deane Borough Council (January 2024);
 - Winchester City Council (January 2024);
 - Chichester District Council (January 2024);
 - Hart District Council (January 2024); and
 - Partnership for South Hampshire (September 2023).
- 2.1.6 The South Down National Park Authority (SDNPA), which covers the area of the district inside the National Park and is currently undertaking a Local Plan Review. This is at a very early stage (evidence base gathering) and a draft plan for Regulation 18 consultation is anticipated for early 2025.
- 2.1.7 In this context, SDNPA highlight in the Statement of Common Ground (2024) that the HEDNA has calculated an unconstrained or “policy-off” housing need of 6,300 homes across the whole of the National Park between 2024 and 2042. This is equivalent to 350 dwelling per annum (dpa). Notwithstanding this, the SDNPA is currently at the very early evidence gathering stage of its Local Plan Review process. As such, the SDNPA is not able to confirm how much of the identified housing need will be met or apportioned across East Hampshire Area of the National Park. Despite this, EHDC is seeking to take the approach that based on the top-down output of 114 dpa, it is ‘estimated that 100 dpa will continue to be delivered over the extent of the plan

period leaving a residual 266 dwellings (14 dpa)' (para 7.8 of SoCG). It is therefore integral that a consistent approach is adopted as both EHDC and SDNPA progress with their emerging Local Plans.

- 2.1.8 The remaining local authority Statements of Common Ground listed above confirm that there is to be no unplanned housing need arising where assistance is being sought from EHDC or vice versa. However, there still remain a number of local authorities who border East Hampshire who have not prepared statements of common ground to clarify their position including Havant District. Havant District and the southern part of East Hampshire District are located within South Hampshire and PfSH boundary.
- 2.1.9 The Housing and Employment Development Needs Assessment (HEDNA) (2022) states that East Hampshire should be defined as a 'single market housing market area' (paragraph 1.8). It also states that 'the most significant interrelationships were identified with East Hampshire District, Waverley and Havant Boroughs' (paragraph 1.7). It is strongly disputed that it is appropriate to consider East Hampshire as a single housing market area, especially in the context of paragraph 1.7 which acknowledges the significant interrelationships between Havant and the southern parishes of East Hampshire. The south of the East Hampshire District is part of the Partnership for South Hampshire (PfSH) and therefore, this area in particular, should be regarded as forming part of the South Hampshire housing market area. Furthermore, attached to these representations is a technical report titled East Hampshire Housing Need Evidence Base Review (herein referred to as 'the HNEBR) prepared by Stantec and included at Appendix 1. This identifies that Havant has an identified shortfall of -2,603 homes (covering the period 2023-2036). This is a significant shortfall, and it is therefore appropriate that a proportion of this should be accommodated in Horndean as it is within the PfSH area and adjoins Waterlooville within Havant.
- 2.1.10 It will be imperative that as other local authorities progress with their emerging plans, including those authorities that are part of PfSH, EHDC will need to update and significantly increase housing delivery accordingly. This is discussed further in Section 6.

Methodology

- 2.1.11 The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) requires that an environmental assessment of plans and programmes, including Local Plans is carried out. The regulations require identification, description and evaluation of the likely significant effects on the environment of implementing the plan and of reasonable alternatives taking into account the objectives and the geographical scope of the plan (Article 12(2)). In addition, an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including the difficulties in compiling the required information is required (by Schedule 2 of the Regulations).
- 2.1.12 Paragraph 32 of the NPPF states that local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should include how the plan addresses relevant economic, social and environmental challenges and where possible, to avoid significant adverse impacts upon these objectives. Where this is not possible, suitable mitigation measure should be proposed.
- 2.1.13 It is noted that EHDC previously prepared a Sustainability Appraisal in 2018 alongside the draft local plan for consultation in February 2019. EHDC has taken the view that to ensure a broader range of issues and matters are considered to inform the emerging Local Plan, an Integrated Impact Assessment (IIA) has been prepared. This staged approach to consultation to include a wide range of matters is supported.
- 2.1.14 Appendix G of the IIA includes an assessment of the sites set out in the Land Availability Assessment (LAA) and seeks to provide an assessment of why these sites should not be brought forward in the draft Plan. This includes the Site at Hazelton Farm. A review of the assessment for the Site has been undertaken and a commentary attached to the findings and

scoring provided by EHDC. This is included at Appendix 2 and a summary of this is set out below.

- 2.1.15 A review of the scoring assessment has been undertaken. On a number of the objectives, it is considered that the Site scores more positively including Objectives 1, 3, 4, 5, 9 and 11. It is therefore concluded that the Site is suitable for development in the context of achieving the majority of these objectives as providing a neutral score and above.

3 VISION AND STRATEGIC OBJECTIVES

- 3.1.1 Bloor Homes support the principles of the proposed vision as set out on page 25 of the draft Plan which covers environmental, social and economic matters so as to look holistically at sustainable development. In particular, the objectives linked to sustainable levels of growth in providing a level of housing growth to meet future demand and deal with issues relating to affordability. Objective A1 should go further, however, to emphasise the importance of identifying sustainable sites to maintain a supply of housing to a high-quality design.
- 3.1.2 Indeed, the vision for the delivery of new homes to the Site presents an opportunity for the delivery of a substantial number of high-quality new homes, sustainably located on the edge of Horndean to come forward as balanced growth for the settlement. This is detailed further within Section 6 of these representations.
- 3.1.3 The strategic objectives identified in the draft Plan are also broadly supported albeit, it is considered that the plan period needs to be extended by one year (as explained below). This will allow for well-designed development in sustainable locations to be achievable and is key to meeting the draft Plan objectives. Bloor Homes supports a proactive approach to delivering development in EHDC which has a positive regard to balancing economic, environmental and social objectives as set out in the NPPF.
- 3.1.4 The NPPF states at paragraph 22 that ‘strategic policies should look ahead over a minimum 15-year period from adoption’. EHDC Local Development Scheme (LDS) currently targets the Regulation 19 consultation for July 2024 with the Plan targeted for submission in December 2024. It is anticipated that the Examination in Public will take place in January 2025 with the Inspector’s Report due by August 2025.
- 3.1.5 The NPPF states at paragraph 22 that ‘strategic policies should look ahead over a minimum 15-year period from adoption’. East Hampshire District Council Local Development Scheme (LDS) currently targets the Regulation 19 consultation for July 2024 with the Plan targeted for submission in December 2024. It is anticipated that the Examination in Public will take place in January 2025 with the Inspector’s Report due by August 2025. Adoption is targeted for September 2025. This timeframe does not allow for sufficient time. Assuming submission of the Plan will take place at the end of 2024, it is unlikely that the Examination will take place before Easter 2025 with proposed modifications anticipated for the Autumn. This has the potential, in reality, to extend in to early 2026 with adoption therefore likely to take place at the end of the 2025/2026 monitoring period. As such, the draft Plan need to extend the plan period to 2041.
- 3.1.6 It is therefore more appropriate to allow for a period of proposed modifications during autumn 2025 with adoption targeted for 2026 so thereby extending the plan period to 2041 (based on a minimum 15-year period as required by the NPPF). This itself will therefore require a further uplift of a minimum of 578 dwellings to cover the plan period.

4 THE SUSTAINABLE DEVELOPMENT STRATEGY

Sustainable Development and Spatial Strategy for Growth

- 4.1.1 Bloor Homes supports Policy S1 which reflects the presumption in favour of sustainable development including the provision for the delivery of new homes. The principles behind the proposed spatial strategy set out in Policy S2 are also broadly supported albeit, some amendments are recommended for soundness.
- 4.1.2 Policy S1 (part S1.1) identifies that the Plan will make provision for a minimum of 9,082 new homes over the plan period which equates to 478 dpa. Bloor Homes supports EHDC in making provision for, as a minimum, the full local housing need of the District which is essential to significantly boost housing supply in line with the Local Plan objective A1 and in accordance with the Government's objective of significantly boosting the supply of homes set out in paragraph 60 of the NPPF.
- 4.1.3 Whilst it is acknowledged that the proposed supply reflects the evidence available when the draft Plan is being prepared, it is important that the final Local Plan reflects the latest Government local housing need figures if housing need is to remain as met in full.
- 4.1.4 At this stage, the Statements of Common Ground with the neighbouring local authorities agree that EHDC will not address any unmet needs from these authorities and vice versa with exception of SDNPA. SDNPA is currently in the process of preparing the draft Local Plan and as such, it will be vital for EHDC to address any unmet need from SDNPA that may be identified across the South Down National Park. It is therefore recommended that as the EHDC Plan progresses, regard should be had to the SDNPA emerging Local Plan evidence base and seeks to take account of discussions about the apportionment of growth to ensure that it is consistent and sound.
- 4.1.5 More critically, the Statement of Common Ground prepared by PfSH highlights the pressing need of homes across South Hampshire. As outlined previously, the southern parishes of EHDC are located within the PfSH boundary and it is logical and imperative that EHDC seek to contribute to the wider unmet need across South Hampshire. Indeed, the PfSH Statement of Common Ground highlights that other authorities across South Hampshire have outlined meeting some of the area's unmet need in their adopted plans.

The Settlement Hierarchy

- 4.1.6 Bloor Homes supports the identification of Horndean as a focus for significant development and its position as 'Tier 2' settlement in the hierarchy presented in Policy S2. As recognised in the Settlement Hierarchy Background Paper (2022), Horndean is ranked 3rd across the East Hampshire (not including any SDNPA settlements) scoring highly in relation to access to key services (schools, leisure facilities, employment clusters) and is considered highly accessible therefore making Horndean a sustainable location for growth.
- 4.1.7 The adopted EHDC Local Plan cites that Horndean is one of the most sustainable settlements in the District alongside Alton and Petersfield. The adopted Plan seeks to direct the majority of the dwellings to these settlements and allocates 700 homes in Horndean over the plan period (2011-2028). As a percentage, this represents 25% of the overall housing delivery through site allocations in Horndean.
- 4.1.8 Conversely, under the draft Plan, it is proposed that Horndean, as a Tier 2 settlement, will deliver 320 new homes which represents only 9.1% of the overall number of homes to be delivered through site allocations. Given the spatial strategy for the District is to 'deliver the homes the district needs to grow sustainably' (Foreword to the draft Local Plan) and the Site being 'a focus for significant development', it is considered that the number of homes allocated to Horndean in the draft Plan should be significantly higher, following the approach in the current adopted Local Plan.

- 4.1.9 In the context of the above and housing need in particular, it is considered that Horndean offers a sustainable location for a higher proportion of the growth planned in the draft Plan which is supported at paragraph 3.2, highlighting that the scale and location of growth is a key matter of importance for the district.

Housing Strategy

- 4.1.10 It is important that EHDC plan to deliver, as a minimum, their housing need in full so that the objective A of the Plan can be realised and so to ensure that the Plan is consistent with paragraphs 15-84 of the NPPF.

- 4.1.11 Throughout the draft Plan, it is recognised that the area has issues with affordability which means that home ownership is increasingly unaffordable for many households. Indeed, highlighted at paragraph 2.2 of the HNEER notes that:

‘A significant driver of housing need under the standard method is affordability, measured by the ratio of median house prices to workplace-based earnings. In East Hampshire, this ratio stood at 12.70 in 2022, which leads to a 54% uplift of housing need above projected household growth. This is significantly above the ratio in the county, region, and England, as shown in Figure 2-1, and it has been consistently so over the past decade.’

- 4.1.12 To address this, and in order to support economic and employment growth targets, EHDC must significantly increase the number of affordable homes through the delivery of their housing need in full given that it site above the ratios for the wider South East (10.75) and England (8.28) as a whole (Figure 2-1 of the HNEBR).

- 4.1.13 Furthermore, in accordance with paragraph 61 of the NPPF, needs that cannot be met within neighbouring areas, including SDNPA and South Hampshire more widely as established through ongoing discussions in the Housing Market Area, should be taken into account to determine the minimum amount of housing to be planned for.

- 4.1.14 Additionally, EHDC can make allowance for windfall sites which as defines in the NPPF are ‘sites not specifically identified in the development plan’ (paragraph 70). Notwithstanding that EHDC state that has previously been a track record of housing delivery through windfall sites, the Inspector for the Joint Core Strategy (2014) acknowledged that this required a cautious approach given the unpredictability of supply from this source.

- 4.1.15 The Windfall Allowance Paper (2023) has estimated a windfall delivery of 56 dpa on small sites and 67 dpa on large sites. Over a period of seven consecutive years, less than 67 dpa were delivered on large sites. Whilst this will be monitored, it is considered more appropriate to secure delivery of housing in the later trajectory of the draft Plan period given the previous under-delivery and the fact that placing any reliance on windfall sites will have a wider impact on the delivery of services and infrastructure. This is of high importance in the draft Plan under the climate change and adaptation policies. Delivering homes through specific site allocations in sustainable locations will allow for a more sustainable growth pattern and allow EHDC to control where housing comes forward within their area that is supported with sufficient infrastructure and services.

Delivering the Infrastructure to Support Growth

- 4.1.16 Bloor Homes support EHDC’s delivery of infrastructure that is necessary to support the growth plans and as such, support the principle of Policy DGC1.

- 4.1.17 It is recommended that Policy DHC1 is amended as follows:

DGC1.1 New development should provide infrastructure necessary on-site and, where appropriate, off-site, to mitigate the impact of development and subject to viability testing. support new development will be available when first needed. To

~~achieve this, the delivery of development may need to be phased to reflect the delivery of infrastructure.~~

DGC1.2 Development proposals must consider all the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.

DGC1.3 The delivery of necessary infrastructure will be secured by planning condition in the first instance, followed by planning obligation and/or the Community Infrastructure Levy.

DGC1.4 When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had, to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation.

DGC1.5 If appropriate, the imposition of Grampian conditions will be considered to secure the provision of infrastructure when it is needed.

DGC1.6 New development will be supported where it can provide infrastructure requirements. ~~If the timely provision of infrastructure necessary to support new development cannot be secured in line with this policy, planning permission will be refused.~~

4.1.18 It is acknowledged that EHDC has prepared an Emerging Infrastructure Plan (2024) as part of the draft Plan’s evidence base. This is welcomed as it provides clarity on ongoing work with respect to contributions towards infrastructure enhancements likely to be sought. The Emerging Infrastructure Plan also signals how planned and future infrastructure delivery will be secured.

4.1.19 Additionally, it is recommended that sufficient flexibility is retained to account for scenarios where a bespoke approach to the delivery of infrastructure may be required. There will be cases where developments should be considered in a cumulative manner in order to be adequately funded and delivered without delay to development proposals coming forward.

5 GUIDING DEVELOPMENT POLICIES

- 5.1.1 Bloor Homes broadly supports the proposed development management policies. Comments on individual policies are provided below.

Policies CLIM1, CLIM2 and CLIM3

- 5.1.2 Bloor Homes recognise the aim of reducing carbon dioxide emissions and taking steps to reduce and mitigate the impacts of climate change. A ‘fabric first’ approach for the design of all dwellings is being delivered as part of the two Land East of Horndean reserved matters applications which will reduce energy demands.
- 5.1.3 It is recommended that to ensure that development can come forward, the following changes are made to Policies CLIM1 and CLIM2 so to ensure that development can remain viable and feasible and to ensure that the policies are consistent with the Written Ministerial Statement on Local Energy Efficiency Standards (2023) which states that local policies should not exceed existing or planning building regulations where it could impact development viability. Of relevance is the recent High Court judgement regarding the Salt Cross garden village in West Oxfordshire which recognised that Local Planning Authorities can set their own energy efficiency requirements that go beyond the requirements of Building Regulations and national policy. Notwithstanding this, EHDC must recognise that developers will incur significant additional costs to accommodate these requirements in both the design of their homes and the calculation of operational emissions. Therefore, the impact of this proposed policy on development viability and deliverability must be taken into consideration.
- 5.1.4 Paragraph 4.22 states the 35 kWh/m²/year total energy demand cap includes unregulated energy demand. Even with the use of operational energy models, it is challenging to accurately predict the energy usage of each household, and that a maximum usage cannot be enforced on future residents.
- 5.1.5 The following changes are therefore proposed:

CLIM1.3 Planning permission will be granted when the following requirements are met:

- a. The operational carbon dioxide emissions of residential development would be reduced to a net-zero level through on-site measures that are appropriate to site-related constraints and opportunities. In exceptional circumstances, any shortfall must be secured off site through planning obligations and/or as a financial contribution;
- b. The regulated carbon dioxide emissions of major non-residential development would be reduced to net-zero through on-site measures that are appropriate to site-related constraints and opportunities. In exceptional circumstances, any shortfall must be secured off site through planning obligations and/or as a financial contribution;
- c. The embodied carbon emissions of development would be reduced, including through the careful choice, use and sourcing of materials;
- d. Any new transport infrastructure (roads, footpaths, cycleways) has been designed to prioritise walking, cycling and the use of public transport;
- e. Infrastructure to support the use of zero-emissions vehicles would be provided;
- f. Development has been designed to minimise the overheating of buildings, conserve water supplies, reduce the ‘urban heat island’ effect, and provide or contribute to shaded and sheltered routes through open spaces.

CLIM2.1 b. All proposals for new homes will be informed by calculations of their predicted energy use intensity (EUI) prepared using an operational energy model. The calculations should be set out in the Sustainability

~~Statement and, where possible, will be expected to demonstrate that each new dwelling would achieve:~~

~~• a space heating demand of not more than 15 kWh/m²/year~~

~~• a total energy demand of not more than 35 kWh/m²/year~~

~~c. Developments, where possible, will generate at least the same amount of renewable energy on-site as their annual electricity demand for the operational energy of new homes (which should accord with criterion b), above).~~

~~d. All heating requirements, where possible, should be met without on-site use of fossil fuels.~~

- 5.1.6 Bloor Homes support the measures to reduce greenhouse gas emissions. The supporting text at paragraph 4.41 of policy CLIM3 uses the word ‘appropriate’ which would imply that the selection of suitable measures could be based on the type of development. It is important to allow for flexibility with respect of viability for development proposals as recognised in the NPPF which refers to a ‘transition to a low carbon future’ (paragraph 157) which will allow developers and the wider housing industry to evolve changes to construction practices and supply chains. It is recommended that the supporting text to Policy CLIM3 at paragraph 4.42 is updated as follows:

Not all of these options will be appropriate in every case, but designers and developers should consider which set of approaches is most suitable from early on in the design process, taking account of site specifics and impacts on development viability”.

- 5.1.7 Furthermore, at paragraph 4.41 it states that ‘simplifying the design and layout to ensure an efficient use of materials’. Bloor Homes recognise the importance of this, however, it is critical to strike a balance between this and providing the highest quality/well-designed homes. Where a varied material palette is requested, this will inevitably result in a less efficient use of building materials and potentially, a higher carbon footprint.

Policies NBE2 - Biodiversity, geodiversity and nature conservation and NBE3 – Biodiversity Net Gain

- 5.1.8 The principle of protecting and enhancing biodiversity and geodiversity is supported. However, there is duplication across Policies NBE2 and NBE3 relating to biodiversity net gain (BNG). To avoid repetition through the Plan, it is recommended that reference to BNG is removed in Policy NBE2.
- 5.1.9 Bloor Homes support the need for a Green Infrastructure Plan in line with paragraphs 96, 159 and 181 of the NPPF which require provisions for Green Infrastructure to support healthy lifestyles, reduce impacts of climate change and take a ‘strategic approach to maintaining and enhancing networks of habitats and green infrastructure respectively.
- 5.1.10 Paragraph NBE12.1f states that a “Green Infrastructure Plan should be submitted as part of the application process detailing how the development responds to Natural England’s 15 GI Principles and how it responds to the EHDC GI Strategy’s seven themes”. However, it is not clear on the timing of when a GI Plan would be required.
- 5.1.11 It is therefore recommended that the Green Infrastructure Plan is provided at either outline or full detailed planning applications as this will ensure that the development will be in accordance with the principles and themes from inception. As the Green Infrastructure Plan would become approved, it would then ensure continuity and compliance through any subsequent reserved matters applications. As such, suggested amended wording for Paragraph NBE12.1f is as follows:

'A Green Infrastructure Plan should be submitted as part of ~~the~~ **outline and full detailed planning** applications, detailing how the development responds to Natural England's 15 GI Principles and how it responds to the EHDC GI Strategy's seven themes.'

5.1.12 The PPG states at paragraph 006:

Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.

5.1.13 It is therefore recommended that the wording to Policy NBE3 is changed as follows:

NBE3.1 Development will only be permitted where a measurable BNG of at least 10% is demonstrated and secured in perpetuity (for at least 30 years) subject to:

- a. The latest DEFRA metric or agreed equivalent being submitted to quantify the baseline and post-development biodiversity value of the development site and off-site areas proposed for habitat creation.**
- b. The assessment being undertaken by a suitably qualified and/or experienced ecologist and is submitted together with baseline and proposed habitat mapping in a digital format with the application.**
- c. The submission of a 30 year management plan detailing how the post-development biodiversity values of the site and any supporting off-site mitigation will be achieved and funded over the time period; and**
- d. The location of any off-site habitats created are within areas which maximise opportunities for local nature recovery wherever this is possible.**

Policy DES1 – Well-Designed Places

5.1.14 Bloor Homes acknowledges that it is important that sustainable design is integral to development proposals, however, there is potential for sustainable design measure to impact upon the viability of a development and therefore, it is recommended that any cumulative impact on the proposed sustainability and design policies on viability is tested through the preparation of the draft Plan.

5.1.15 Moving forwards and as the draft Plan progresses, it will be critical to ensure consistency with any national initiatives and standards which may come into force during its preparation.

Policy DES2 – Responding to Local Character

5.1.16 It is noted that the draft Plan references adopting the nationally prescribed space standards for new development. If this approach continues to be justified, it is recommended that EHDC adopt some flexibility in the application of the standards so that new homes can be delivered that meet a specific need in the local community.

5.1.17 More generally, Bloor Homes question whether all parts of this policy solely relate to 'Responding to Local Character'. There are elements which are general and do not relate to specific characteristics of an area. On this basis and to provide more clarity, it is recommended that Policy DES2 is provided with an alternative name – '**Building Design and Responding to Local Character**'.

Policy DES3 – Residential Density and Local Character

- 5.1.18 Paragraph DES3.2c states that “Any new streets must be wide enough and any new public open spaces must be large enough to accommodate green infrastructure that will provide effective climate resilience for residents (see Policy CLIM5)”. It is assumed that this reference to Policy CLIM5 relates to Paragraph CLIM5.2b, which states that green infrastructure is to be used to accommodate substantial areas of shade, shelter and cooling within the development and should use a mix of species that are resilient to pests, diseases and changes in growing conditions.
- 5.1.19 Bloor Homes support of the provision of green infrastructure, however it is unclear as to whether Paragraph DES3.2c refers to tree planting only. Neither grass or hedgerows can realistically accommodate shade, and grass planting cannot accommodate shelter.
- 5.1.20 It is also not clear where the green infrastructure is to be provided; does this apply to highway land, or whether the provision of GI on plot boundaries and gardens would be considered acceptable.
- 5.1.21 On this basis, Bloor Homes is of the view that Policy DES3 is not “clearly written and unambiguous” as required by Paragraph 16d of the NPPF. As such, suggested amended wording for Paragraph DES3.2c is as follows:

“Any new streets must be wide enough and any new public open spaces must be large enough to accommodate green infrastructure that will provide effective climate resilience for residents **and includes the planting of trees, hedgerows, grass, and other flora** (see Policy CLIM5).”

Policy H2 – Housing Mix and Type

- 5.1.22 Bloor Homes supports EHDC in seeking to deliver a mix of housing types and sizes to meet the needs of the community to provide choice and encourage sustainable, inclusive and mixed communities. Depending on the context of the local area, this can result in the delivery of different types of homes. Parts H2.1 and H2.2 are therefore welcomed.

Policy H3 – Affordable Housing

- 5.1.23 Bloor Homes recognise that there are affordability issues within the district and support the delivery of affordable housing. It is important that allocated sites are tested through the draft Plan’s preparation period to understand whether each site can viably deliver the target affordable housing quantum alongside the infrastructure requirements. Furthermore, whilst an identified housing need will be across the district, it is critical to understand any local requirements. Flexibility should therefore be afforded to when assessing the need at a localised level.
- 5.1.24 As set out in Policy DES3, development ‘must optimise the density of new residential uses through making an efficient use of land, whilst delivering a contextually appropriate and coherent built form’. A distinction must be made between what is and is not appropriate.
- 5.1.25 A further consideration is that although smaller dwellings have a reduced footprint, a higher provision of these would likely result in more private cars overall on a site. This may pose difficulties in providing sufficient and adequate parking, particularly to the design expectations of proposed Policy DES2.
- 5.1.26 It is therefore suggested that Paragraph H2.2 of the policy is amended as follows:

‘Taking account of the most up to date housing information **and site-specific circumstances**, applications for residential development should demonstrate how the proposal will address the...’

- 5.1.27 Proposed Policy H2 requires that subject to design considerations, all market homes must meet Building Regulations M4(2) ‘accessible and adaptable dwellings’ unless evidence indicates it is

not feasible. Affordable dwellings should also meet M4(2) standards, subject to site suitability, with a proportion to be 'M4(3) 'wheelchair user dwellings' standards where evidenced by local need.

- 5.1.28 Bloor Homes note that this requirement is subject to design considerations as it is not always possible to make provisions for accessibility and adaptability. Paragraph 10 of the guidance for optional technical standards states 'In setting policies requiring M4(2) and M4(3) compliant dwellings, local planning authorities will need to assess whether this has an impact on non-lift serviced multi-storey development in their local housing mix. Where step-free access in this type of development is not viable, neither of the Optional Requirements in Part M should be applied'.
- 5.1.29 To clarify this position, it is recommended that an addition of a footnote at Paragraph H2.4 referring to this point to the likes of "Subject to design considerations¹", with the guidance text included in full within the footer of the page:

'In setting policies requiring M4(2) and M4(3) compliant dwellings, local planning authorities will need to assess whether this has an impact on non-lift serviced multi-storey development in their local housing mix. Where step-free access in this type of development is not viable, neither of the Optional Requirements in Part M should be applied – Planning Practice Guidance, Housing: Optional Technical Standards'.

6 HOUSING NEED

6.1.1 Paragraph 61 of the NPPF requires local planning authorities to ‘determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance’.

6.1.2 There is a pressing need and chronic affordability issue in EHDC. This section justifies the requirement for a higher housing need figure as set out below.

Housing Need

6.1.3 Based on the current outputs, housing need in East Hampshire is 10,982 over the plan period which equates to 578 per annum. For the Local Plan area (i.e. excluding the SDNPA) an additional 266 of unmet need from the National Park is attributed to East Hampshire which equates to 14 per annum.

6.1.4 An important consideration is PfSH’s Spatial Position Statement (2023) which indicates that there is an unmet need of circa 12,000 homes across South Hampshire. The Statement also indicates that Havant district has a -2,603 housing shortfall. Notwithstanding that PfSH will seek to outline ‘Broad Area of Search’ (Spatial Position Statement, 2023), the draft Plan states that this can be achieved in the longer term and therefore there is no requirement to identify where this unmet need can be delivered. This is disputed as it is therefore imperative that this unmet need is planned for in the plan period to 2041.

6.1.5 At paragraph 2.23 of the HNEBR, it states that the Local Plan requires a minimum of 2,857 dwellings to be found over the plan period. In noting that Policy S1 of the draft Plan states that a further 10-15% buffer should be created, EHDC increase of housing delivery to 3,500 dwellings only represents 7.1% of the local housing requirement. At paragraph 2.22 of the HNEBR it states that ‘a buffer supply of 10-15% would require allocating a further 265-719 dwellings over the plan period’.

6.1.6 As indicated previously within these representations, a windfall allowance of 56 dpa on small sites and 67 dpa on large sites. It has been argued that the windfall on larger sites should not be considered given the average delivery is only 22 homes over the last seven years. There is no guarantee that this delivery of homes will come forward in a sustainable way. On smaller sites, 56dpa will ultimately deliver 840 homes over 15 years. This figure is much lower than the draft Plan assumes will be delivered. It is imperative therefore that to meet this objective for climate change adaptation is achieved, it will be necessary to allocate more homes to ensure there is direction and control over locations for growth.

6.1.7 Paragraph 61 of the NPPF relates to determining the minimum number of homes needed using the standard method. It also highlights that exceptional circumstances may justify a different approach to assessing housing need including market signals.

6.1.8 The draft Plan acknowledges that paragraph 3.8, the total unmet needs of neighbouring authorities is currently unknown. Furthermore, the PfSH Spatial Position Statement (2023) highlights that there is indeed an unmet need of approximately 12,000 homes to 2036. It is acknowledged that the precise extent of the unmet need and its wider distribution are unknown, the existence of this unmet need weighs in favour of higher housing delivery in East Hampshire. As indicated in the HNEBR, it is considered therefore that the indicated buffer supply is insufficient (paragraph 2.26).

6.1.9 The NPPG states that in East Hampshire there is an acute need for affordable housing. The HNEBR notes that whilst the approach taken by East Hampshire to estimate affordable need is robust, it is critical that this need warrants increasing housing delivery above the standard method. At paragraph 4.8 of the HNEBR demonstrates that a review of the historic affordable stock losses and rate of affordable housing delivery suggest that as a proportion of total delivery, much higher housing delivery is required.

- 6.1.10 In the period 2012-2023, affordable housing stood at 26% of the overall proportion of delivery. As stated in paragraph 4.10 of the HNEBR, assuming that 40% affordable delivery is met, 33,784 dwellings would be required over the plan period which is significantly above the standard method. This is unlikely to be met in full given the magnitude but it is, however, a valid reason to go above the standard method in order to address this unmet need. What is striking, as highlighted at paragraph 3.9 of the HNEBR, only 59% of the new dwellings will represent net additions, therefore, 26% of this will represent only 15% of new affordable homes. This is a chronic issue that should be addressed in the short term.
- 6.1.11 To summarise, the draft Plan allows for 643 dwellings to act as a buffer however, the HNEBR calculates that a further 265-719 dwellings should be allocated over the plan period in order to meet to the 10-15% benchmark buffer. Alongside this, East Hampshire need to provide an additional 578 to cover the extended plan period to 2041 as well as dealing with the chronic need for affordable homes. These factors, as well as the unmet need from South Hampshire, are significant and must be addressed through the deliver of allocations to support the affordable delivery of new homes on sites that are sustainable. This will guarantee that a greater extent of the affordable need can be addressed.

Draft Local Plan – Allocated Sites

- 6.1.12 The Site at Hazleton Farm has been included in the LAA (reference: LAA/RC-009) as having a total capacity of 935 new homes. The conclusion in the LAA confirms the site is ‘developable’.
- 6.1.13 Whilst it is recognised that sites deemed ‘developable’ in the LAA will not automatically be allocated in the draft Plan, there has been no clear review or quantifiable justification within the IIA as to why these sites have ultimately been excluded from draft allocation in the emerging Plan.
- 6.1.14 A review and assessment of the draft allocated site in the Plan has been undertaken. Taking the extended plan period to 2041 along with the requirement to consider South Hampshire’s unmet need, it is considered that the Site is developable and should be included in the draft Plan going forwards for the following reasons set out below.
- 6.1.15 Whilst the settlement hierarchy is supported, the strategic delivery of homes does not correspond with the spatial strategy and vision in terms of the proportion of growth. As highlighted previously, the draft Plan only seeks to deliver 9.1% of the overall number of homes through site allocations in Horndean, compared to 25% in the current adopted Local Plan.
- 6.1.16 It is considered that this level and density of housing is more appropriately located in a higher tier settlement, such as Horndean which benefits from existing infrastructure and future planned infrastructure which will be delivered through the outline permission to the north of the Site (application reference: 55562/005) that can support a higher proportion of the housing need in East Hampshire. As such, whilst in agreement with the tier hierarchy, the wider spatial strategy does not align with the latter.
- 6.1.17 There are three sites allocated for housing in Alton within the draft Plan. Figure 12.1 of Chapter 12 in the draft Plan highlights that Alton is Tier 1 in the settlement hierarchy. Figure 12.1 also highlights at of the 1,700 homes proposed as new allocations in Alton, 700 of those will be identified through the Alton Neighbourhood Plan. This ‘significant proportion’ of homes should not be left to be allocated appropriately through a neighbourhood plan. It is considered to be more appropriate to allocate this through the draft Plan, which will then allow Alton Neighbourhood Plan to allocate smaller housing sites which will still contribute to the housing need target.
- 6.1.18 In addition to the above and in reviewing the level of homes proposed to come forward as site allocations, concern is raised regarding the following site allocations in Borden.
- 6.1.19 Allocated site references WHI-022 proposes 27 homes but the site is completely covered in woodland and is located within the Oxney Farm Woodland SINC. If brought forward for housing,

the development will have major impacts upon biodiversity along with the loss of existing habitats and species. Delivering housing in this location is not sustainable and will have a detrimental impact on the existing rich biodiversity on the site. It is therefore recommended that this site be removed as an allocation.

Site LAA/RC-009 – Land east of Horndean (Hazelton Farm)

- 6.1.20 Horndean is recognised in the draft Plan as one of the largest settlements in the Local Plan area with a population of 12,500 (2021 census data). It can clearly accommodate additional homes and there is opportunity to include infrastructure. Furthermore, it is in a sustainable location; in close proximity to a local centre, community services and primary school as part of the site allocation HN1 which has outline planning permission (application reference: 55562/005).
- 6.1.21 As shown in the accompanying Vision Document, the Site will provide a unique opportunity to deliver a significant proportion of the housing in a sustainable location. It should be noted that whilst part of the Site to the south is located in Havant District Council but as the Vision Document shows, no housing is proposed in this area and therefore, the delivery of homes that the Site will secure if adopted in the draft Plan, should solely relate to East Hampshire district.
- 6.1.22 Due to quantum of housing and the Site's size, it will also be able to deliver a local centre, employment land as well as space for recreation. Vehicular access and pedestrian connections can be made through the site to the north which benefits from outline planning permission thereby creating a consistent and legible movement network.
- 6.1.23 The Site is located within Flood Risk Zone 1 demonstrating that it is not susceptible to flooding. The Site is greenfield and entirely out of the South Down National Park. The size and location of the Site will allow for the creation of generous green links, especially in the context of the Havant Thicket Reservoir coming forward, connecting green infrastructure whilst preserving landscape heritage including the neighbouring protected woodland. A small part of the Site to the south is designated as SINC (Blendworth Common (North)) which will be retained and managed. The delivery of this Site for development will maintain the gap between Horndean and Rowlands Castle. It therefore represents a logical and natural extension to the existing built environment and will deliver housing and employment requirements over the proposed Plan period.

7 Summary and Conclusion

- 7.1.1 Stantec is instructed by Bloor Homes Limited to submit these representations to the 'Regulation 18 – part 2' Draft Local Plan consultation document published by East Hampshire District Council.
- 7.1.2 Bloor Homes support EHDC in preparing a new Local Plan for the District to guide development and welcome the opportunity to work proactively and collaboratively with EHDC to continue the preparation of the draft Plan.
- 7.1.3 It is critical for the draft Local Plan to allocate sufficient housing, notwithstanding previous windfall sites, and go some way in meeting unmet need from the wider South Hampshire area. In light of the recommended extension of the plan period for another year, to 2026, this will increase the housing need to deliver a further 578 homes across the plan period.
- 7.1.4 The Site represents a sustainable and developable option located in a tier 2 settlement with the delivery of future infrastructure coming forward as part of the outline planning permission (reference: 55562/005) to the north of the Site. As part of the Havant reservoir proposals, this Site will deliver nearly 1,000 homes, employment and a local centre whilst allowing for wider green linkages for future generations to enjoy.
- 7.1.5 The Site offers an opportunity for sustainable growth of Horndean contributing to housing need as well as public open space. As detailed in Section 6, the site is suitable and available for development and could be delivered in the short to medium term.
- 7.1.6 To conclude, it is considered that the draft Plan in its current form is not justified, effective or positively prepared and is not therefore consistent with national policy. The plan period needs to be extended to 2041, there is a significant need to increase housing delivery across the district due to the need for a 10-15% buffer, to address a proportion of the unmet need from Havant in the southern part of EDHC within the PUSH area at Horndean, and the identified requirement to address a greater proportion of the outstanding need for affordable housing. As such, the draft Plan does not accord with the NPPF and is currently unsound.

APPENDIX 1



**EAST HAMPSHIRE HOUSING NEED
EVIDENCE BASE REVIEW**

A review of the evidence on housing need in East Hampshire, including affordable housing need and the SDNPA area

28 February 2024

Prepared for:
Bloor Homes Limited

Prepared by:
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Project Number:
333100886

East Hampshire Housing Need Evidence Base Review

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3	Final						28/02/2024

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Executive Summary

- i. This report has been prepared by Stantec Development Economics to review housing need in East Hampshire in the context of its emerging Local Plan. This is in relation to written representations to support allocation of a site at Land South of Horndean, East Hampshire in the emerging East Hampshire Local Plan.
- ii. Using the government's standard method, the East Hampshire local plan gives housing need in the district as 10,982 over the 2021-2040 plan period. 8,816 of this is within the part of the district *not* in the South Downs National Park (SDNP). Including some unmet need from the SDNP increases this to 9,082.
- iii. A review of the interim 2021-based population projections strongly suggests that the use of 2014-based household projections, in line with government guidance, is preferable to 2018-based projections.
- iv. The HEDNA (prepared by Icenic) reviews and concludes that *'there is no basis to increase local housing need in the context of projected economic growth in East Hampshire'*. There is also no rationale for doing so on the basis of growth funding or strategic infrastructure projects (including Solent Freeport). We have reviewed the evidence and agree that this is so.
- v. The local plan states that a further 643 dwellings will be allocated as a 'buffer' to ensure flexibility. This, however, represents just 7.1% of identified LHN. 10-15% is a recommended benchmark; a further 265-719 dwellings should be allocated to achieve this.
- vi. The net extent of unmet need in districts around East Hampshire to 2036 is estimated at 11,033 dwellings for the 2023-2036 period (16,125 over a 19-year period). The distribution of this need and ability of other authorities to accommodate it is not yet fully clear, but none has yet been accounted for in East Hampshire's local plan. Havant in particular generates substantial unmet need, and is close to Horndean.
- vii. The approach taken by Icenic to allocating standard method housing need between areas of East Hampshire inside and outside the SDNP is broadly reasonable, as is the extent of unmet need from the National Park allocated to the rest of the district.
- viii. The approach to estimating affordable housing need in the HEDNA appears to be robust and a fair assessment. The HEDNA concludes, however, that the identified affordable need does not merit overall delivery being increased above standard method.
- ix. Given the likely stock losses of affordable housing (on average, net additions are 59% of gross additions) and historic affordable housing delivery rates (26% of total delivery), we conclude that delivery of standard method housing need is highly unlikely to meet affordable need in East Hampshire. In theory, overall housing delivery in the LPA would need to be 33,784-51,975 dwellings over the plan period to meet the affordable housing need identified by the HEDNA.



1 Introduction

- 1.1 This housing need report has been prepared by Stantec Development Economics for Bloor Homes Limited. This is in relation to written representations to support allocation of a site at Land South of Horndean, East Hampshire in the emerging East Hampshire Local Plan.
- 1.2 To that end, the remainder of this report is structured as follows:
- 1.3 Section 2, The Local Housing Need Calculation, reviews the findings and methodology of the Local Plan and the HEDNA prepared by Icení which forms part of its evidence base. This includes consideration of economic factors, planning policy and guidance, and the housing requirement for the part of the South Downs National Park within East Hampshire.
- 1.4 Section 3, Review of Evidence on Affordable Housing Need, considers the findings with respect to affordable housing provision, and how this relates to overall housing need.
- 1.5 Section 4, Conclusions, summarises our findings.

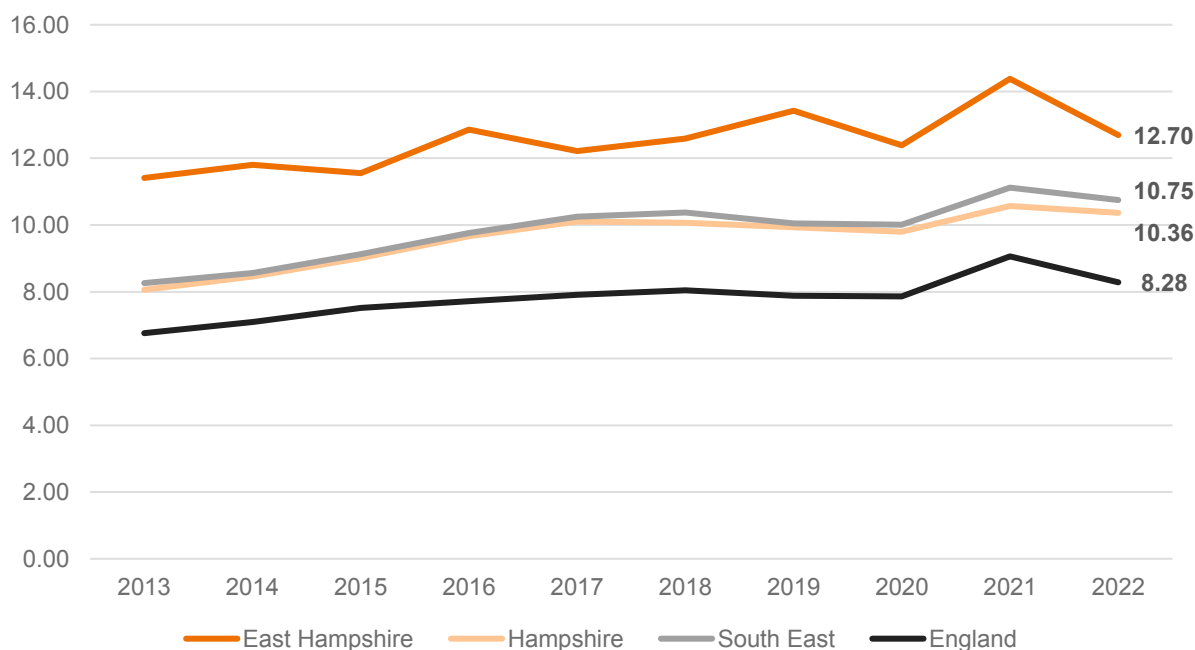


2 The Local Housing Need Calculation

East Hampshire LHN

- 2.1 On the current outputs of the standard method as given in the draft local plan, housing need in East Hampshire (including the part of the South Downs National Park (SDNP) which falls within it) is 10,982 over the plan period 2021-2040 (578 per annum).¹
- 2.2 A significant driver of housing need under the standard method is affordability, measured by the ratio of median house prices to workplace-based earnings. In East Hampshire, this ratio stood at 12.70 in 2022, which leads to a 54% uplift of housing need above projected household growth.² This is significantly above the ratio in the county, region, and England, as shown in Figure 2-1, and it has been consistently so over the past decade.
- 2.3 The role of the affordability adjustment, as set out in planning practice guidance³, is to address historic under-supply and the affordability of homes. It is therefore aimed at allowing new households whose formation has been suppressed by lack of supply to form. The acute affordability pressures in East Hampshire (indicated by its high ratio of prices to earnings) implies that the scale of this issue is very significant locally.

Figure 2-1: Comparison of housing affordability (workplace-based), East Hampshire and comparators, 2013-2022



Source: ONS House price to workplace-based earnings ratio

¹ Our Local Plan 2021-2040, January 2024 [download \(easthants.gov.uk\)](https://www.easthants.gov.uk)

² In this case, the 40% cap does not apply due to the level of the existing Adopted Local Plan number.

³ [Housing and economic needs assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk), Paragraph: 006 Reference ID: 2a-006-20190220



East Hampshire Housing Need Evidence Base Review

2 The Local Housing Need Calculation

- 2.4 The NPPF states at paragraph 22 that '*strategic policies should look ahead over a minimum 15 year period from adoption*'.⁴ East Hampshire District Council Local Development Scheme (LDS) currently targets the Regulation 19 consultation for July 2024 with the Plan targeted for submission in December 2024. It is anticipated that the Examination in Public will take place in January 2025 with the Inspector's Report due by August 2025. Adoption is targeted for September 2025.⁵ This timeframe does not allow for sufficient time. Assuming submission of the Plan will take place at the end of 2024, it is unlikely that the Examination will take place before Easter 2025 with proposed modifications anticipated for the Autumn. This has the potential, in reality, to extend in to early 2026 with adoption therefore likely to take place at the end of the 2025/2026 monitoring period. As such, the draft Plan needs to extend the plan period to 2041.
- 2.5 The figure given in the HEDNA, which was produced by Icení in May 2022, is 10,744 over a shorter plan period, 2021-2038 (632 per annum).⁶ We will be reviewing the assumptions and methodology of the HEDNA, but focusing on the more up-to-date figure from the local plan; in any case, both documents agree on the use of the standard method.
- 2.6 For the Local Plan Area (East Hampshire excluding the part of SDNP within it), housing need is given in the local plan as 8,816 over the plan period (464 per annum). This is based on the delivery of 1,900 (100 per annum) in the part of East Hampshire within the SDNP and 266 (14 per annum) potential unmet need from it.
- 2.7 Including unmet need from the SDNP area therefore results in a requirement of 9,082 dwellings, 478 per annum. The following are deducted from this:
- 940 net completions already done.
 - 3,965 existing planning permissions.
 - 1,320 expected from windfall developments.
- This results in a minimum of 2,857 to be found over the plan period.
- 2.8 Icení's *Technical Note: Testing the Standard Method Housing Need for East Hampshire (Update)* notes that 2014-based projections were used, in accordance with PPG.⁷ More up-to-date projections (presumably 2018-based) would have resulted in slightly lower need.
- 2.9 Icení note that using alternative projections would not be compliant with PPG. Moreover, some data (presumably the Census, which revised up East Hampshire's population in 2021 – as shown in Icení's Figure 2) suggest that 2014-based projections may underestimate growth and until new ones are developed by ONS one cannot be certain.
- 2.10 New household projections have not yet been produced, but since the publication of the Technical Note, interim 2021-based *population* projections have become available. These are

⁴ [National Planning Policy Framework - 3. Plan-making - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) Paragraph 22

⁵ [Local plan timetable | East Hampshire District Council \(easthants.gov.uk\)](https://www.easthants.gov.uk/local-plan-timetable)

⁶ Housing and Employment Development Needs Assessment, May 2022 [download \(easthants.gov.uk\)](https://www.easthants.gov.uk/download)

⁷ [East Hampshire technical note - September 2023.pdf \(easthants.gov.uk\)](https://www.easthants.gov.uk/east-hampshire-technical-note-september-2023.pdf)

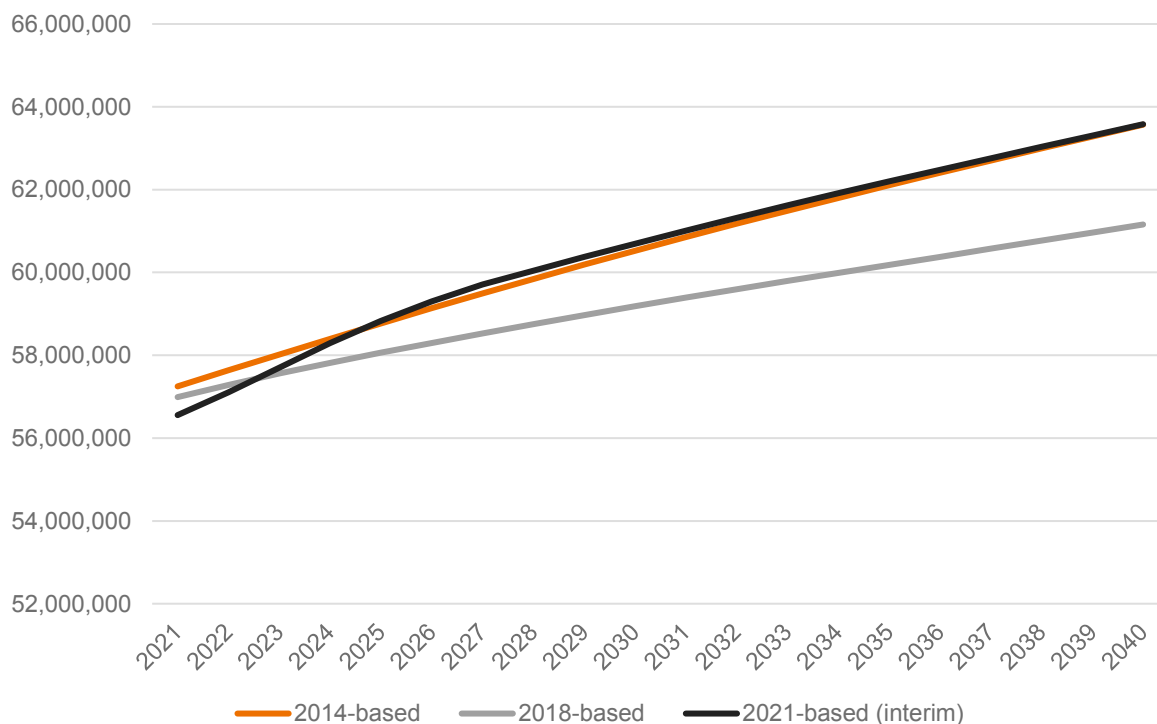


East Hampshire Housing Need Evidence Base Review
2 The Local Housing Need Calculation

an imperfect proxy⁸ and only available at national level, but at a high level they do suggest that the use of 2014-based projections is appropriate.

- 2.11 Figure 2-2 compares English population over the plan period under the 2014-, 2018-, and 2021-based projections.
- 2.12 Whilst the 2021-based projections need to be treated with some caution, they suggest a dramatically different picture to the 2018-based projections, and one which is very similar to the 2014-based. By the end of the plan period in 2041, the figures from the 2014-based and 2021-based projections are only 5,000 apart – 63,854,282 and 63,849,733 respectively. The 2018-based figure is some 2.5 million lower, at 61,353,733. To look at it another way, this difference would translate into in excess of 1 million additional households across England in 2041⁹.

Figure 2-2: Comparison of 2014-based, 2018-based, and interim 2021-based principal population projections for England, 2021-2040



Source: ONS principal population projections and mid-year population estimates¹⁰

- 2.13 This strongly suggests that the 2014-based household projections are a good indication of future need, at least at national level. Analysis of Census 2021 and mid-year population estimates data in Icení’s technical note suggests that a 2021-based projection may show higher future growth and therefore housing need.

⁸ Insofar as a larger population will, other things being equal, generate more households, but the precise relationship depends on household sizes.

⁹ Average household size in 2022 was 2.36. Using this, 2.5 million people translate into 1.06 million households. As household sizes are projected to fall, this will go up. [Families and households in the UK - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/families-and-households-in-the-uk)

¹⁰ Mid-year population estimates used for 2021, 2022 in the 2021-based (interim) projections



2.14 The rest of this section will consider:

- Whether the balance between jobs and homes has properly been taken into account.
- Other circumstances, such as unmet need, that might justify setting LHN higher.
- The appropriateness of the housing requirement for the SDNP area.

2.15 The following section of this report will focus on affordable housing need.

The balance between jobs and homes

2.16 On planning for a higher housing need figure than the standard method indicates, planning practice guidance confirms that:¹¹

Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; (note that unmet need will be considered in the following sub-section)*

2.17 The HEDNA presents evidence on the East Hampshire economy (chapter 3).

2.18 Key findings of this evidence include:

- Over the period between the financial crisis and the Covid-19 pandemic (2009-2019), East Hampshire's GVA grew by 13%, compared to 20% across Hampshire and 25% for the South East and UK. It was also growing more slowly before 2009.
- Employment in East Hampshire has declined over the last decade, in contrast to growth in the county, region, and nation. Notwithstanding that, economic participation is high and unemployment is low.
- In 2011, 44% of resident workers commuted out of the district, whilst only 32% of workplace workers commuted in.
 - We have reviewed the relevant data from the 2021 Census. It shows that East Hampshire had **58,354 workplace workers and 103,825 resident workers**. 45,833 people lived and worked in the district. These results are seriously affected by the lockdown in place on Census day, but the extent to which

¹¹ [Housing and economic needs assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/91111/Housing_and_economic_needs_assessment_-_GOV.UK_(www.gov.uk).pdf), Paragraph: 010 Reference ID: 2a-010-20201216



residents exceed workers strongly suggest that there are still high levels of out-commuting.

- Population growth has exceeded that of the county, region, and nation, but growth in the *working age population* has been very weak.
- Relative to Hampshire and the South East, East Hampshire's business base is dominated by smaller businesses (<10 employees), with larger businesses (especially those with 50+ employees) under-represented.
- East Hampshire has a highly-skilled population, with relatively few residents with no qualifications, and a high proportion (50.3%) holding degree-level qualifications.

2.19 In chapter 5, Overall Housing Need, the HEDNA concludes that *'there is no basis to increase local housing need in the context of projected economic growth in East Hampshire'*. It notes that Oxford Economics forecasts show an expected 2,700 jobs over the 2021-2038 period used in the HEDNA, far less than the labour force supply of 7,917-9,574 generated by delivery of standard method housing need.

2.20 In the same chapter, it notes that there is no growth funding in place for East Hampshire. We have verified that this is still the case.

2.21 Regarding strategic infrastructure projects, we agree that the main relevant event in Hampshire is the 'freeport' designation awarded to the Port of Southampton. The Solent Freeport Bid's Full Business Case estimates that it will create over 15,000 jobs directly in the Solent, with further impacts in the wider supply chain, over the 2022-2042 period.¹² The Solent region is not clearly defined, though the Solent LEP does not include East Hampshire.¹³

2.22 Nevertheless, it is reasonable to assume there may be some freeport-related job creation impacts through the supply chain in East Hampshire. Given the significant gap between forecast job growth and labour supply generated by standard method-based housing delivery, however, we accept that the HEDNA has sufficiently accounted for the balance between jobs and growth, and housing need does not need to be increased on the grounds of economic growth.

Other circumstances justifying higher LHN

'Buffer' supply

2.23 The local plan Policy H1: Housing Strategy correctly notes that sites capable of supplying a further 10-15% should be allocated to create a buffer, allowing for flexibility and for sites not coming forward. On this basis the residual requirement (total 9,082 less net completions, existing planning permissions, and expected windfall) is increased from 2,857 to 3,500.

2.24 This increase, of 643, represents 7.1% of the total LHN; to meet the 10-15% benchmark (of total LHN, 9,082) would require an increase of 908-1,362 dwellings, as shown in Table 2-1.

¹² [Sept-2022_Solent-FBC-Resubmission_vsent-4_Redacted.pdf \(solentfreeport.com\)](#), pages 28-29

¹³ [Map - Solent LEP](#)



East Hampshire Housing Need Evidence Base Review

2 The Local Housing Need Calculation

2.25 Therefore, ensuring a buffer supply of 10-15% would require allocating a further 265-719 dwellings over the plan period (14-38 per annum) in addition to the 643 (34 per annum) already allocated.

Table 2-1: Calculation of increase in buffer supply required

		Plan period 2021-2040	Per annum
East Hampshire LPA		8,816	464
Unmet need from Park area		266	14
Total LHN		9,082	478
Buffer supply, Policy H1 (a)		643	34
<i>As % of LHN</i>		<i>7.1%</i>	
Buffer set as % of total LHN (b)	10%	908	48
	15%	1,362	72
Required increase in buffer supply (b – a)	10%	265	14
	15%	719	38

Source: Local plan

Unmet need

2.26 Planning practice guidance confirms that¹⁴:

- Strategic policy-making authorities should produce, maintain, and update statements of common ground throughout their plan making process, and local planning authorities are bound by the statutory duty to cooperate. The NPPF confirms that strategic policies should make sufficient provision for housing¹⁵.
- A statement of common ground is a way of demonstrating at examination that plans are based on effective joint working across local authority boundaries and that the duty to cooperate has been complied with.
- It should contain (inter alia) the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement, and distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area, i.e. from other authorities.
- When authorities are in a position to do so, the statement is expected to set out information on capacity to meet their own identified needs, extent of any unmet need

¹⁴ [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/plan-making-guidance) 009 Reference ID: 61-009-20190315; 010 Reference ID: 61-010-20190315; 011 Reference ID: 61-011-20190315; 012 Reference ID: 61-012-20190315; 022 Reference ID: 61-022-20190315; 065 Reference ID: 61-065-20190723.

¹⁵ [National Planning Policy Framework - 3. Plan-making - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/national-planning-policy-framework-3) Paragraph 20



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within the strategic policy-making authority areas, and (dis)agreements about the extent to which these unmet needs can be redistributed within the wider area.

- Authorities are not obliged to accept needs from other areas where it can be demonstrated that so doing would have an adverse impact when assessed against policies in the National Planning Policy Framework.

2.27 Unmet need to be addressed in neighbouring planning authorities could relate to the SDNPA and neighbouring local authorities (whether in Hampshire or not). Assumptions are made in the local plan on the former (the 266 dwellings – 14 per annum – added to East Hampshire’s housing need), and these will be reviewed in more detail in a later sub-section. On the latter, the local plan’s Housing Background Paper notes that an unmet need of 12,000 homes to 2036 has been identified in the South Hampshire sub-region, and says that:

‘For the purposes of this Local Plan, no assumptions are made on the unmet needs of other neighbouring local planning authorities (with the exception of the SDNPA), but any dwellings surplus to the identified requirements could be attributed to any future identified unmet need, particularly in the South Hampshire sub-region. East Hampshire Local Planning Authority continues to work with neighbouring authorities and future iterations of the local plan will be informed by further information on potential unmet need under the duty to cooperate.’

2.28 The figure of 12,000 homes to 2036 is based on a 2023 report from Partnership for South Hampshire (PFSH)¹⁶. Table 1 of that report compares estimates of housing need and supply from 2023-2036 for the constituent South Hampshire authorities¹⁷.

2.29 Table 2-2 builds on the PFSH analysis to show estimates of unmet need for local authorities around East Hampshire. This includes the other PFSH authorities (in their entirety, not just the parts of Test Valley and Winchester in PFSH), three other Hampshire authorities, plus two non-Hampshire authorities which border East Hampshire – Waverley in Surrey and Chichester in West Sussex.

2.30 The latest figure for standard method housing need in dwellings per annum is included for all authorities. For PFSH authorities, the estimated shortfall or surplus is taken from their report’s Table 1. For others, we have reviewed adopted or draft local plans¹⁸, and estimated surplus or shortfall based on difference between housing target and standard method. Necessarily these are approximations – districts’ own housing need may vary from standard method, target numbers may change, and delivery may of course differ from targets. Moreover, standard method housing estimates here differ very slightly from those in the PFSH report.

¹⁶ [PFSH-Spatial-Position-Statement-6-December-2023.doc \(live.com\)](#)

¹⁷ Eastleigh, Fareham, Gosport, Havant, New Forest, Portsmouth, Southampton, plus southern parts of East Hampshire, Winchester, and Test Valley.

¹⁸ [Draft Local Plan 2040 | Test Valley Borough Council](#) Paragraph 3.56; [Regulation 18 Local Plan - Winchester City Council Strategic Policy H1; 1592.pdf \(basingstoke.gov.uk\)](#) Paragraph 4.7; [hart_lpss.pdf](#) Paragraph 90; [final_rushmoor_local_plan_web_version.pdf](#) Paragraph 6.12; [LPP1 July 2019_web.pdf \(waverley.gov.uk\)](#) Chapter 6; [Chichester District Council - Chichester Local Plan 2021 - 2039: Proposed Submission \(oc2.uk\)](#) Paragraph 5.2.



Table 2-2: Estimated housing shortfall or surplus by local authorities neighbouring East Hampshire, 2023-2036

	Standard method	Housing delivery target	Estimated shortfall / surplus (2023-2036)	Source	Unmet need status
Eastleigh	655	-	-2,511	PfSH Spatial Position Statement	Generating
Fareham	512	-	900	PfSH Spatial Position Statement	Meeting
Gosport	344	-	-2,071	PfSH Spatial Position Statement	Generating
Havant	513	-	-2,603	PfSH Spatial Position Statement	Generating
New Forest	729	-	-5,652	PfSH Spatial Position Statement	Generating
Portsmouth	894	-	-383	PfSH Spatial Position Statement	Generating
Southampton	1,498	-	0	PfSH Spatial Position Statement	Neither*
Test Valley	539	550	143	2020-2040 Draft Local Plan	Meeting**
Winchester	684	781	1,261	2019-2039 Regulation 18 Local Plan	Meeting
Basingstoke and Deane	830	850	260	2011-2029 Local Plan, OAN	Meeting
Hart	297	410	1,469	2014-2032 Local Plan, OAN	Meeting
Rushmoor	270	436	2,158	2014-2032 Local Plan, SHMA	Meeting
Waverley	713	590	-1,599	2013-2032 Local Plan, OAN	Generating
Chichester	760	575	-2,405	2021-2039 Local Plan Proposed Submission	Generating

Source: PfSH Spatial Position Statement, relevant local plans, Stantec analysis

* The 35% urban uplift creates unmet need which cannot be apportioned elsewhere; without it, Southampton would generate a surplus.

** Target already includes unmet need from Havant.

2.31 On these estimates, seven of the nearby authorities generate unmet need to be met elsewhere, whilst six create a surplus from which this unmet need could be met. One should note, however, that:

- The unmet need from the 'generating' authorities far exceeds that currently expected to be met by the 'meeting' authorities. The total shortfall is 11,033 (very close to the initial 11,771 estimated by PfSH). A simple extrapolation from a 13- to 19-year plan



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period takes this to 16,125. This is driven by very large shortfalls in Gosport, Havant, New Forest, and Chichester. Meanwhile, some of the surpluses are very small (e.g. in Test Valley or Basingstoke and Deane).

- Southampton is a special case in that the 35% urban uplift applies to it. In theory it generates a large shortfall, of 3,224 dwellings (rather than a surplus of 1,755 were the uplift not applied). The shortfall is expressed as 0 because of government guidance to the effect that standard method should be accommodated within the 20 largest urban centres themselves.
- Some authorities, namely Test Valley and Waverley, are already planning to accommodate some unmet need, and their capacity to up targets to take on more may be limited (Waverley's delivery target includes half of Woking's unmet need – despite this it is now short of the district's own standard method by 123 dwellings per annum).

2.32 Focusing just on those authorities which border East Hampshire directly (Basingstoke and Deane, Hart, Waverley, Chichester, Havant, and Winchester), there is a net shortfall of 3,617 (shortfall of 6,607 from Waverley, Chichester, and Havant only partially offset by a surplus of 2,990 from Basingstoke and Deane, Hart, and Winchester). Extrapolated from a 13- to 19-year plan period this net shortfall becomes 5,286.

2.33 Havant is especially relevant, given:

- The significant scale of its unmet need; 2,603 dwellings for the 2023-2036 period on PfSH's estimates.
- As a coastal authority it has relatively few neighbours. Of these, Portsmouth and Chichester are already generating unmet need. Therefore its only immediate neighbours in a position to accommodate unmet need are Winchester and East Hampshire.
- Its location immediately to the south of East Hampshire. Bloor Homes Limited is seeking allocation of a site to the South of Horndean – i.e. to the very south of East Hampshire District, and well-positioned to accommodate unmet need from Havant.
 - Chichester also has significant unmet need (2,405 for 2023-2036) and most of its LPA is near the south of East Hampshire. Therefore a similar argument can be made that Horndean is highly suitable for accommodating some of this need.¹⁹

2.34 Havant's current local plan, adopted in 2011, included a housing target of 315 dwellings per annum (6,300 between 2006 and 2026).²⁰

2.35 An updated local plan was withdrawn from examination on the 16th of March 2022. This plan targeted 10,433 homes over the 2016-2037 plan period (497 per year, just below current

¹⁹ [Revised Local Development Scheme 2023-2026 - Appendix.pdf \(moderngov.co.uk\)](#) Map 2.1 shows that most of the northern two-thirds of Chichester falls into the SDNP, and most of its settlements are to the south of the Park.

²⁰ [download \(havant.gov.uk\)](#) Policy CS9 Housing



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standard method need).²¹ It was withdrawn following an Inspector's report which set out several concerns with respect to housing deliverability (for instance, the allocation of 900 new homes on Hayling Island raised congestion concerns, and the deliverability of hundreds of homes in Havant and Waterlooville Town Centres was also questioned), and concluded: '*our strong advice is that it would be better to withdraw the Plan, undertake the additional work and consult on it in line with the SCI, 2019 and then resubmit the Plan for examination.*'²²

- 2.36 Havant's emerging local plan notes a standard method requirement (516 at its time of writing) and outlines approaches to increasing housing delivery, including brownfield and greenfield development, reviewing the council's approach to housing density, bringing forward larger, more complex sites, and a 'stepped trajectory' for delivery. Nevertheless, it states that '*it is unlikely that the Borough will be able to address its housing need in full over the plan period. This will mean working with our neighbouring authorities to ask whether they are able to plan for additional homes over their own need.*'²³ Therefore it is highly likely that Havant will continue to generate significant unmet need.
- 2.37 Whilst we acknowledge that the precise extent of unmet need across East Hampshire's nearby authorities and its distribution are uncertain, and that as yet there is no agreed approach between LPAs to accommodating it, the existence and scale of this need weighs in favour of higher housing delivery in East Hampshire. Moreover, it is not clear where any dwellings surplus to the identified requirements will come from, as housing need is based on standard method, plus the small adjustment for unmet need from the SDNPA and the 10-15% buffer.
- 2.38 If sites come forward as planned, the buffer will represent dwellings surplus to identified requirement. If it is needed for its intended purpose, i.e. because some sites do not come forward, however, there will be less to attribute to unmet need from elsewhere in the sub-region. As discussed above, we do not feel that the indicated buffer supply is sufficient, so there may not be 'extra' delivery available to meet unmet need from elsewhere.
- 2.39 Therefore, the existence of unmet need in the sub-region suggests that housing need will be higher than that currently targeted, and this should be addressed in the Local Plan.

The housing requirement of the South Downs National Park Area

- 2.40 The technical note produced by Icení notes that between the Census years, population growth in the part of East Hampshire within the SDNP (the 'Park area') was much lower than that in the rest of the district (the LPA). Growth was 1.9% in the former and 11.5% in the latter; only 6% of population growth was in the Park area, which contained 27% of population in 2021.
- 2.41 A similar if less dramatic picture is shown for household growth (4.9% in the Park area, 14.2% in the LPA). In both cases the East Hampshire section of the SDNP grew more quickly than the rest of the National Park (in fact population and households declined elsewhere in the SDNP).
- 2.42 Icení argue that given these different demographic trends, to simply pro-rata standard method need for East Hampshire based on population would not be appropriate. They therefore:

²¹ [download \(havant.gov.uk\)](#) chapter DR1

²² [download \(havant.gov.uk\)](#)

²³ [download \(havant.gov.uk\)](#)



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- Develop an SDNP-wide trend-based population projection based on population growth between the 2011 and 2021 Census years (for which population figures are available at Output Area level, allowing for 'best-fit' estimates of the Park area and LPA to be made.²⁴
- Pro-rata this projection according to population within the SDNP – about 30% of which is in East Hampshire.
- Convert the population projection into a household projection using 2014-based household formation data.
- Apply an affordability uplift based on Land Registry data; estimated affordability ratio in the Park area was 14.56, above the 12.24 for the LPA.

2.43 This results in a household growth figure of 69 per annum, with the 66% affordability uplift taking housing need estimate to 114. This is consistent with an estimate of 350 dwellings per annum estimated in the SDNP HEDNA.

2.44 There is some room for error in this approach – for example the OAs do not precisely match up to SDNP boundaries; the pro-rata approach within the SDNP may lead to under- or over-estimation of growth within the Park area; the age breakdown of population within and without the SDNP may affect household sizes and therefore projections. Nevertheless, we accept that this is a broadly reasonable approach to dividing standard method need between the Park area and LPA.

2.45 Regarding unmet need, the Statement of Common Ground between South Downs National Park Authority and East Hampshire District Council notes that past delivery trends within the East Hampshire area of the National Park indicate about 100 dwellings per year. It is assumed that this will continue over the plan period, resulting in the unmet need of 14 dpa (266 over the plan period) included in the East Hampshire LPA's housing need.

2.46 Whilst a source for the historic delivery figure of 100 dpa is not provided, this is a reasonable approach to estimating future deliverability of housing in the Park area. If, however, delivery falls short of 100 dpa, the rest of East Hampshire may need to plan for more housing in order to meet the identified need.

²⁴ Methodology is covered in chapter 4 of the HEDNA produced for the SDNP. [SDNP-FInal-HEDNA.pdf \(southdowns.gov.uk\)](#)



3 Review of Evidence on Affordable Housing Need

3.1 Section 7 of the East Hampshire HEDNA focuses on affordable housing need. This section reviews the approach taken and the implications for overall housing need.

HEDNA approach to estimating affordable housing need

3.2 The approach taken in the HEDNA is summarised below:

- Current affordable housing need is estimated and annualised.
- Formation of households in need of affordable housing and numbers of existing households falling into need are estimated.
- Supply of existing affordable housing that will become available is estimated and deducted from the gross need to reach a figure for net need.

3.3 Estimated annual need by area of the district (the SDNP area and three others) and by rented and affordable home ownership is provided. This is summarised in Table 3-1 below, with non-SDNP areas combined and figures over the plan period included as well.

Table 3-1: Summary of affordable housing need estimates in HEDNA

	Annual			Plan period 2021-2040		
	Rented	Ownership	Total	Rented	Ownership	Total
LPA	198	222	420	3,762	4,218	7,980
Park area	99	94	193	1,881	1,786	3,667

Adapted from Affordable Housing Need: Summary in HEDNA

3.4 The methodology used to estimate affordable housing net need is a reasonable one. The chapter concludes, however, that *‘Despite the level of need being high, it is not considered that this would necessarily point to any requirement for the Council to increase the Local Plan housing requirement above that suggested by standard method’*.

3.5 We consider that this is not the case for two key reasons, which are considered in the following sub-section:

- The need to account for expected stock losses.
- Historic rates of affordable housing delivery.



Analysis of local affordable housing data

3.6 Stantec has analysed DLUHC data on gross affordable housing additions²⁵. Whilst ONS and Census data on stock analysed above gives a *net* change, it does not give the numbers actually built or converted on the one hand and demolished or sold (e.g. under Right to Buy) on the other. This can be estimated from the difference between net change and gross additions. The results of this are shown in Table 3-2. Note that these figures are for East Hampshire in its entirety, though we do not expect the relationship to be dramatically different between the Park area and elsewhere.

Table 3-2: Net change, additions, and losses (estimated) of affordable housing, 2011-2022

Net change	1,002
Gross additions	1,697
Losses	695
Net as % of additions	59%

Source: ONS, Census, Stantec analysis

- 3.7 DLUHC also provides data on all gross additions, affordable or otherwise, from 2012 onwards. Over the period 2012-23, gross affordable additions as a percentage of gross additions for all housing types stood at 26% in East Hampshire.
- 3.8 Policy H3 Affordable Housing of the draft local plan states that all developments of 10 or more dwellings or 0.5 hectares and over will be required to provide at least 40% of the net number of dwellings as affordable housing. Given a historic delivery rate of 26%, this is a highly ambitious target.
- 3.9 Therefore, as things stand for every 1,000 new dwellings delivered, 260 will be affordable. Of these 260 affordable dwellings, 153 (59%) will represent net additions, with 107 of the existing stock lost to sales or demolitions.
- 3.10 Whilst it may be possible to increase affordable housing delivery rates in future, or to somewhat reduce stock losses²⁶, even then it is highly unlikely that standard method housing delivery alone will meet the identified affordable housing need. This is illustrated in Table 3-3, which accounts for both stock losses and affordable delivery rates (both under Policy H3 and using historical delivery rates).
- 3.11 This demonstrates that given the identified affordable housing need of East Hampshire, stock losses, and plausible delivery rates, standard method housing delivery would be well under the level required to meet affordable need.

²⁵ [Live tables on affordable housing supply - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/live-tables-on-affordable-housing-supply)

²⁶ Though Right to Buy / Right to Acquire means that to a large extent these are inevitable, and purchasers of Shared Ownership properties will eventually be able to 'ladder' their way to full market ownership.



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3 Review of Evidence on Affordable Housing Need

Table 3-3: Housing delivery required to meet identified affordable housing need, 2021-2040

Area		LPA	Park area	Total
Affordable housing need 2021-2040		7,980	3,667	11,647
Net affordable additions as % of gross 2011-2022		59%		
Gross affordable additions required		13,514	6,210	19,723
Affordable housing delivery as % of total	Policy H3*	40%		
	Realised 2012-23	26%		
Total housing delivery required	Policy H3	33,784	15,525	49,309
	Realised 2012-23	51,975	23,884	75,859
Standard method**		9,082	1,900	10,982

Source: HEDNA, ONS, Census, Stantec analysis

* Shown as 40% for simplicity – as the requirement does not apply to smaller sites it would be slightly lower in reality

** Standard method after reallocation of some unmet need from the Park area to the LPA as per draft local plan



4 Conclusions

- 4.1 We agree with the finding in the HEDNA produced by Icenl that recent economic growth trends do not provide a rationale for increasing East Hampshire's housing need. Moreover, growth funding and strategic infrastructure projects (including Solent Freeport) do not provide such a rationale either.
- 4.2 The local plan states that a further 643 dwellings will be allocated as a 'buffer' to ensure flexibility. To meet the 10-15% benchmark, a further 265-719 should be allocated over the plan period.
- 4.3 The precise extent of unmet need in authorities around East Hampshire, and the capacity of other authorities to help address it, is uncertain. Nevertheless, it is clearly significant – building on evidence from Partnership for South Hampshire's Spatial Position Statement, we estimate that it stands at 11,033 dwellings for 2023-2036 (16,125 over a 19-year period).
- 4.4 Unmet need has not yet been accounted for in East Hampshire's local plan. The delivery 'buffer' may account for some of it, but its intended purpose is instead to allow for the possibility of some sites not coming forward as planned. Therefore, some unmet need from neighbouring areas should be accounted for explicitly.
- 4.5 In particular, Havant generates substantial unmet need, and is likely to continue to do so. The Horndean area is well-placed to take some of this need given its position in the south of East Hampshire.
- 4.6 The HEDNA approach to allocating standard method housing need between areas of East Hampshire inside and outside the SDNP is broadly reasonable, as is the assumed delivery within the Park area and therefore the unmet need allocated to the rest of the district.
- 4.7 The approach taken to estimating affordable housing need in the HEDNA is a robust one. We disagree, however, with the conclusion that it does not warrant increasing overall housing delivery above standard method.
- 4.8 Analysis of historic affordable housing stock losses (to demolitions or sales) and rates of affordable housing delivery as a proportion of total delivery suggests that much higher housing delivery would be required to meet affordable need.
- 4.9 Within the LPA (i.e. excluding the Park area), affordable housing need over the plan period is 7,980 dwellings. In the period 2011-2022, net affordable housing gains were 59% of gross affordable housing gains. On this basis, 13,514 gross affordable additions would be required.
- 4.10 Affordable housing delivery as a proportion of total stood at 26% over 2012-2023. This implies that delivering the identified requirement for affordable housing would necessitate total delivery of 51,975 dwellings. Assuming the local plan target of 40% affordable delivery is met, 33,784 dwellings would be required over the plan period – still significantly above standard method.



APPENDIX 2

HIGH LEVEL ASSESSMENT SITE REPORT

Site ref: LAA/RC-009	Site Name: Hazleton Farm South, Horndean					
SA Objective		Number	Score	Comments	Stantec Comments	Stantec Score
Objective 1	To protect, enhance and restore biodiversity across the East Hampshire planning area		-		EHDC have scored this objective as 'minor adverse effect'. The site has the ability to achieve biodiversity net gain, creation of high value habitats and retain the SINC.	+/-
1.1	Number of international ecological designations directly impacted by the site (SAC and SPA)	0				
1.2	Number of international ecological designations indirectly impacted by the site (SAC and SPA)	0				
1.3	Number of national ecological designations directly impacted by the site (SSSI, NNR and Ancient Woodland)	0				
1.4	Number of national ecological designations indirectly impacted by the site (SSSI, NNR and Ancient Woodland)	3		<i>Immediately adjacent to three areas of Ancient Woodland (including Forest of Bere and The Holt)</i>		
1.5	Number of local ecological designations directly impacted by the site (SINC, LNR and Priority Habitat)	20		<i>Blendworth Common SINC (north, including candidate amendment), 18 areas of priority habitat</i>		
1.6	Number of non-statutory network opportunity areas wholly or partially within site boundary	4				
1.7	Number of areas of additional green infrastructure within 50m of the site (National Forest Inventory Woodland England)	0				
Objective 2	To minimise carbon emissions and contribute to achieving net zero carbon emissions in the East Hampshire planning area		++		We agree with the scoring of this objective	++
2.1	Site accessibility score (taken from the Ridge Accessibility Study)	8				
2.2	Average broadband download speed available within the site	>30mbps				
2.3	Site falls wholly or partially within technical opportunity area for solar or wind energy (as defined by 2018 LUC Renewable and Low Carbon Study)	5				
2.4	Current land cover type and resulting emissions from land conversion to settlement	Rangeland - Medium				
Objective 3	To promote adaptation and resilience to climate change		--		EHDC have scored this objective as 'strong adverse effect'. The site is located in flood zone 1 and so has less than 0.1% chance of flooding from rivers over any year. The Government's surface water flood risk map shows the there is a risk of flooding in	0
3.1	Number of classifications of flood zone (flood zone 2 or 3) wholly or partially within the site	0				
3.2	Rating of "Groundwater Flooding Potential Areas" wholly or partially within the site	A, B, C				

					constrained linear positions that dissect the site. The Vision Document demonstrates that it is possible to deliver development on the site away from the areas at risk of surface water flooding. As such, a score of neutral effect is more appropriate.	
Objective 4	To promote accessibility and create well-integrated communities		--		EHDC have scored this objective as 'strong adverse effect'. It is not explained how this score has been derived -	+
4.1	Accessibility score of the site (Ridge Accessibility Study)	8			The site should be considered in the context of the outline planning permission to the northern boundary that is being delivered through allocation HN1 in the adopted Local Plan. The site will therefore benefit from a logical extension through linking new access points from the north. As such, a score of minor positive effect .	
4.2	Does the site fall within the most deprived areas in the East Hampshire planning area?	No				
Objective 5	To actively promote health and wellbeing across East Hampshire and create safe communities free from crime		+/-		EHDC have scored this objective as 'mixed effect'.	++
5.1	Number of existing areas of publically accessible open spaces within 800 m	3			The wider site will deliver a number of publicly accessible open space as shown in the accompanying vision document. These will be highly accessible through establishing new pedestrian /cycle links within the site and further afield. This will promote health and wellbeing encouraging the use of these local facilities. As such, a score of strong positive effect is more appropriate.	
5.2	Caring accessibility score of the site (Ridge Accessibility Study)	0.9				
5.3	Does the site fall within the most deprived areas in the East Hampshire planning area?	No				
Objective 6	To strengthen the local economy and provide accessible jobs and skills development opportunities for local residents		++		We agree with the scoring of this objective	++
6.1	Number of existing employment sites within 1,500 m of the site	5				
6.2	Number of town centres within 1,500 m of the site	1				
6.3	Does the site fall within the most deprived areas in the East Hampshire planning area?	No				
Objective 7	To protect and enhance built and cultural heritage assets in the East Hampshire planning area		0		We agree with the scoring of this objective	0
7.1	Number of nationally designated heritage features directly impacted by the site (listed buildings, registered parks and gardens, battlefields and scheduled monuments)	0				
7.2	Number of nationally designated heritage features indirectly impacted by the site (listed buildings, registered parks and gardens, battlefields and scheduled monuments)	0				
7.3	Number of locally designated heritage assets directly impacted by the site (historic parklands and conservation areas)	0				

7.4	Number of locally designated heritage assets indirectly impacted by the site (historic parklands and conservation areas)	0				
7.5	Number of heritage at risk features directly or indirectly impacted by the site	0				
7.6	Number of Hampshire County Council archaeology alerts wholly or partially within the site boundary	0				
7.7	Number of Hampshire County Council archaeology alerts buffer zones wholly or partially within the site boundary?	0				
Objective 8	To provide good quality and sustainable housing for all		++		We agree with the scoring of this objective	++
8.1	Residential yield	935				
Objective 9	To conserve and enhance the character of the landscape and townscape		-		EHDC have scored this objective as 'minor adverse effect'	+
9.1	Landscape capacity score of the site	Medium / Low			As identified within the accompanying Vision Document, the site has a wealth of opportunity to enhance the character of the landscape by creating a landscape-led development. The area to the south of the site will be preserved as public open space and provide a connection to the Havant thicket. As such, a more appropriate score is minor positive effect.	
9.2	Number of AONBs or National Parks within 2km of the site	1				
Objective 10	To support efficient and the sustainable use of East Hampshire's natural resources		+/-		We agree with the scoring of this objective	+/-
10.1	ALC provisional OR post-1988 Grades 1, 2, 3, or 4 wholly or partially within site boundary	4		<i>Two post-1988 (one Grade 4 and one Other) and two provisional (one Grade 3 and one Non-Agricultural)</i>		
10.2	Number of Source Protection Zones (SPZ) wholly or partially within the site boundary	5		<i>Zone 1, 1c</i>		
10.3	Number of historic landfills wholly or partially within the site boundary presenting opportunities for remediation	1				
10.4	Number of mineral designations wholly or partially within the site boundary, including mineral resource areas, mineral safeguarding areas and mineral consultation areas	0				
Objective 11	To achieve sustainable water resource management and protect and improve water quality in the East Hampshire planning area		--		EHDC have scored this objective as 'strong adverse effect'	0
11.1	Number of classifications of flood risk (flood zone 2 or 3, or Groundwater Flooding Potential Areas) wholly or partially within the site	1		<i>Groundwater flooding potential A, B and C</i>	The Government's surface water flood risk map shows the there is a risk of flooding in constrained linear positions that dissect the site. The Vision Document demonstrates that it is possible to deliver development on the site away from the areas at risk of surface	
11.2	Number of Source Protection Zones (SPZ) wholly or partially within the site boundary	5		<i>Zone 1, 1c</i>		

					water flooding. As such, a score of neutral effect is more appropriate.	
Objective 12	To minimise air, noise and light pollution in the East Hampshire planning area		-		EHDC have scored this objective as 'minor adverse effect'	-
12.1	Number of sources of noise, air and light pollution within 150 m of the site	2		<i>A3(M) and B2149</i>	As identified within the accompanying Vision Document, the impact of the A3(M) and B2149 can be sufficiently mitigated against. The site covers a large area and therefore it is possible to allow for a significant separation distance between these sources of noise and air pollution. As such, a more appropriate score is neutral effect .	

A butterfly with black and yellow wings is flying in the upper right corner of the image. The background is a soft-focus field of purple flowers under a warm, golden sunset sky. A large white circle with a thin gold border is centered on the page, containing the text.

HORNDEAN

VISION DOCUMENT

MARCH 2024

SITE LOCATION

REGENERATION OPPORTUNITY

The proposed development will benefit from and contribute to the wider economic regeneration of Solent Freeport, which includes the wider Portsmouth, Southampton and New Forest area through the provision of new homes for thousands of new workers.

The existing network of connections will ensure the site is well-linked to the wider region to reap benefits of this growth along with leisure, education and employment opportunities.





UNDERSTANDING THE PLACE

PROXIMITY TO NEW RESERVOIR

The proposed development will be located in close proximity to the proposed Havant Thicket Reservoir, which will provide 8.7 billion litre storage and safeguard water resources for the South East. The granted proposals include a visitor centre, an education centre, picnic and play areas along with opportunities for wildlife. The reservoir will create a permanent wetland with bird watching facilities. The site is planned to be fully open to the public from 2029.

ATTRACTIVENESS OF NATIONAL PARK

The development will benefit from an existing network of green spaces creating a sense of place and ample opportunities for leisure. The site borders South Downs National Park with various visitor opportunities, such as Stanstead Park Country House being located within close proximity. The Estate has historically significant links to the reign of James I and his subsequent escape being marked by Monarchs Way leading through Rowlands Castle. In addition, the site is located adjacent to Staunton Country Park and

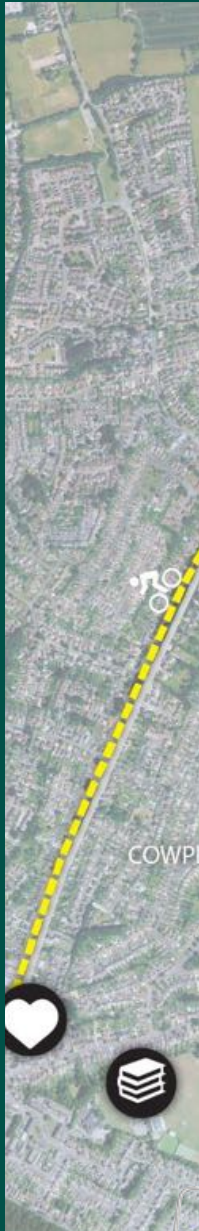
Havant Thicket, all providing direct regional walking and cycling trails within a 10min walk.















The surrounding landscapes will enable the development to sit in an attractive and natural setting. With woodland encompassing the site in all four directions, the development will have abundance of placemaking opportunities and a unique sense of place.

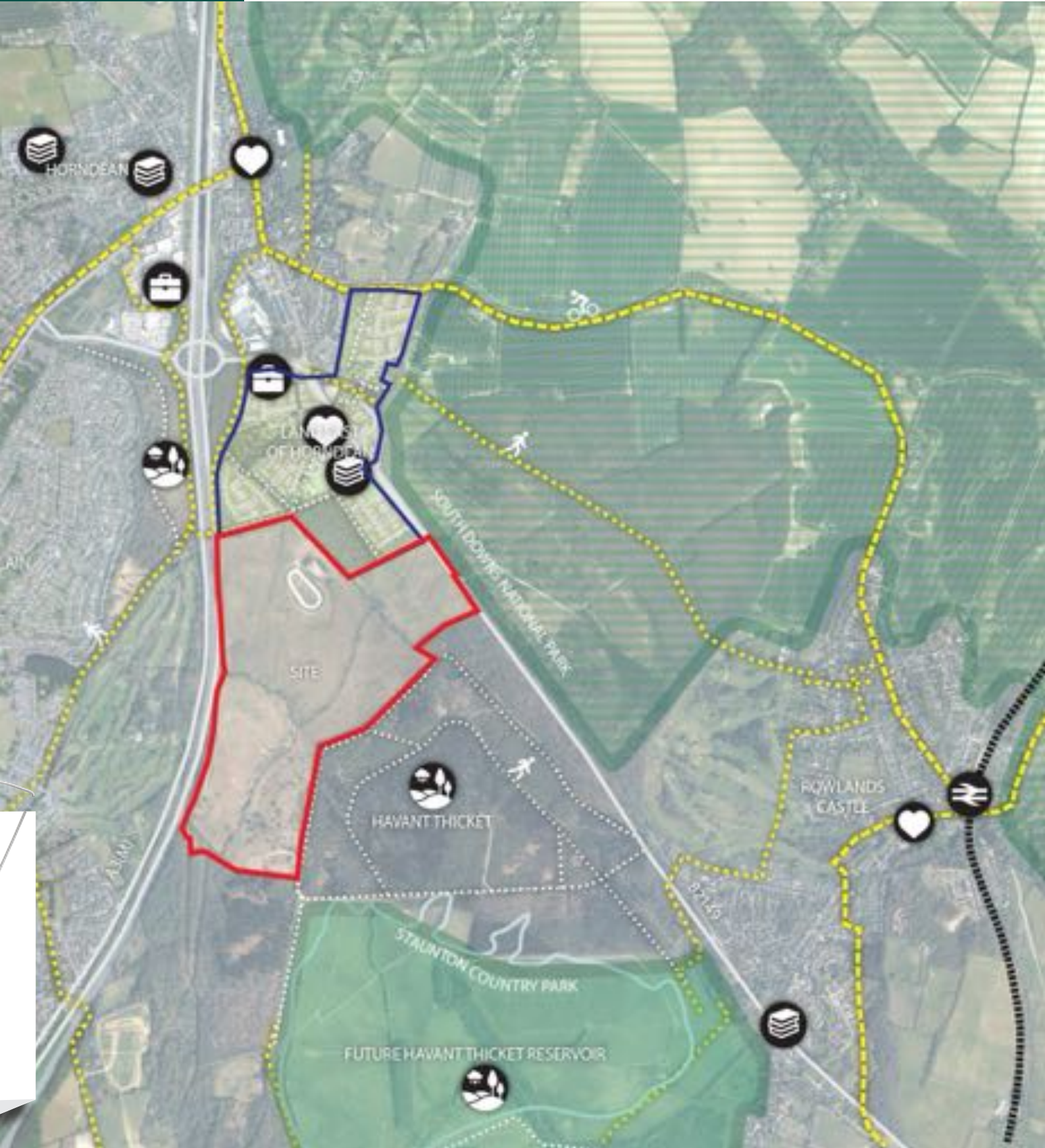
SUSTAINABLE GROWTH OF EXISTING BLOOR DEVELOPMENT

The development will form an extension to the existing proposals at Land to the East of Horndean creating shared benefits to both. The combined developments will form a complete network of high-quality pedestrian and cycle links, improving the regional connectivity between Horndean, Havant and Rowlands Castle with links to nearby services.

Not to mention, the combined sites will benefit from increased critical mass creating opportunities for co-location of community facilities and potential for improved public transport links.



	Development Site		National Park
	Land East of Horndean		Country Park
	Local Centre		PRoW
	Employment		Other Ped/Cycle Path
	Education		Railway
	Recreation		Main Road
	Railway Station		National Cycle Route

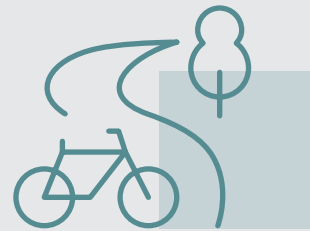


VISION FOR HORNDEAN

Horndean Extension Land will provide further sustainable growth to complete a self sufficient neighbourhood east of Horndean.

Leisure Opportunities and Attractive Public Open Spaces

Retention of existing natural features to connect to the wider network of ecological assets such as Havant Thicket, Future Havant Reservoir and South Downs National Park creating a healthy and attractive new development



Improved Connections

Extending and enhancing the existing pedestrian/cycle networks using attractive green network

Shared Vision

Co-location of new community facilities and logical expansion of the northern development



Local Facilities

Easily accessible and central facilities to support the growing community



Potential New Job Opportunities

Creation of new mixed-use areas to enhance the local employment offering



High Quality Homes

Creation of new homes to help meet East Hampshire Council's local housing need





A3M

Horndean

Land east of Horndean by Bloor Homes (outline application ref 55562/005)

B2149

Residential/
Employment

Potential
Community
Facilities

Waterlooville
Golf Course



INSPIRED BY THE LANDSCAPE



A general north-south axis has been established connecting Horndean to Havant Thicket via the combined Bloor developments to establish enhanced local connectivity



The area to the north, adjacent to the consented Bloor scheme will form a gateway space and establish an important intersection containing designated play opportunities and attractive landscaping around existing biodiversity.



A well-connected and attractive green grid connecting the immediate site uses, including residential, employment and community uses



A local square integrated with the green network reserved for community use to form a legible and attractive neighbourhood centre



The area to the south has been retained for wetland park uses connecting to Havant Thicket and reservoir, creating much wider recreation opportunities.



The public open space and pedestrian/cycle infrastructure distributed along the site edges linking to the surrounding woodland



LOGICAL EXTENSION OF BUILT FORM

The proposal will form a logical extension to the committed allocation to the north, on 'Land east of Horndean'. Bloor Homes has submitted reserved matters applications pursuant to the outline application in respect of the current allocation and these demonstrate the high-quality design coming forward. Bloor Homes is committed to following the high-quality design and place making principles established into the expansion land development; as a consequence, there will be a natural synergy between the allocation and proposed expansion land, which will invoke a strong sense of place and community and create a welcoming and attractive environment for residents.





Land East of Hornbeam



BENEFITS FOR ALL



A logical extension to the allocated and consented development north-east of Horndean



Improved connections to the local facilities for new and existing communities



Contributing towards the health and wellbeing of the local community by encouraging walking and cycling to the nearby recreation facilities



Enhancing local biodiversity by closely incorporating and protecting surrounding site assets into the design and creating biodiversity areas



Creating new employment opportunities and community assets locally to benefit the new and existing communities



An economic boost to the wider area



Providing much needed local and affordable housing to address the housing shortage



Potential car parking and visitor facilities to support those visiting Havant Thicket



Improving local recreation offering through establishing new pedestrian/cycle links to the South Downs, Havant Thicket and Staunton Country Park from Horndean via a network of attractive greenways



Addressing the climate emergency through sustainable low carbon development to minimise the impacts on climate change



BLOOR HOMES[®]



From: [REDACTED]
Sent: 06 March 2024 12:40
To: [EHDC - Local Plan](#)
Subject: Reside Developments Ltd - File Transfer: East Hampshire District Council Local Plan Regulation 18 (Part 2) Consultation (Sent on behalf of [REDACTED] - Headley Road, Liphook

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.

Project: 333100919 **Headley Road, Liphook**

Notification about File Transfer **East Hampshire District Council Local Plan Regulation 18 (Part 2) Consultation (Sent on behalf of Ed Hanson)**

Remarks

[REDACTED]
Dear Sir/Madam

East Hampshire District Council Local Plan Regulation 18 (Part 2) Consultation.

Please find attached a representation submitted on behalf of Reside Developments Ltd in respect of Land West of Headley Road, Liphook.

I trust this information is of use. Should you require anything further, please do not hesitate to ask.

Your faithfully

[REDACTED]

[Download all files](#)

File Transfer Info

To: localplan@easthants.gov.uk

CC: [REDACTED]

Purpose: **For Your Information**

Expiration Date: **05/04/2024**

Transferred Files

240306 FINAL EHDC Regulation 18 Reprs.pdf	06/03/2024	12:14	14,315 KB
Transmittal - 00001.pdf	06/03/2024	12:39	85 KB

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East Hampshire Draft Local Plan

Land West of Headley Road, Liphook
Regulation 18 (Part 2) Representations

On behalf of **Reside Developments Ltd**

Project Ref:333100919 | Date: 28 February 2024

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Document Control Sheet

Project Name: Land West of Headley Road, Liphook

Project Ref: 333100919

Report Title: East Hampshire Draft Local Plan - Regulation 18 (Part 2) Representations

Doc Ref: 333100919/A3 LP Reg 18 Reps

Date: 6 March 2024

	Name	Position	Signature	Date
Prepared by:				22 Feb 24
Reviewed by:				28 Feb 24
Approved by:				6 March 24
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved
FINAL	6 March				

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

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5	Site Assessment/Allocation	8
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Appendices

Appendix 1	Illustrative Layout Prepared by ECE Architecture (Reference: SK-04)
Appendix 2	Open Space Plan Prepared by ECE Architecture (Reference: SK-05)
Appendix 3	Highways Technical Note Prepared By Motion January 2024
Appendix 4	Road Traffic Noise Assessment Prepared By Hepworth Acoustic January 2024
Appendix 5	Vision Document Prepared By ECE Architecture March 2024

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1 Introduction

- 1.1 These representations are submitted on behalf of Reside Developments Ltd (Reside) in respect of the East Hampshire Draft Local Plan (DLP) 2021-2040 Regulation 18 consultation.
- 1.2 Reside is a multi-disciplined company established in 2004 and operating out of Dorking, with a vested interest in ensuring that the future needs of the local community are met in a sustainable manner.
- 1.3 Reside control some 1.6 ha of land on the edge of Liphook to the west of Headley Road, Liphook ('the Site'). The Site benefits from a draft allocation for 20 dwellings in the DLP under policy LIP02 (LAA/SA reference: LIP-012). Reside has sought to proactively and positively engage in the preparation of the DLP, including through the early stages of the Regulation 18 (Part 1) Issues and Priorities January 2023.
- 1.4 Reside also engaged in the preparation of the Bramshott and Liphook Neighbourhood Development Plan ('BLNP') and met with the Parish Council. In January 2024 and following changes made at Regulation 14 Stage, the Parish approved the BLNDP for submission to EHDC. The BLNP does not allocate new housing sites.
- 1.5 Whilst Liphook has seen housing growth in recent years, delivery and supply in the District has fallen short of identified need and has led to worsening affordability. BLNDP draft Policy BL2 (Meeting Local Housing Needs) states that Liphook requires 50 affordable dwellings per annum, or 950 between 2021 - 2040.
- 1.6 The DLP allocates land to deliver c. 20 homes at Headley Road and a total of 111 homes in Liphook. The Settlement is Tier 2 and the DLP evidence base, including the Housing Needs Assessment (HNA) 2021, forecasts a residual need for 950 affordable homes (equating to 2,375 new homes) in Liphook over the plan period to 2040. Without the allocation of additional dwellings, the DLP will not provide for the housing needs and requirements of Liphook or the District, particularly affordable.
- 1.7 Reside supports the allocation of Land at West of Headley Road, Liphook to accommodate new homes (DLP Policy LIP02) but considers that it can make a greater contribution to housing requirements. Reside has undertaken technical assessments that confirm the deliverability of the site and the capacity. These have informed the updated Illustrative Layout SK-04 (Appendix 1) that shows how the 1.6ha site can comfortably accommodate 35 dwellings whilst meeting all policy and infrastructure requirements, including BNG and SANGs.

- 1.8 The updated layout has been informed by work including a review of the access from Headley Road, updated noise impact analysis and agreement of ecological matters with Natural England.

- 1.9 These representations demonstrate that the Land at west of Headley Road is suitable, available and deliverable.

2 Spatial Strategy

Part A, Chapter 3 Managing Future
Development
Policy S1 Spatial Strategy
Policy S2 Settlement Hierarchy

Spatial Strategy

- 2.1 Based on the current outputs of the standard method (2023), a minimum of 10,982 homes are required across the district (including the South Downs National Park) during the plan period (2021-2040). This is equivalent to 578 homes per annum. However, when the South Downs National Park is disaggregated, the remaining need equates to 464 homes per annum / 8,816 homes over the plan period.

- 2.2 The South Downs National Park Authority will calculate local housing needs for its area, although Reside note the total unmet needs of neighbouring authorities is currently ‘unknown’ and given the high landscape sensitivity of the South Downs, it is likely EHDC will need to accommodate substantial unmet need. However, only 14 dwellings have been accounted for from the South Downs National Park and none from other neighbouring authorities. This is a highly conservative approach and results in DLP Policy S1 providing for just 478 homes per annum / 9,082 homes over the plan period.

- 2.3 Paragraph 60 of the NPPF 2023 states that *‘to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed’*, The DLP does not currently do enough to boost the supply of homes. Furthermore, the most recent calculation of five year housing (Five-Year Housing Land Supply Position Statement Addendum February 2024) reveals a shortfall (4.74yrs) and EHDC should be planning for more homes.

- 2.4 Windfall assumptions represent 1,320 homes over the plan period (70 per annum). The Windfall Allowance Update Paper (October 2023) at paragraph 4.4 states *‘The percentage of dwellings coming forward as windfall in relation to overall completions has decreased since 2011 as more sites were known to the local planning authority and identified in Land Availability Assessments and/or formed part of any Local Plan/Neighbourhood Plan allocations.’* The DLP assumes a similar rate of windfall allowance when compared to the previous 15 years of monitoring. This

appears unrealistic given the ever-decreasing number of windfall sites available or identified in the land assessments.

Settlement Hierarchy

- 2.5 Liphook was identified as a Tier 3 settlement (Large Local Centre) in the Core Strategy 2015. The DLP evidence base (Revised Settlement Hierarchy Background Paper January 2024) reclassifies Liphook as a Tier 2 settlement (alongside Horndean, Whitehill & Bordon) only behind Alton which is Teir 1. Reside supports this classification.

- 2.6 Liphook is a well-established town that provides services and facilities to a number of smaller villages and parishes within its vicinity and is befitting of a wider strategic role in the settlement hierarchy of the County. The settlement provides employment opportunities and from a retail perspective ‘The Square’ is classified as a Tier 2 District Centre (DLP Policy E5).

- 2.7 Liphook has seen a reduction in the number of homes apportioned to it in relative terms compared with the Joint Core Strategy 2015 and this reduction is not evidenced. Liphook is a sustainable location, at the top of its Tier and it is important that the DLP identifies sufficient housing to allow the town and the community grow.

- 2.8 The enclosed Illustrative Layout for Land West of Headley Road shows that the Site can accommodate at least an additional 15 homes above the 20 provided for in the draft allocation without increasing the size of the allocation and continuing to align with the target housing mix. This would allow Liphook to accommodate additional homes, taking a more appropriate proportion of the housing requirement and reinforcing its strategic role to the benefit of its residents, in a sustainable manner. The site is suitable, available and achievable.

3 Housing Need

Part C, Chapter 9 Homes for All
Policy H1 Housing Strategy
Policy H2 Housing Mix Type
Policy H3 Affordable Housing

3.1 The Part 1 Regulation 18 DLP confirmed that the Standard Method would be used as a starting point / minimum housing requirement for the District. The Regulation 18 Part 2 DLP and evidence base now being consulted upon have taken the Standard Method as the requirement, with no uplift. The figure is also disaggregated with the South Downs National Park and no assumptions have been made regarding unmet need from other neighbouring authorities. This results in a requirement of just 478 homes per annum / 9,082 homes over the plan period. This is substantially below the current Core Strategy (2015) figure of 592 dwellings per annum (10,060 dwellings between 2011-2038).

Housing Needs Assessment

3.2 A Housing Needs Assessment (HNA) 2021 was undertaken by AECOM to inform the BLNDP. This is particularly helpful as it assessed housing needs at a localised base. Given the focus on self-containment of settlements and benefits around reduced vehicle trips etc, considering needs at this more refined level is increasingly appropriate.

3.3 A key objective of the BLNDP is to increase the number of affordable homes. However, owing to a decision taken at the NP steering group meeting on 14th February 2023, it was decided not to allocate sites in the BLNDP and to take forward a policies only plan. The decision was made because the steering group *‘did not want to risk significant successful planning applications without an NDP in place to ensure quality development that meets local need’* (Parish Website Neighbourhood Plan – About the NDP)

3.4 Turning to affordable housing need, the evidence that supports the BLNDP identified a need for 50 new affordable homes per annum or 950 over the plan period. On the basis of a 40% affordable housing requirement (DLP Policy H3) 2,375 new dwellings are required in Liphook over the plan period to meet identified needs.

3.5 The HNA concludes that *‘the estimated affordable housing delivery based on EHDC emerging plan does not meet the quantity of demand identified in estimates of the need for affordable housing’*. In addition, the HNA concludes that *‘a calculation based on the Interim HEDNA*

suggests a total need for 50 affordable homes per annum (18 affordable rented homes and 32 affordable ownership homes) or 950 (predominately for affordable ownership) homes over the plan period. This exceeds the overall indicative housing figure for the NA suggesting some form of prioritisation will be required i.e. social / affordable rented homes to meet acute needs. Data from EHDC suggests there are currently 120 households on the affordable housing register. It would be beneficial to frontload any future Affordable Housing provision to meet those needs as soon as possible’.

- 3.6 The DLP is proposing allocations at Liphook that would deliver c. 111 additional homes. In line with the 40% affordable homes target in DLP Policy H3, this would equate to c. 44 affordable homes over the Plan period. This represents just over 5% of the needs identified through the preparation of the BLNDP.
- 3.7 An increase of 15 dwellings delivered at Land West of Headley Road would result in an additional 6 or 7 affordable dwellings in Liphook.
- 3.8 Demand for property in Liphook is clearly high. Failing to increase the supply of housing in the settlement will see house prices remain high and likely increase over the Plan period. The low number of new homes being proposed through the Local Plan will not only fail to meet evidenced need at the local level, but will see the notable shortfall in affordable housing in the Town continue and worsen.
- 3.9 The DLP and its evidence base should acknowledge the actual need for new homes in the town/ local area and be clear that the quantum of homes distributed to Liphook is based on current land availability and capacity thereof, with a review of the capacity of sites based on technical assessment.
- 3.10 The above demonstrates a strong need and compelling reason to optimise delivery of new homes on all suitable, available and achievable land in and around Liphook. The capacity of the draft allocations should therefore be optimised. As can be seen from the below/ attached, the Land at Headley Road can provide at least 15 more homes than the draft allocation suggests.

4 Green Places

Part B, Chapter 4
Policy NBE3 – Biodiversity Net Gain
Policy CLIM2 – Climate Change

- 4.1 Biodiversity Net Gain (BNG) became mandatory from 12 February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as amended) (as inserted by Schedule 14 of the Environment Act 2021), accompanied by a suite of regulations and national guidance. This sets out the requirements and processes in respect of BNG. There is no need for the DLP to duplicate the national, legislative requirements in draft Policy NBE3 (particularly point a).
- 4.2 Policy NBE3 states that development will only be permitted where a measurable BNG of at least 10% is demonstrated and secured in perpetuity (for at least 30 years). In light of current national policy, Reside raise no objection to the 10% figure.
- 4.3 Policy CLIM2.1 requires all new development to demonstrate how they addresses the climate emergency. Reside supports the principle of this policy and the use of renewable energy where possible. However, the policy introduces a series of requirements which in combination appear onerous, particularly for smaller developments, where the expectation is to generate at least the same amount of renewable energy on-site as the annual electricity demand for the operational energy of new homes. Reside request that further consideration is given to the viability of this policy for sites under 50 homes.

5 Site Assessment/Allocation

Part D, Chapter 12 Site Allocations
Policy LIP02 Land West of Headley Road
Policies Map

- 5.1 Reside has undertaken technical assessments and surveys relating to the on-going promotion on the Site. Assessments relating to noise impact, landscape, ecology, drainage/ flood risk and transport/ access were undertaken between 2014-15 and have been updated to support promotion of the Site through the Draft Local Plan. This has culminated in a revised draft layout included at Appendix 1 and within the Vision document at Appendix 5).
- 5.2 Reside first promoted the Site for development in 2014 and an outline planning application (EHDC ref: 52669/002) was submitted in Autumn 2015. The scheme included up to 36 dwellings with access in detail and all further details reserved. The application was refused on 16 February 2016 for two reasons.
- 5.3 The first reason related to the Site not benefiting from an allocation in the 2015 Core Strategy and falling outside of the defined settlement boundary. The second reason was because a section 106 agreement had not been completed at the point of determination, which it could not be as the application of refused. Neither stand now. Whilst the application was refused on the grounds that the Site is located in the countryside (ie outside of the settlement boundary) where justification is required to demonstrate a proven need for proposed housing, no ecological, flooding or highways issues were raised by statutory consultees, where these matters were addressed through the submission of a Phase 1 Habitat Survey Report, a Flood Risk Assessment and a Transport Statement. This list of supporting documents is not exhaustive, and all other submitted reports confirmed no technical issues associated with development of the Site for up to 36 dwellings. The current Layout shows how the 1.6ha site could deliver up to 34 dwellings.
- 5.4 An Open Space Plan (ref: SK-04) (Appendix 2) has also been prepared which shows that appropriate provision for open space can be made within the site boundary. In total 0.48ha will be dedicated to open space, which equates to 30% of the total site area. In addition, Natural England (NE) has previously provided advice on various mitigation solutions and Ecology Solutions, the ecology consultants for this scheme, met with NE in August 2022 to discuss the options for proposed mitigation further. The sites at both Radford Park and Iron Hill have been identified as very tangible and deliverable opportunities in terms of mitigation.

- 5.5 The mix of homes that has informed the Illustrative Layout has been taken from the Housing Economic Development Needs Assessment (HEDNA) 2022 and HNA 2021. With respect to housing size the HNA states that the overall balance tends to be '*weighted towards medium to large size homes (five rooms or more)*'. However, one notable change since the last census is the proportion of three and four room dwellings increased at a higher rate compared to the comparator geographies, suggesting that newer homes have been relatively small. Bramshott and Liphook's stock of dwellings by size in terms of bedrooms is similar to that of East Hampshire as a whole, with a majority having three bedrooms.
- 5.6 This has resulted in the greatest number of homes being three-bedrooms across tenures. Having regard to the HEDNA, a more equal number of two-bedroom and three-bedroom homes are provided for, with the greatest number of market homes being provided as three-bedroom. The Illustrative Layout demonstrates how 35 homes can be comfortably accommodated without increasing the size of the Site compared to 20 homes and maintaining the dwelling size mix as per the HEDNA. In short, this allocation could deliver a higher number of homes in an acceptable manner, in compliance with policy.
- 5.7 DLP Policy LIP02 notes the Infrastructure Requirements as follows:
1. *Education: No specific requirements identified at this stage.*
 2. *Health: Developer contributions (e.g. by a s.106 contribution) would be required towards projects to increase capacity at Liphook Village surgery.*
 3. *Access: A vehicular access point onto the Headley Road and new walking and cycling infrastructure and connections would be necessary to support development. A new crossing point on Headley Road is likely to be required.*
 4. *On-site drainage: the site has been identified as highly compatible with infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate flood risks on Headley Road.*
 5. *Cumulative pressures of development on local infrastructure will be dealt with via CIL.*
- 5.8 To support the updated Layout, Reside commissioned Motion to undertake a Technical Update Note which is included at Appendix 3. The note confirms that the access junction design is acceptable in design terms. Vehicle speeds past the Site are unlikely to have materially changed since 2015 and therefore visibility splays will fall within either the Site or highway land as demonstrated within the previous outline application. Traffic impact was negligible previously and this has not changed.
- 5.9 An updated Traffic Road Noise Assessment prepared by Hepworth Acoustic is included at Appendix 4. The assessment confirms that the current layout can be accommodated without impacting on the amenity of future residents.

Land Availability Assessment

- 5.10 The Council published their Land Availability Assessment (LAA) in December 2018, which at that time formed part of the evidence base for the Draft Local Plan. Within the 2018 LAA, the Site was identified as a ‘Developable’ Site (Site Ref. LIP-012) for between 36 -40 dwellings. This capacity mirrored that presented in the 2015 planning application.
- 5.11 More recently, the Council have published an updated LAA (2021 and 2023), which again identifies the Site as ‘included’ (i.e., developable / deliverable). However, the Site capacity has been arbitrarily reduced to 20 dwellings; there is no supporting text or evidence to explain the reasoning for the reduction.
- 5.12 All ‘included’ LAA sites were further considered through the Sustainability Appraisal (SA).

Sustainability Appraisal Review

- 5.13 An Integrated Impact Assessment (IIA 2023) has been undertaken alongside the DLP which brings together the requirements of the Statutory SA process, incorporating the Strategic Environmental Assessment (SEA) Regulation with the requirements of Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA)
- 5.14 Drawing together the above and having regard to the Illustrative Layout informed by the various technical assessment, it is evident that Land West of Headley Road can accommodate the full requirements of the emerging allocation (Policy LIP02) as a minimum. Moreover, the increase in the number of new homes would positively alter the current score of the site in the IIA 2023. In light of the technical work undertaken to update the Illustrative Layout, the IIA 2023 scoring is no longer justified/ evidenced.
- 5.15 Both housing (IIA Objective 8) and Landscape (IIA Objective 9) should be ‘*major positive*’. Further examples of Objectives that should be attributed higher scores include climate change adaption and accessibility.
- 5.16 We consider that the biodiversity effects (IIA Objective 1) would likely be ‘*minor positive*’ and capable of being easily mitigated. Moreover, landscape analysis assesses landscape impacts (SA Objective 8) specific to the site and concludes that there is extremely limited visibility of the site making it capable of accommodating built development that is well integrated within the landscape and townscape setting.

- 5.17 The Site scores above average in the Accessibility Study 2023 and could be integrated with Liphook by extending existing pedestrian infrastructure along Headley Road. It is within walking and cycling distance of local services and facilities on Headley Road. The Accessibility Score (IIA Objective 4 should therefore be 'minor positive'.
- 5.18 Based on the above, the scheme and supporting evidence, the sustainability score of the site should be notably higher and the SA ought to be revisited on this basis.

Deliverability

- 5.19 The development is achievable and can be delivered in the short term so offering an immediate contribution to the Council’s housing supply issues.
- 5.20 The site is suitable, available and achievable. There are no technical impediments to delivery and no reliance upon third party land. In terms of the rate of delivery, Reside anticipate start on site 9 months from approval of a full application, completion of the first unit 9 months from start on site, and completion of all units 12 months from this. A planning application is in preparation and will be submitted in tandem with the preparation of the next stage of the local plan.
- 5.21 In line with the technical assessments set out above, Reside is not aware of any technical aspects that will delay the Site coming forward. Reside has a land contract in place for a considerable length of time, so the Site is deliverable.

Site Allocation Review

- 5.22 Reside supports the allocation of Land West of Headley Road for residential development. The enclosed Illustrative Layout and supporting technical reports show how the emerging allocation (Policy LIP02) can be accommodated within the site whilst addressing the infrastructure and mitigation requirements as outlined in the draft policy.
- 5.23 The principal change Reside wishes to see to emerging Policy LIP02 is to the number of homes the site can deliver to reflect the evidenced need for additional homes in the Town and the capacity work undertaken to inform the Illustrative Layout.
- 5.24 The requested changes are as follows (shown as tracked changes):

Policy LIP02

Land west of Headley Road,
Liphook LAA Reference LIP-012
Site Size (Ha) 1.6 ha Existing Use Agriculture Proposed Future Use Housing
Proposed Number of Homes ~~20~~-35

6 Summary

- 6.1 Land West of Headley Road, Liphook is controlled by Reside and is confirmed as available for development.
- 6.2 These representations demonstrate that Land West of Headley Road, Liphook is a suitable location for housing development, and that the terms of emerging allocation Policy LIP02 can be met, as a minimum, without compromising any part of the policy requirement.
- 6.3 Resides' representations, that are expressed as a technical objection to the emerging Local Plan, can be summarised as follows:
- I. Spatial Strategy – additional homes should be distributed to Liphook to meet identified need and assist with the recognised and evidenced affordability issues and to contribute to wider need including the shortfall (or unassigned) disaggregated from the SDNP.
 - II. Sustainability Appraisal – the site assessment, and appraisal against SA objectives, for Land at Headley Road should be updated to reflect the site credentials outlined.
 - III. Policy LIP02 Land West of Headley Road – site allocation to be updated to provide for a higher number of homes (at least 35).
- 6.4 Reside welcomes the opportunity to continue to engage in the DLP, specifically at Regulation 19 stage. Should the council wish to progress a statement of common ground relating to the emerging allocation for Land West of Headley Road, Reside would be pleased to discuss this.

**Appendix 1 Illustrative Layout prepared by ECE
Architecture (Reference: SK-04)**

CDM 2015 Health & Safety Information

This information relates only to 'Significant Hazards' identified on this drawing and is to be read in conjunction with the Designer's Hazard Register.



Rev	Date	Revision Details	Dr	Ch
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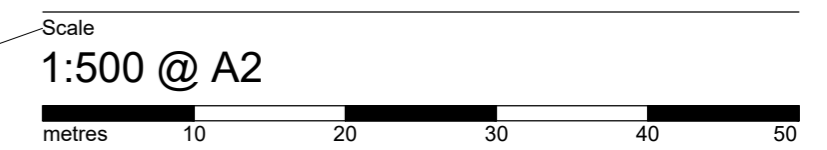


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Client's Name
Reside Developments

Job Title
**Land to the West of Headley Road,
Liphook**

Drawing Title
Site Plan - 35 Dwellings



Drawn	Checked	Date
JY	AK	29.02.2024

Job No	Drawing No	Rev
6671-LI	SK-04	-

Status
PRELIMINARY

N
SITE PLAN

Appendix 2 Open Space Plan Prepared by ECE Architecture (Reference: SK-05)

CDM 2015 Health & Safety Information

This information relates only to 'Significant Hazards' identified on this drawing and is to be read in conjunction with the Designer's Hazard Register.



Open Space		
●	Formal Open Space	769 sqm
●	Informal Open Space	3859 sqm
●	Landscaping Buffer	838 sqm
Total		5466 sqm
Site Area = 15,242 sqm		
Open space = 35.8% of site area		

Rev	Date	Revision Details	Dr	Ch



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Client's Name
Reside Developments

Job Title
Land to the West of Headley Road, Liphook

Drawing Title
Site Plan - Open Space

Scale
1:500 @ A2

Drawn	Checked	Date
JY	AK	29.02.2024

Job No	Drawing No	Rev
6671-LI	SK-05	-

Status
PRELIMINARY



**Appendix 3 Highways Technical Note Prepared
by Motion January 2024**

Highways Technical Note

Site: Land to the West of Headley Road, Liphook
Prepared by: DM/DR
Approved by: DM
Date: 23 February 2024

1.0 Introduction

- 1.1 This technical note has been prepared on behalf of Reside Developments Ltd. in respect of land to the west of Headley Road, in Liphook. It is proposed to bring forward a residential scheme at the site, with access onto Headley Road.

2.0 Planning History

- 2.1 An outline planning application was refused in 2015 for 36 residential units and associated open space, landscaping, access and car parking. All matters were reserved with the exception of the point of access. Vehicular access to the site was proposed via a simple priority junction at the north east corner of the site.
- 2.2 Whilst the scheme was refused, Hampshire County Council (HCC), acting as the highway authority, did not raise any concerns in respect of access design and traffic impact, subject to appropriate conditions. On this basis it is considered that provided no notable changes occur in respect of quantum of development or access junction location then the principle of development in respect of highways should still be acceptable. This is subject to demonstrating compliance with current planning policy guidance, both at a local level and at a national level.

3.0 Access Arrangements

- 3.1 Access to the development site was previously proposed via a new priority junction at the north-east corner of the site onto Headley Road. This involved the provision of a simple priority junction, with a pedestrian footway measuring 1.8 metres in width that would run along the western side of Headley Road in the vicinity of the access. The proposed footway would connect with the existing footway along Headley Road to the north, whilst to the south will provide dropped kerbs and tactile paving to enable pedestrians to cross Headley Road.
- 3.2 The drawing attached as **Appendix A** illustrates an almost identical access arrangement as previously proposed. On the basis the access junction was deemed acceptable previously, it is expected that HCC will form the same view as part of any new application since general design guidance in respect of access design has not changed.
- 3.3 As part of the previous application two Automatic Traffic Counters (ATC's) were laid for a full 7 day period to assess speeds along Headley Road, with 85th percentile speeds recorded in both directions. Resultant visibility splays were provided as per guidance contained within Manual for Streets (MfS), and are shown within the above drawing. Suitable visibility splays could be accommodated on Headley Road in both directions within either highway land or land under the control of the client.
- 3.4 Vehicle speeds will not have changed notably along a road of this nature as traffic flow is unlikely to have changed materially. Any new application would be supported by appropriate speed surveys, albeit it is not anticipated that the requirement will change. Therefore, visibility would remain either within highway land or the site and not affect third party land.

4.0 Parking/Traffic Impact

- 4.1 Parking on the site will be provided fully in accordance with relevant parking standards. As the development proposals were previously brought forward as part of an outline planning application (other than access), commentary on internal layout aspects and parking were not discussed. However, parking requirements in Hampshire have not changed notably since 2015, whilst the previous scheme was able to show sufficient parking provision on site to cater for the needs of the development.

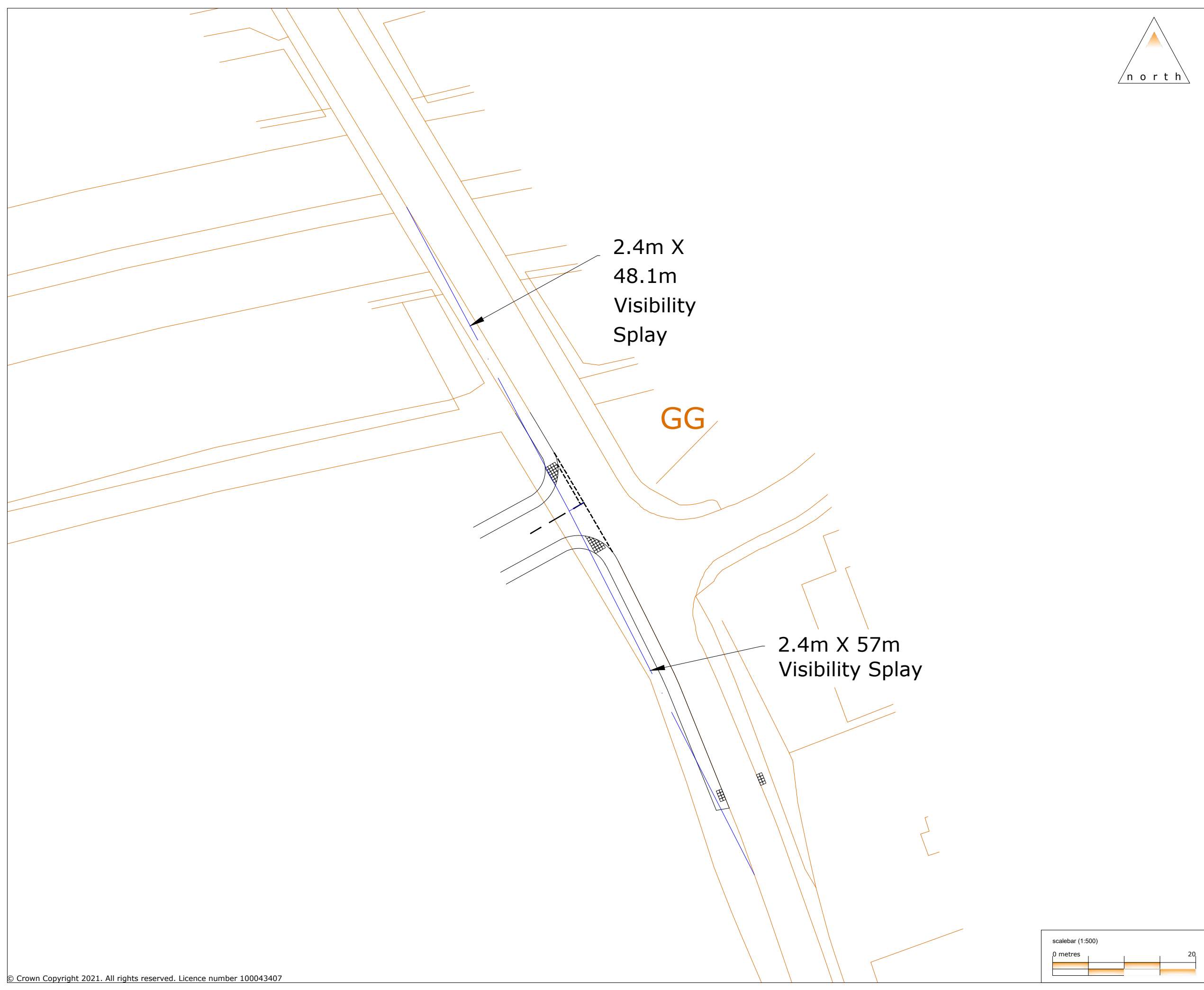
- 4.2 The previous scheme demonstrated that the proposals could result in up to one additional vehicle every 90 seconds during the weekday peak hours, which is considered immaterial. Whilst the TRICS database will have been updated since the previous application was submitted, it is not likely to alter the levels of traffic flow materially. It is likely that HCC will view the impact of the development in a similar manner to the previous application.
- 4.3 No junction modelling was required previously, and as development related traffic flow will be low, it is not expected that the scope of off-site assessment work will change.

5.0 Summary

- 5.1 In summary, it is not expected that the highway related work required to support any forthcoming planning application would differ materially from the previous scheme in 2015. Access and quantum of development will not change, and therefore the access junction design should still be acceptable in design terms. Vehicle speeds past the site are unlikely to have materially changed and therefore visibility splays will fall within either the site or highway land as demonstrated within the previous scheme. Traffic impact was negligible previously.

Appendix A

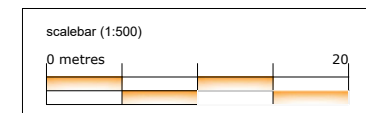
Proposed Access Arrangements



2.4m X
48.1m
Visibility
Splay

GG

2.4m X 57m
Visibility Splay



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Project:	Headley Road, Liphook
Title:	Proposed Site Access Design & Visibility Splays
Client:	Reside Holdings Ltd
Drawing Status:	
Scale:	1:500 (@ A3) Date: 20/02/24
Drawn:	DR Checked: DM Approved: DM
Drawing:	1906050-01 Revision:

Appendix 4 Road Traffic Noise Assessment
Prepare by Hepworth Acoustic
January 2024

**PROPOSED RESIDENTIAL DEVELOPMENT AT
LAND TO THE WEST OF HEADLEY ROAD, LIPHOOK**

ROAD TRAFFIC NOISE ASSESSMENT

On behalf of:
Reside Developments Ltd

**PROPOSED RESIDENTIAL DEVELOPMENT AT
LAND TO THE WEST OF HEADLEY ROAD, LIPHOOK**

ROAD TRAFFIC NOISE ASSESSMENT

Report prepared by:
Hepworth Acoustics Ltd
1st Floor Aztec Centre
Aztec West
Almondsbury
Bristol
BS32 4TD

On behalf of:
Reside Developments Ltd



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1.0 INTRODUCTION

- 1.1 Hepworth Acoustics was commissioned to carry out a noise assessment relating to a proposed residential development at a site known as Land to the West of Headley Road, Liphook. The noise assessment was requested to evaluate road traffic noise from roads adjacent to the development land.
- 1.2 The site is bounded by the B3004 Headley Road to the east, by an existing large residential property to the south, by Lowsley Farm Nature Reserve to the west and southwest, and by the A3 Liphook-Petersfield Bypass to the north.
- 1.3 Headley Road is a moderately trafficked local route and is at grade with the site. The A3 is a dual-carriage trunk road and is in a substantial cutting relative to the site.
- 1.4 The site itself is currently an open field. The site is generally flat, albeit with a gentle slope upwards from east to west.
- 1.5 A plan showing the site location is provided in Figure 1.
- 1.6 An indicative development layout plan is provided in Figure 2.
- 1.7 The various noise indices referred to in this report are described in Appendix I. All noise levels mentioned in the text have been rounded to the nearest decibel, as fractions of decibels are imperceptible.

2.0 NOISE CRITERIA

- 2.1 The *National Planning Policy Framework (NPPF)* December 2023 states at paragraph 180 that *“Planning policies and decisions should contribute to and enhance the natural and local environment by: ... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of ... noise pollution ...”*.
- 2.2 Further, paragraph 191 states that *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life ...”*.
- 2.3 However, there is as yet no specific guidance on numerical acoustic assessment/design criteria for proposed new housing developments provided in the NPPF, nor in the accompanying Technical Guidance document, National Planning Practice Guidance ‘Noise’.

ProPG: Planning & Noise

- 2.4 ProPG: Planning & Noise *‘Professional Practice Guidance on Planning & Noise’* 2017 provides “guidance on a recommended approach to the management of noise within the planning system in England”, predominantly for proposed new residential developments on land that is exposed to transportation noise.
- 2.5 It is noted that the guidance has no legal status. It does not constitute an official government code of practice and does not provide an authoritative interpretation of the law or government policy.
- 2.6 The ProPG recommends a staged approach to assessment. Stage 1 is an initial site noise risk assessment, indicating whether the proposed site is considered to pose a negligible, low, medium or high risk from a noise perspective.
- 2.7 At low noise levels, the more likely the site is to be acceptable from a noise perspective provided that a good acoustic design process is followed and an ADS (Acoustic Design Statement) confirms how the adverse impacts of noise will be mitigated and minimised in the finished development.

- 2.8 As noise levels increase, the site is likely to be less suitable from a noise perspective and any subsequent application may be refused unless a good acoustic design process is followed and an ADS confirms how the adverse impacts of noise will be mitigated and minimised, and which clearly demonstrate that a significant adverse noise impact will be avoided in the finished development.
- 2.9 High noise levels indicate that there is an increased risk that development may be refused on noise grounds. This risk may be reduced by following a good acoustic design process that is demonstrated in a detailed ADS.
- 2.10 Stage 2 of the recommended approach in ProPG is a full assessment to consider good acoustic design. The guidelines of ProPG in terms of suitable acoustic design criteria are broadly consistent with the guidance of BS 8233, and the sound insulation recommendations made later in this report have been designed to achieve the BS 8233 guidelines, as described below.
- 2.11 The scope of the ProPG is restricted to sites that are exposed predominantly to noise from transportation sources. However, the recommended approach is stated as being suitable where some industrial or commercial noise contributes to the acoustic environment provided that it is “*not dominant*”.

BS 8233

- 2.12 British Standard 8233: 2014 *Guidance on sound insulation and noise reduction for buildings*, which carries the full weight of an adopted British Standard, recommends guidance on design criteria for acceptable noise levels within residential accommodation, as summarised in Table 1.

Table 1 : BS 8233 Recommended Acoustic Design Criteria

Activity	Location	Internal Noise Levels	
		Daytime 0700-2300hrs	Night-time 2300-0700hrs
Resting	Living room	35 dB $L_{Aeq,16hr}$	-
Dining	Dining room / area	40 dB $L_{Aeq,16hr}$	-
Sleeping (daytime resting)	Bedroom	35 dB $L_{Aeq,16hr}$	30 dB $L_{Aeq,8hr}$

- 2.13 BS 8233 also states that, “*where development is considered necessary or desirable ... the internal target levels [i.e. those in Table 1] may be relaxed by up to 5dB and reasonable internal conditions still achieved*”.

- 2.14 BS 8233 clarifies that the above guidance relates only to noise without specific character (e.g. such as that which has a distinguishable, discrete and continuous tone, is irregular enough to attract attention, or has strong low-frequency content) and that where such characteristics are present, lower noise limits might be appropriate.
- 2.15 Further, BS 8233 states that if there is a reliance on closed windows to meet the guide values, *“there needs to be an appropriate alternative ventilation that does not compromise the façade insulation or the resulting noise level”*. Further, it is stated that assessments should be based on a room with *“adequate ventilation provided (e.g. trickle ventilators should be open)”*.
- 2.16 BS 8233 also recognises that regular individual noise events at night can cause sleep disturbance. Peaks of noise from individual events are usually described in terms of L_{Amax} values and these can be highly variable and unpredictable. ProPG states that *“in most circumstances in noise-sensitive rooms at night (e.g. bedrooms) good acoustic design can be used so that individual noise events do not normally exceed 45dB $L_{Amax,F}$ more than 10 times a night”*.
- 2.17 Regarding outdoor living areas, BS 8233 states that *“it is desirable that the external noise level does not exceed 50dB $L_{Aeq,T}$ with an upper guideline value of 55dB L_{Aeq} , which would be acceptable in noisier environments. However, it is recognised that these guideline values are not achievable in all circumstances where development might be desirable. In higher noise areas such as city centres or urban areas adjoining the strategic transport network, compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted. In such a situation, developments should be designed to achieve the lowest practicable levels in these external amenity spaces, but should not be prohibited.”*

3.0 NOISE SURVEY

3.1 Noise monitoring has been undertaken at the site over the course of Thursday 11 and Friday 12 January 2024. The purpose of the noise survey was to quantify the level of road traffic noise from the adjacent roads to the development site.

3.2 The noise measurement locations are identified in Figure 1.

A3 Road Traffic Noise

3.3 Continuous noise monitoring was carried out at Location 1 in sequential 5-minute samples over a complete 24-hour period.

3.4 Location 1 is fairly central to the north boundary of the site. The microphone at this location was elevated to about 3.0m above site level to ensure a clear view over the entire A3 carriageway, and hence provide optimal reference road traffic noise levels at this location.

3.5 The daytime $L_{Aeq,16hr}$ and night-time $L_{Aeq,8hr}$ noise exposure levels at Location 1 have been obtained from the logarithmic average of all the $L_{Aeq,5min}$ noise measurement samples over each of those periods. To provide a robust interpretation of ProPG guidelines relating to L_{Amax} , the overall night-time L_{Amax} noise level has been determined for assessment purposes as the measured $L_{Amax,5min}$ exceeded no more than 5 times over the full night-time period.

3.6 Further to the continuous noise monitoring, over the course of the survey period a number of supplementary noise measurements were undertaken at Locations 2 - 7.

3.7 The supplementary noise measurements were all undertaken in sets of 5-minute samples and each of those was concurrent with individual 5-minute measurement samples at Location 1.

3.8 Locations 2 – 4 are 10m laterally back from the north site boundary, directly away from the A3. Locations 5 – 7 are 20m back from the north site boundary.

3.9 At each of Locations 2 – 7, supplementary noise measurements were undertaken both at 1.4m above local ground and also at >4.0m above local ground, to help determine representative noise levels at potential future ground and first floor levels of residences. This accounts for variation in noise with height due to the position of the A3 being in a substantial cutting.

- 3.10 In broad accordance with the ‘Comparative Measurements’ technique set out in the Department of Transport document ‘Calculation of Road Traffic Noise’ (CRTN), 1988, the overall daytime and night-time noise levels at Locations 2 – 7 have been determined for both measurement heights by applying the average difference in measured $L_{A10,5min}$ noise levels at these locations with the concurrent $L_{A10,5min}$ measurements at Location 1, to the overall daytime and night-time noise levels determined for Location 1.
- 3.11 The overall daytime and night-time A3 road traffic noise levels at Locations 1 – 7 are summarised in Table 2.

Table 2 : Overall Daytime and Night-time Noise Levels at Locations 1-7

Distance from North Boundary	Location	Measurement Height	Daytime (0700-2300hrs)	Night-time (2300-0700hrs)	
			dB $L_{Aeq,16hr}$	dB $L_{Aeq,8hr}$	dB L_{Amax}
-	1	3.0m	72	66	78
10m	2	1.4m	64	58	70
		>4.0m	67	61	73
	3	1.4m	63	57	69
		>4.0m	67	61	73
	4	1.4m	63	57	69
		>4.0m	67	61	73
20m	5	1.4m	63	57	69
		>4.0m	64	59	70
	6	1.4m	63	57	69
		>4.0m	64	58	70
	7	1.4m	62	57	68
		>4.0m	64	59	71

B3004 Headley Road Traffic Noise

- 3.12 Continuous noise monitoring was carried out at Location 8 in sequential 15-minute samples over a 3-hour daytime period of 1400-1700hrs and then in sequential 2-minute samples over a complete 8-hour night-time period, i.e. 2300-0700hrs.
- 3.13 Location 8 was towards the southern part of the east boundary of the site.

- 3.14 The daytime $L_{Aeq,16hr}$ noise exposure level at Location 8 has been determined in accordance with the ‘Shortened Measurement Procedure’ described in CRTN. This procedure involves taking noise measurements in terms of $L_{A10,T}$ over representative time periods within any three consecutive hours between 1000hrs and 1700hrs. By taking the $L_{A10,3hr}$ as the arithmetic mean of the measured L_{A10} values, the $L_{A10,18hr}$ value can then be calculated. The correction to obtain the $L_{A10,18hr}$ value from the $L_{A10,3hr}$ level is -1dB. The $L_{A10,18hr}$ values have then been converted into the equivalent $L_{Aeq,16hr}$ values by applying a correction of -2dB, as set out in paragraph 6.2.2 of BS 8233.
- 3.15 The night-time $L_{Aeq,8hr}$ noise exposure levels at Location 8 have been obtained from the logarithmic average of all measured $L_{Aeq,2min}$ noise measurement samples over the period of 2300-0700hrs at each location. To provide a robust interpretation of ProPG guidelines relating to L_{Amax} , the overall night-time L_{Amax} noise level at Location 8 has been determined for assessment purposes as the measured $L_{Amax,2min}$ exceeded no more than 10 times over the full night-time period.
- 3.16 Further to above the continuous noise monitoring, a number of supplementary noise measurements were undertaken at Locations 9 and 10. These supplementary noise measurements were undertaken in sets of 5-minute samples and each of those was concurrent with additional 5-minute measurement samples at Location 8.
- 3.17 Locations 8, 9 and 10 are set back 7.5m, 15m and 25m respectively from the nearside edge of the Headley Road carriageway.
- 3.18 All noise measurements at Locations 8 – 10 were undertaken at 1.4m above local ground.
- 3.19 Again, in broad accordance with the ‘Comparative Measurements’ technique set out in CRTN, the overall daytime and night-time noise levels at Locations 9 and 10 have been determined by applying the average difference in measured $L_{A10,5min}$ noise levels at these locations with the concurrent $L_{A10,5min}$ measurements at Location 8, to the overall daytime and night-time noise levels determined for Location 8.
- 3.20 The overall daytime and night-time Headley Road traffic noise levels are summarised in Table 3.

Table 3: Overall Daytime and Night-time Noise Levels at Locations 8-10

Location	Daytime (0700-2300hrs)	Night-time (2300-0700hrs)	
	dB $L_{Aeq,16hr}$	dB $L_{Aeq,8hr}$	dB L_{Amax}
8	65	56	73
9	62	52	70
10	61	51	69

- 3.21 The noise measurements were undertaken using a Norsonic 140 Class 1 Integrating Sound Level Meter (serial no. 1406529), an NTi Audio XL2-TA 'Class 1' sound analyser and a Bruel & Kjaer 2260 Type 1 Integrating Noise Level Meter (serial no. 2467014). Calibration checks were carried out to all equipment using a Norsonic Acoustic Calibrator, Type 1251 (serial no. 20804) and a Bruel & Kjaer Acoustic Calibrator, Type 4231 (serial no. 2389221) before and after the survey, and no variation in calibration level was observed.
- 3.22 Weather conditions during the survey were dry and cold, with a light north-easterly breeze of speeds typically up to ~3m/s.
- 3.23 At all locations, the measurement microphones were fitted with windshields and mounted in 'free-field' conditions.
- 3.24 All measured noise levels are detailed in Appendix II.

4.0 ASSESSMENT AND MITIGATION OF IMPACTS

- 4.1 Based on the noise exposure levels summarised in Table 2, noise levels from the A3 naturally reduce on moving away from the site boundary. This is due to the acoustic screening effects of the road lying in a cutting, as well as the effects of distance attenuation.
- 4.2 Noise levels at 1.4m above local ground are generally very similar compared those at 10m and those at 20m from the boundary, with noise only reducing by about a further 1dB at the greater distance.
- 4.3 At 4.0m above local ground, noise levels are typically 3-4dB higher than the corresponding values at 1.4m when at 10m from the boundary but only about 1-2dB higher than the corresponding values at 1.4m when at 20m from the boundary. This again is due to the diminished effects of the acoustic screening effects of the cutting at greater height when closer to the road.
- 4.4 All noise levels at locations 2 – 7 fall within the **medium risk category** of the ProPG guidance. The daytime noise levels at 1.4m above local ground fall more towards the lower end of that category, whereas the night-time noise levels at >4.0m above local ground at 10m back from the boundary fall towards the upper end of that category.
- 4.5 Based on the noise exposure levels summarised in Table 3, Headley Road traffic noise levels fall within the **medium risk category** of the ProPG guidance in areas closest to the road, reducing with distance such that they fall within the low risk category from about 25m back from the nearside edge of the carriageway.
- 4.6 It is therefore recommended that some noise mitigation measures are required to secure good acoustic conditions for future occupants of the proposed residential development in areas closest to the A3 and Headley Road.
- 4.7 At present there is no fixed masterplan, however outline advice is provided drawing on the indicative layout plan provided in Figure 1.
- 4.8 Firstly, in terms of external noise levels in private garden areas, generally for proposed residences nearest to the A3 and Headley Road, these are set out in the indicative layout plan as being oriented to the opposite side of the associated building, and hence will be provided optimum protection.
- 4.9 The indicative masterplan also indicates a plot to the northwest corner of the site (to the end of a run of similar plots along the west boundary) that will be side on to the A3, hence with the garden area only partially protected by the associated building. In this case, it is anticipated that garden noise levels will exceed the upper guideline value set out in BS 8233 of 55dB $L_{Aeq,T}$.

- 4.10 The extent of this could be minimised by introducing acoustic barriers to the garden boundaries that are open towards the A3 (taking the visual form a relatively standard garden fence or wall), however it is anticipated that the efficacy of this will be fairly limited, given that a fairly significant level of acoustic screening is already present due to the cutting.
- 4.11 Ideally, therefore, this plot (or any similar case) would be reorientated such that the garden is more fully protected by the associated building.
- 4.12 Ultimately, it is recognised that there is a need to accommodate other technical and planning implications in overall layout design, and this can sometimes constrain providing a layout that is specifically optimised to any one technical element, e.g noise. This is reflected in Clause 7.7.3.2 of BS 8233, which notes that control of external noise in gardens to the upper guideline value is not achievable in all circumstances and, in such cases, developments should be designed to achieve the lowest practicable levels in external amenity spaces, but should not be prohibited.
- 4.13 As such, notwithstanding the foregoing advice, it may be beneficial/necessary to incorporate some additional acoustic fences / walls at garden boundaries, where design constraints result in some areas of gardens not being fully protected by the houses.
- 4.14 In terms of internal noise, again site layout may form part of any noise mitigation strategy. Where plots are set out in the indicative layout plan fronting towards the A3, this firstly introduces an access drive in front of the houses, to maximise distance buffer, however this also is likely to result in fewer noise sensitive internal areas being biased towards the north (A3-facing) side, specially at ground floor level.
- 4.15 In the case of the plot to the northwest of the site, this encroaches slightly closer to the A3 boundary than other plots along the north, as currently shown, however this plot is arranged with gable-end facing towards the road. Assuming this gable-end wall does not contain habitable room, the reduced angle-of-view to the road will typically offset the slightly smaller distance buffer, in terms of noise.
- 4.16 Nonetheless, in areas closest to and facing the A3, some additional noise mitigation will be required in the form of acoustically-rated glazing and ventilation systems of suitable specification.
- 4.17 Based on current layout proposals, it is anticipated that a suitable system will comprise a moderate specification acoustic glazing system, with an indicative sound insulation performance of about 33dB R_w+C_{tr} , typically achievable with system comprising 10mm and 6mm standard panes on a 12mm air gap (i.e. 10-12-6), plus acoustically trickle ventilators, typically rated at least 40dB $D_{n,e,w}$.

- 4.18 The above specification applies for habitable rooms oriented with a view towards the north boundary of the site.
- 4.19 In all other areas, lower acoustic specifications of glazing and ventilation systems will typically be adequate in all other areas of the site. Subject to review of finalised layout plans, it is anticipated that in most areas, standard thermal double glazing (typically a system comprising two 4mm thick standard panes on a minimum 12mm air cavity; i.e. 4-12-4) with standard non-acoustic trickle vents will suffice.
- 4.20 This includes for habitable rooms of plots fronting towards Headley Road (except where also more proximate to the A3) based on the proposed set back from Headley Road show in the indicative layout in Figure 2. Commensurately higher specifications may be required for habitable rooms if to be closer to that road.
- 4.21 It should be noted that, notwithstanding the foregoing advice, which pertains to relevant guidance on noise for planning purposes, further consideration will be required at the appropriate stage with respect to the acoustic implications of Approved Document O of the Building Regulations. In areas of the site affected by higher noise levels, this would be expected to require an alternative means of cooling (potentially mechanical systems), in lieu of an excessive uplift in internal noise with windows open.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 Hepworth Acoustics has undertaken a noise assessment relating to a proposed residential development at a site known as Land to the West of Headley Road, Liphook.
- 5.2 A noise survey has been undertaken at the site and the prevailing daytime and night-time road traffic noise levels have been determined.
- 5.3 Recommendations of appropriate noise mitigation measures have been made where necessary in order to achieve appropriate acoustic criteria in line with relevant British Standard guidelines.

Figure 1: Site Plan



Figure 2: Indicative Development Layout



Appendix I: Noise Units & Indices

Sound and the decibel

A sound wave is a small fluctuation of atmospheric pressure. The human ear responds to these variations in pressure, producing the sensation of hearing. The ear can detect a very wide range of pressure variations. In order to cope with this wide range of pressure variations, a logarithmic scale is used to convert the values into manageable numbers. Although it might seem unusual to use a logarithmic scale to measure a physical phenomenon, it has been found that human hearing also responds to sound in an approximately logarithmic fashion. The dB (decibel) is the logarithmic unit used to describe sound (or noise) levels. The usual range of sound pressure levels is from 0 dB (threshold of hearing) to 120dB (threshold of pain).

Due to the logarithmic nature of decibels, when two noises of the same level are combined together, the total noise level is (under normal circumstances) 3 dB(A) higher than each of the individual noise levels e.g. 60 dB(A) plus 60 dB(A) = 63 dB(A). In terms of perceived 'loudness', a 3 dB(A) variation in noise level is a relatively small (but nevertheless just noticeable) change. An increase in noise level of 10 dB(A) generally corresponds to a doubling of perceived loudness. Likewise, a reduction in noise level of 10 dB(A) generally corresponds to a halving of perceived loudness.

Frequency and Hertz (Hz)

As well as the loudness of a sound, the frequency content of a sound is also very important. Frequency is a measure of the rate of fluctuation of a sound wave. The unit used is cycles per second, or hertz (Hz). Sometimes large frequency values are written as kilohertz (kHz), where 1 kHz = 1000 Hz.

Young people with normal hearing can hear frequencies in the range 20 Hz to 20 kHz. However, the upper frequency limit gradually reduces as a person gets older.

The ear is not equally sensitive to sound at all frequencies. It is less sensitive to sound at low and very high frequencies, compared with the frequencies in between. Therefore, when measuring a sound made up of different frequencies, it is often useful to 'weight' each frequency appropriately, so that the measurement correlates better with what a person would actually hear. This is usually achieved by using an electronic filter called the 'A' weighting, which is built into sound level meters. Noise levels measured using the 'A' weighting are denoted dB(A) or dBA.

Glossary of Terms

When a noise level is constant and does not fluctuate, it can be described adequately by measuring the dB(A) level. However, when the noise level varies with time, the measured dB(A) level will vary as well. In this case it is therefore not possible to represent the noise climate with a simple dB(A) value. In order to describe noise where the level is continuously varying, a number of other indices can be used. The indices used in this report are described below.

L_{Aeq} This is the A-weighted 'equivalent continuous noise level' which is an average of the total sound energy measured over a specified time period. In other words, L_{Aeq} is the level of a continuous noise which has the same total (A-weighted) energy as the real fluctuating noise, measured over the same time period. It is increasingly being used as the preferred parameter for all forms of environmental noise.

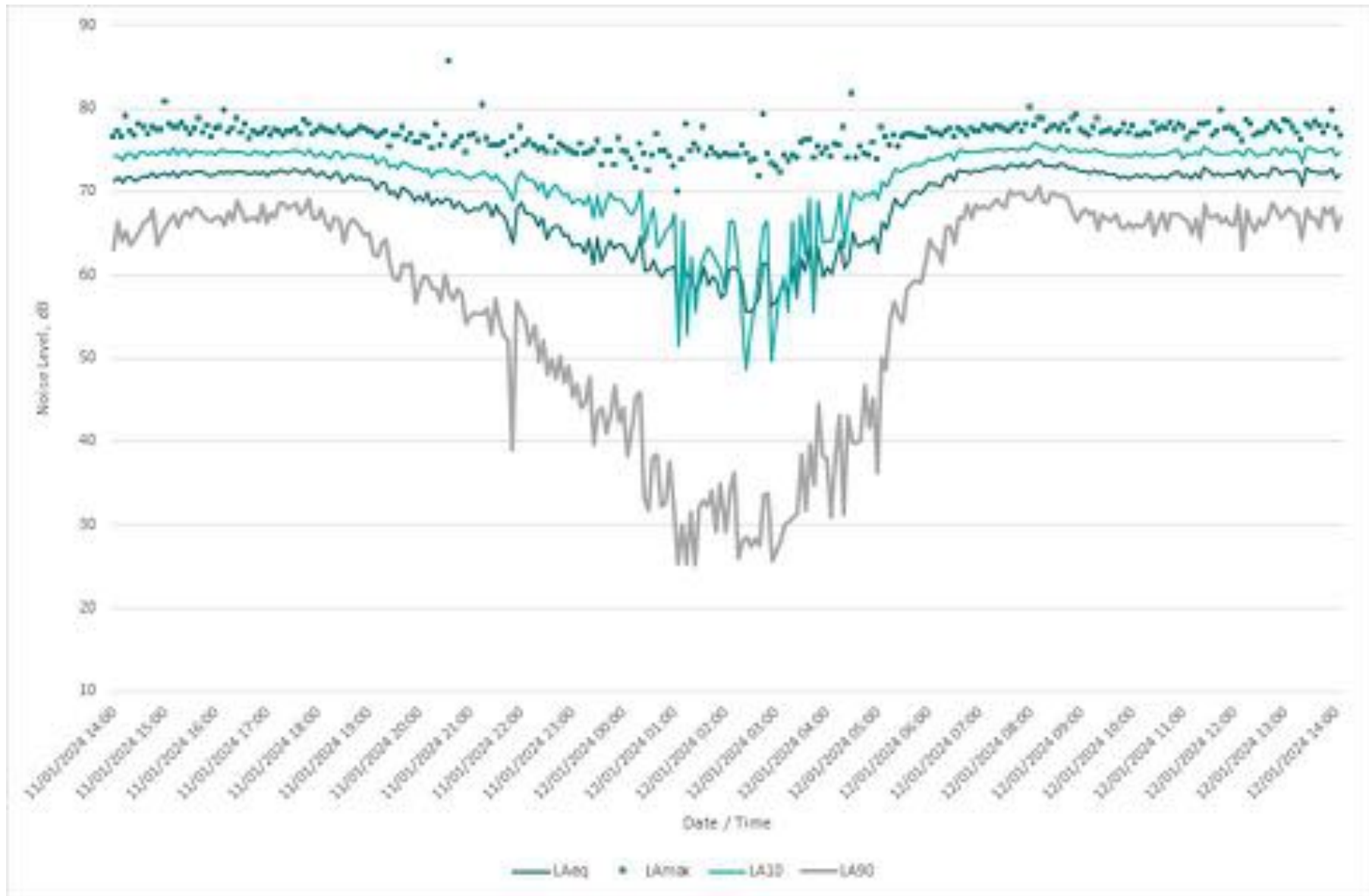
L_{Amax} This is the maximum A-weighted noise level that was recorded during the monitoring period.

L_{A10} This is the A-weighted noise level exceeded for 10% of the time period. L_{A10} is used as a measure of road traffic noise.

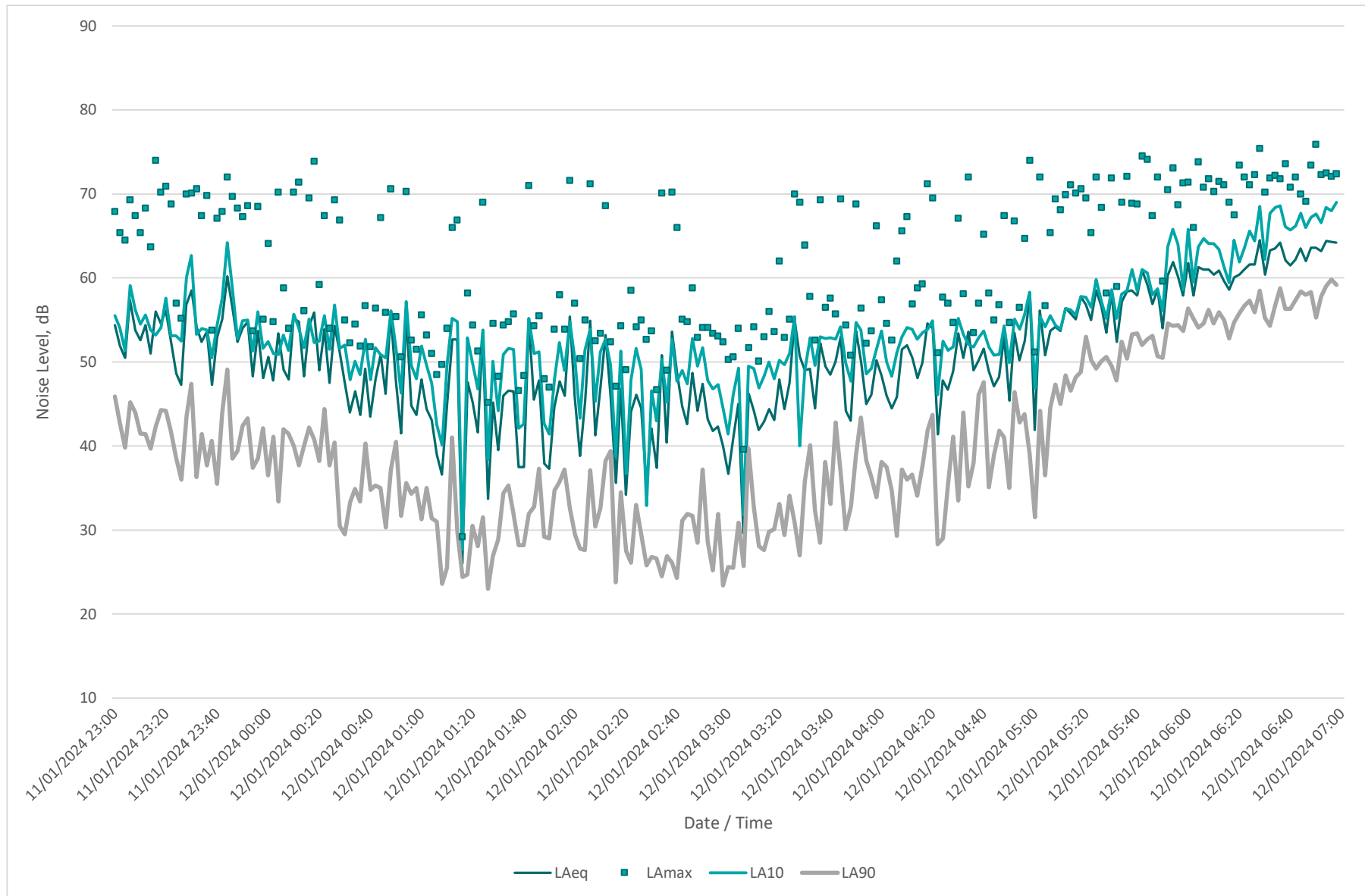
L_{A90} This is the A-weighted noise level exceeded for 90% of the time period. L_{A90} is used as a measure of background noise.

Appendix II: Noise Survey Results

Location 1



Location 8 (Night-Time)



Location 2 – 1.4m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
11/01/2024	15:55	66	72	68	63
11/01/2024	16:00	65	69	67	63
11/01/2024	16:05	65	69	67	63
11/01/2024	16:10	66	69	67	63

Location 2 – >4.0m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
12/01/2024	12:35	68	72	70	64
12/01/2024	12:40	68	72	70	65
12/01/2024	12:45	69	74	71	67
12/01/2024	12:50	69	72	71	66

Location 3 – 1.4m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
11/01/2024	15:05	65	68	66	62
11/01/2024	15:10	64	70	66	62
11/01/2024	15:15	65	69	66	62
11/01/2024	15:20	65	68	67	62

Location 3 – >4.0m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
12/01/2024	11:45	67	73	69	64
12/01/2024	11:50	68	72	70	64
12/01/2024	11:55	68	72	69	64
12/01/2024	12:00	68	72	70	64

Location 4 – 1.4m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
11/01/2024	16:45	65	69	66	62
11/01/2024	16:50	65	72	66	62
11/01/2024	16:55	64	68	66	62
11/01/2024	17:00	64	68	66	62

Location 4 – >4.0m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
12/01/2024	13:25	69	74	71	66
12/01/2024	13:30	69	74	71	65
12/01/2024	13:35	69	74	71	65
12/01/2024	13:40	69	75	71	65

Location 5 – 1.4m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
11/01/2024	16:20	65	69	66	62
11/01/2024	16:25	65	75	66	63
11/01/2024	16:30	64	68	66	62
11/01/2024	16:35	65	70	66	61

Location 5 – >4.0m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
12/01/2024	13:00	66	70	68	64
12/01/2024	13:05	66	70	67	63
12/01/2024	13:10	66	69	68	64
12/01/2024	13:15	66	70	68	63

Location 6 – 1.4m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
11/01/2024	15:30	62	69	66	62
11/01/2024	15:35	65	68	66	63
11/01/2024	15:40	64	69	66	62
11/01/2024	15:45	64	68	65	61

Location 6 – >4.0m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
12/01/2024	12:10	65	69	67	61
12/01/2024	12:15	66	69	67	63
12/01/2024	12:20	65	69	67	62
12/01/2024	12:25	64	68	66	62

Location 7 – 1.4m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
11/01/2024	17:10	64	67	65	62
11/01/2024	17:15	64	67	66	62
11/01/2024	17:20	64	69	66	62
11/01/2024	17:25	64	68	66	61

Location 7 – >4.0m above Local Ground

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
12/01/2024	13:50	66	71	68	64
12/01/2024	13:55	66	70	68	63
12/01/2024	14:00	65	72	68	61
12/01/2024	14:05	66	71	68	64

Location 8 (Daytime)

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
11/01/2024	14:00	65	75	69	58
11/01/2024	14:15	66	92	69	57
11/01/2024	14:30	65	76	69	58
11/01/2024	14:45	66	91	69	59
11/01/2024	15:00	65	74	69	59
11/01/2024	15:15	65	86	69	59
11/01/2024	15:30	65	73	68	59
11/01/2024	15:45	65	72	68	59
11/01/2024	16:00	64	74	68	58
11/01/2024	16:15	65	74	68	58
11/01/2024	16:30	64	75	67	57
11/01/2024	16:45	64	74	68	57
12/01/2024	14:15	65	72	68	57
12/01/2024	14:20	65	75	69	57
12/01/2024	14:25	65	76	69	57
12/01/2024	14:30	65	77	69	57
12/01/2024	14:40	65	73	68	57
12/01/2024	14:45	66	71	68	60
12/01/2024	14:50	65	73	69	60
12/01/2024	14:55	65	73	69	59

Location 9

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
12/01/2024	14:15	62	67	65	57
12/01/2024	14:20	62	68	65	57
12/01/2024	14:25	62	71	65	57
12/01/2024	14:30	62	72	65	58

Location 10

Date	Time	Noise Level			
		dB L_{Aeq}	dB L_{Amax}	dB L_{A10}	dB L_{A90}
12/01/2024	14:40	62	66	64	57
12/01/2024	14:45	62	66	64	60
12/01/2024	14:50	62	68	64	60
12/01/2024	14:55	62	67	64	59

Appendix 5 Vision Document Prepared by ECE Architecture March 2024



LAND WEST OF HEADLEY ROAD, LIPHOOK VISION DOCUMENT

reside

ECE Architecture

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Revisions

Revision	Notes	Issue Date	By	Checked By
A	Updates to Clients Comments	04.03.2024	KB	AK
B	Updates to Clients Comments	04.03.2024	KB	AK

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1.01 INTRODUCTION

This Vision Document, prepared on behalf of Reside Developments, sets out the vision for a new neighbourhood on land west of Headley Road, Liphook ('the Site'), following the Site's proposed allocation for residential-led development in the Draft East Hampshire Local Plan. It is submitted in support of detailed representations to the East Hampshire Draft Local Plan Regulation 18 consultation.

Reside Developments is the owner of the Site and welcomes the opportunity to engage with East Hampshire District Council (EHDC) in respect of the new Local Plan to secure and deliver much-needed housing at this strategically well-located site.

Following EHDC's identification of the Site as a location for development, this Vision Document provides further information to justify and support the proposed allocation of the Site, with comprehensive technical assessments to demonstrate the suitability and deliverability of the Site to meet the housing needs and deliver wider benefits for the community.

The assessment work undertaken to date has culminated in the preparation of an Illustrative Site Plan that shows how the Site could be developed. The Illustrative Site Plan confirms that the Site can deliver up to 35 new homes and associated new public open spaces.

This Vision Document and the suite of technical information that supports Reside Developments representations enables East Hampshire District Council, the community and any other interested parties to better understand the analysis that has informed the illustrative site plan and demonstrate the Site's suitability and deliverability.

This Vision Document is intended to enable EHDC and other interested parties to better understand the detailed assessment work undertaken by the appointed project team that has underpinned the design of the development proposal.



Site Location

1.02 ABOUT RESIDE DEVELOPMENTS

Reside Developments Ltd (Reside), is a multidisciplinary company who have the clear objective of being recognised for both the precision, quality, and innovation behind its property designs and its ability to provide a 'one brand' solution for all aspects of land acquisition and build.

The Company, which was established in 2004 and has to date developed a collection of well-considered properties across the South East, is renowned for its skill in adding value to sites through its extensive knowledge of the planning system.

Widely recognised for its high standards and the quality of its developments, Reside is proud to have won the following awards:

- Best New Homes Interior Design Project (Under £50k) – Winner - Stable Mews at Frith Park (November 2019);
- Best New Apartment Scheme – Including Retirement Developments – Winner - The Mansion House at Frith Park (November 2019);
- The Evening Standard New Homes Award;
- The Godalming Trust Civic Design Award;
- The Mayor's Award at The Surrey Property Awards;
- The Guildford Design Award.

Land owners and agents who have experienced Reside's suite of services comment:

"Reside is by far one of the most knowledgeable and approachable companies; they're a pleasure to do business with."

"Reside has a wealth of experience in land acquisition, development, and maximising planning consents. As a private land owner, I have enjoyed not only the friendly rapport but have also been impressed by their ability to think outside the box and find new angles to resolve specific planning issues."

Reside take a landscape-led approach to create built environments which sit comfortably with their neighbours, where people are proud to live.

Typically Reside consider:

- Potential impacts on, and capacity of the landscape to absorb development;
- Views, boundaries, access, vegetation, enclosure, topography, water bodies and other factors that would influence the layout;
- Constraints and opportunities including landscape character and views;
- Ways to create a new 'place' which fits easily and naturally with its social context, quality of the landscape and habitat;
- How to respect, re-use and improve water management in and around the area;
- Respect for and incorporation of existing heritage assets.

reside



1.03 THE VISION

The proposed development of the land west of Headley Road offers an exciting and unique opportunity to create a sustainable and attractive development.

The proposals will be landscape-led, delivering attractive, energy efficient new homes to meet local housing needs, including an appropriate provision of affordable housing.

The key features of our proposals include:

- Creation of up to 35 residential dwellings;
- Provide high-quality homes with a sustainable mix of dwelling sizes to promote a diverse community;
- Provide appropriate and policy compliant affordable housing provision;
- Retention of the existing boundary trees and landscaping within the Site along with additional significant native planting introduced;
- Create new publicly accessible open spaces that will enhance local connectivity and provide spaces for existing and new residents of Liphook to enjoy;
- Through careful planning and implementation of green infrastructure and sustainable practices, the development will achieve a 10% biodiversity net gain, ensuring that the natural environment flourishes alongside urban expansion;
- Implementation of renewable energy sources for reduced carbon footprint;
- Creation of pedestrian-friendly pathways and cycling infrastructure to encourage active lifestyles.



2.01 THE SITE

The Site is located on the northern edge of Liphook within the district of East Hampshire.

The Site is located adjacent to the existing settlement of Liphook and comprises 1.56ha of agricultural land in a single ownership bordered by mature hedgerows and trees. The Site is bounded to the east by Headley Road, to the north by a substantial landscape buffer and the A3 carriageway, to the west by SANG land, adjoining a recently completed development of 175 new homes (ref: 34310/041), and to the south by a residential dwelling in a large plot.






An area further to the south of the Site is designated as a Conservation Area and includes a number of listed buildings.

The Site is located within Flood Zone 1 (at a low risk of flooding from rivers) and the topography is generally flat. The Site falls within 5km of the Wealden Heaths II Special Protection Area (SPA). There are Tree Preservation Orders on the Site's western and eastern boundary.

The entire Site is located outside of the settlement boundary as currently defined in the adopted development plan. With respect to the surrounding character, there are large residential properties in large plots on the eastern side of Headley Road, to the south of the site, and broadly opposite the proposed site access to the eastern side of Headley Road there is a modern residential development (Hunters Chase).

The South Downs National Park is located approximately 800m to the south of the Site, where the Site is separated by existing housing estates to the north-west of Liphook.

Key

-  Site Boundary
-  Conservation Area
-  Grade II Listed Building
-  Completed Development ref: 34310/041
-  SANG



2.01 THE SITE

On this page, you will find aerial view images showcasing the site from above. These visuals provide a unique perspective, offering insight into the scale and surrounding context of the Site.



1. Aerial view of the Site looking north west



Key Plan



2. Aerial view of the site towards eastern boundary planting and residential area



3. Aerial view of the site towards western boundary and SANG beyond residential area

2.01 THE SITE

The images on this page are capturing the boundary edge of the development, providing an up-close view of the interface between the project site and its surrounding environment. These visuals offer a detailed glimpse of the transition from the development area to adjacent landscapes or properties.



1. View from Headley Road looking west into the site



2. View from Headley Road looking west into the site



Key Plan



3. View from Headley Road looking north









2.02 FACILITIES

Liphook has strong residential context, consisting of residential properties and local amenities typical of a village. The village centre is located in The Square where much of the historic core is concentrated.

The village centre is a short walking distance from the site at approximately an 11 minute walk, providing a large range of amenities including a supermarket, post office, pharmacy, takeaways and a village hall. Liphook Infant School and Junior School is located within a 7 minute walk, with nearby Bohunt Secondary School at approximately 14 minute walk.



Key

- | | |
|---|---|
|  Medical |  Post Office |
|  Retail/Commercial |  School/Academy |
|  Village Hall |  Recreational Facility |
|  Eatery / Pub |  Church |

Amenity Plan

2.03 ACCESSIBILITY

Liphook village centre is approximately a 10 minute walk away from the site, and benefits from a range of facilities.

Access to public transport is available with the nearest bus stops located approximately 0.5 mile to the south of the Site on Headley Road. The bus services provide links to Bordon and Haslemere.

The closest train station is Liphook, a 4 minute drive from the site at approximately 1 mile. Southwestern serve this station providing direct links to Portsmouth and London.

A preliminary highways analysis has been undertaken to assess the best and safest location for the access off of the Headley Road. Located within a 30mph limit stretch of road, the new access point would have suitable visibility and limit the impact on existing trees and hedgerows.



Key

- Site Access Point
- Liphook Railway Station
- Railway Line
- ➔ A3 Carriageway
- 🚌 Bus Stop

Accessibility Plan

2.04 LOCAL CHARACTER

The area surrounding the site is predominantly characterised by residential developments, which feature a variety of architectural styles. These include traditional Vernacular buildings and Arts and Craft style. The character uses a blend of historic charm and modern influences, creating a diverse and visually engaging built environment.

As a result of the mixture of architectural styles, a variety of materials and features can be seen throughout Liphook.

Included are a series of photographs taken from nearby streets, which demonstrate the existing architectural and material context.

The dwellings to the east of the site adopts a uniform architectural style. Key characteristics include symmetrical elevations and gables that break the eaves line. Consistent materials are used including buff and red brick with stone quoining detail and window heads.



The dwellings to the south of the site along Headley Road comprise of large, detached dwellings in large plots within a landscaped setting and exhibit different architectural styles. The buildings adopt varying roof forms, elevational treatment and a mixture of materials including tile-hanging, brick, render and stone.



Several dwellings within the conservation area are in the arts and craft style characterised by the use of tile hanging to first floor or at gable face as well as the use of bricks and stone. Gable frontages are also common with decorative bargeboards. Additional detailing include quoining and stone drips.



To the southwest of the site, the dwellings are predominantly one and two storey detached houses that exhibit a variety of styles. Key characteristics of the bungalows include projecting gable frontages with tile hanging or timber cladding to the gable face, while the two storey houses feature barn hipped roofs.



Key Plan

2.05 HISTORY AND HERITAGE

The earliest detailed map to show Liphook is the 1846 tithe map, which is accompanied by a detailed list of landowners and uses assigned to each plot number. The distinctive road layout is clearly discernible with three routes leading northwards (Longmoor, Headley and London Roads), two southwards (Portsmouth and Midhurst Roads) and another eastward (Haslemere Road).

Following the establishment of the rail line to the south of Liphook village centre in the mid-19th century, a modest amount of new development was built in the northern portion of the Conservation

Area. This included residential buildings and also community amenities, including a new village hall on Headley Road and school on London Road.

As a result of the variety of architectural styles within the Conservation Area, there are many characteristic building materials and features. Using a combination of materials is common, especially masonry with red brick dressings and often with hung tiles on the upper portion. This combination is a particular characteristic of the Arts and Crafts style, but the use of hung tiles is not exclusive to

these buildings. The tiles are typically square cut with courses of scallop-cut tiles. Where tiles have been added to older (pre-19th century) or vernacular buildings, this was either to weatherproof exposed elevations before the Arts and Crafts style became popular, or an indication of trend-conscious owners in the later 19th century when a number of Arts and Crafts buildings were constructed in Liphook. Hung tiles are evident throughout the conservation area on buildings of all types.



An example of galetting and freestone



Red and grey Flemish bond brick



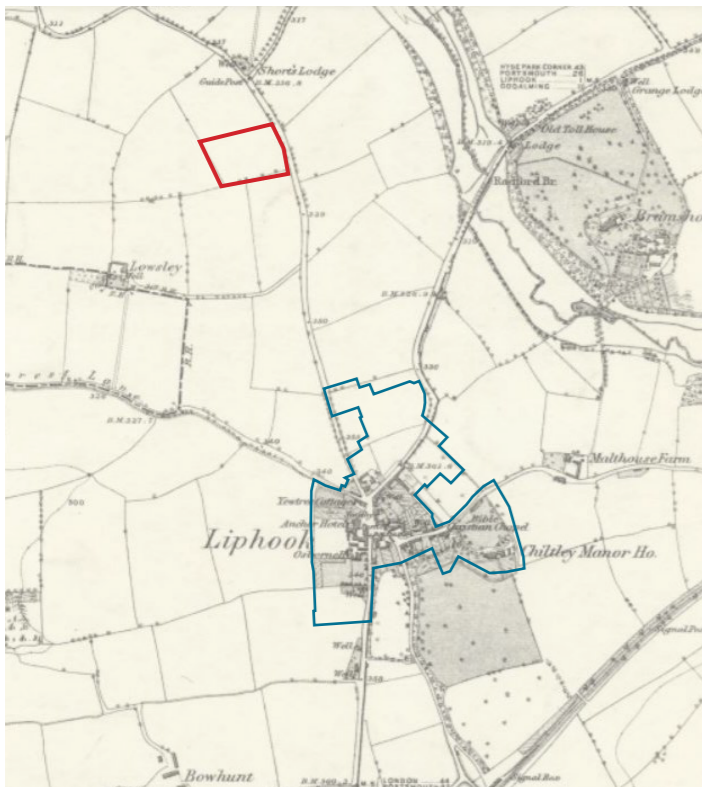
Hung tiles with scalloped detailing



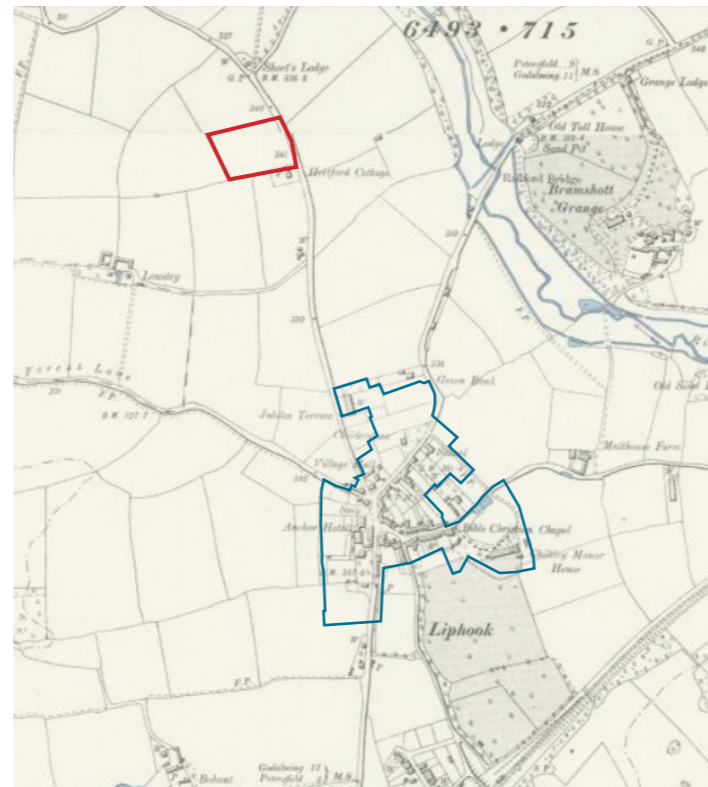
Compact development in different styles



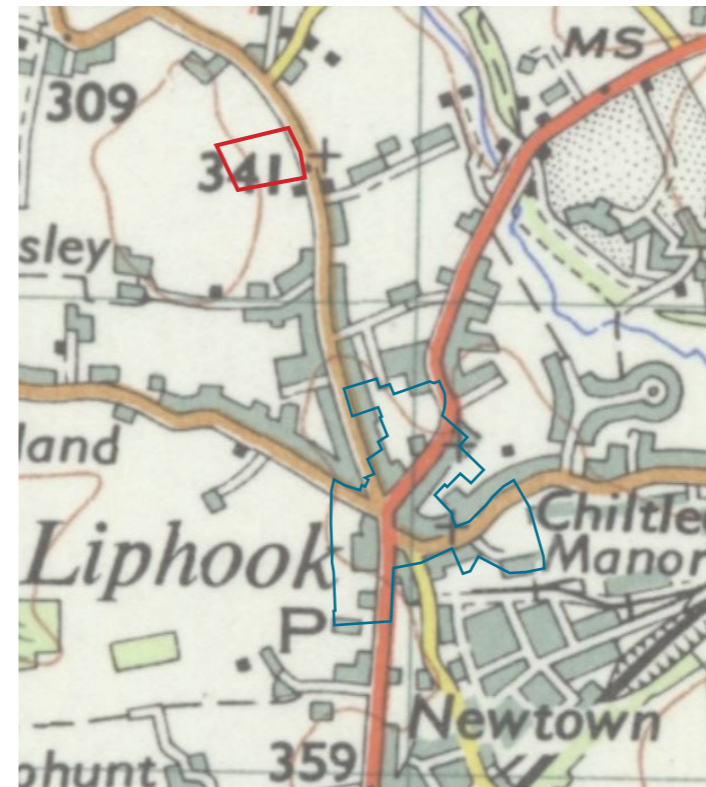
Early 20th-century shopfront



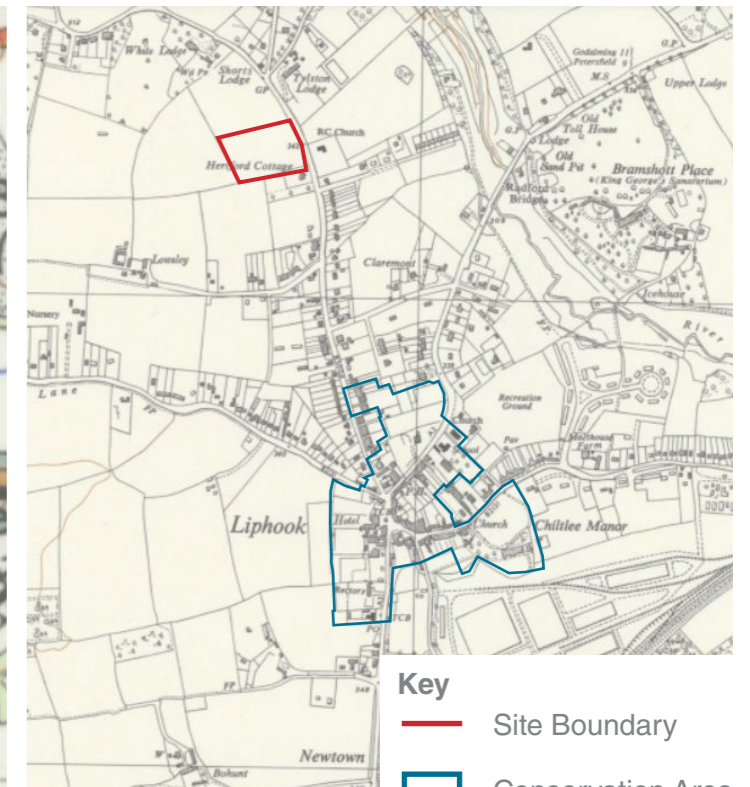
OS Map - 1830-1880



OS Map - 1888-1915



OS Map - 1952-1961



OS Map - 1940-1970

Key
— Site Boundary
 Conservation Area

3.01 PLANNING POLICY

National Planning Policy Framework ('NPPF')

The National Planning Policy Framework ('NPPF') was revised in December 2023, and sets out the Governments Planning Policy for England. The presumption in favour of sustainable development is placed at the heart of the NPPF. For plan-making this means positively seeking opportunities to meet the needs of the area whilst ensuring planning policies remain flexible for change. Furthermore, plans should make provision over and above identified housing need, as set out in strategic policies.

East Hampshire District Council ('EHDC')

The EHDC Local Plan consists of;

- Local Plan Part 1: Joint Core Strategy (June 2014)
- Local Plan Part 2L Housing and Employment Allocations (April 2016)
- Saved policies from the Local Plan Second Review (March 2006)
- Supplementary Planning Documents

EHDC are currently in the process of producing an updated Local Plan, for which the site is a proposed allocation under policy LIP2 – Land west of Headley Road, Liphook.

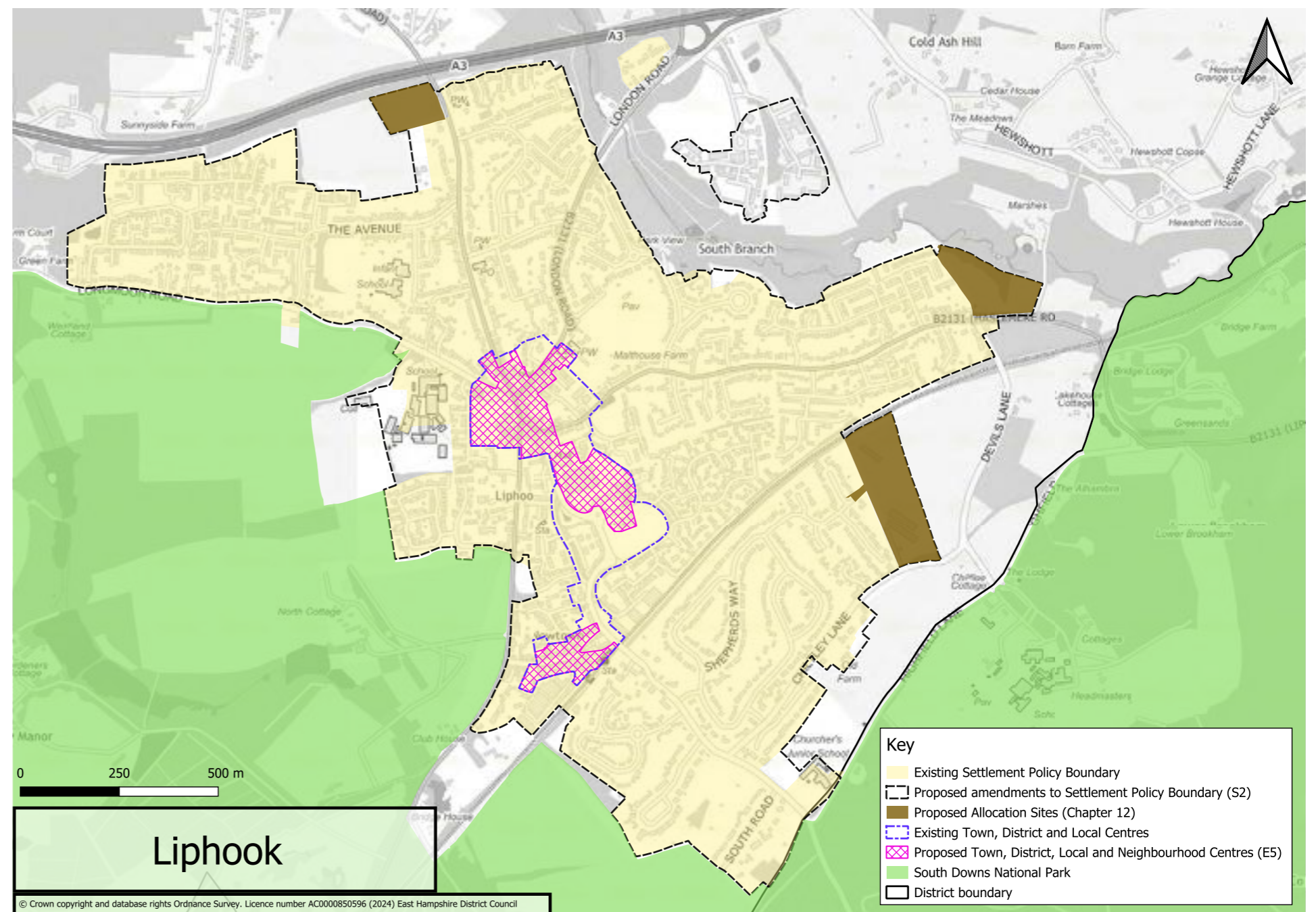
In accordance with the Local Development Scheme (July 2023) the Local Plan is anticipated to be adopted in 2025.

An extract of the Policies Map is provided to the right that proposes the site as a new allocated site for housing development.

Liphook Neighbourhood Plan

Bramshott and Liphook Parish Council are currently producing a Neighbourhood Plan. A Regulation 14 consultation was undertaken in 2023 and the Parish hope that the Regulation 16 consultation will be undertaken in March – April 2024.

The Neighbourhood Plan does not allocate any sites for residential development, instead the plan focusses on a number of policies for which development will have to adhere too.



3.02 SITE HISTORY AND DRAFT ALLOCATION

An application for 36 dwellings has previously been submitted on the site, this application was refused in 2015. Whilst the application was refused on the grounds the site is located in the countryside where justification is required to demonstrate a proven need for proposed housing, no potential ecology, flooding, noise, or highways issues were raised by statutory consultees.

The site is now a proposed allocation within the emerging East Hampshire District Council Local Plan 2021 – 2040 under policy LIP2 – Land west of Headley Road, Liphook.

The proposed allocation is for 20 homes, however this vision document, representations and supporting documentation, will demonstrate how the site can comfortably accommodate circa 35 homes.

LAA Reference- LIP-012

Site size - 1.56 ha

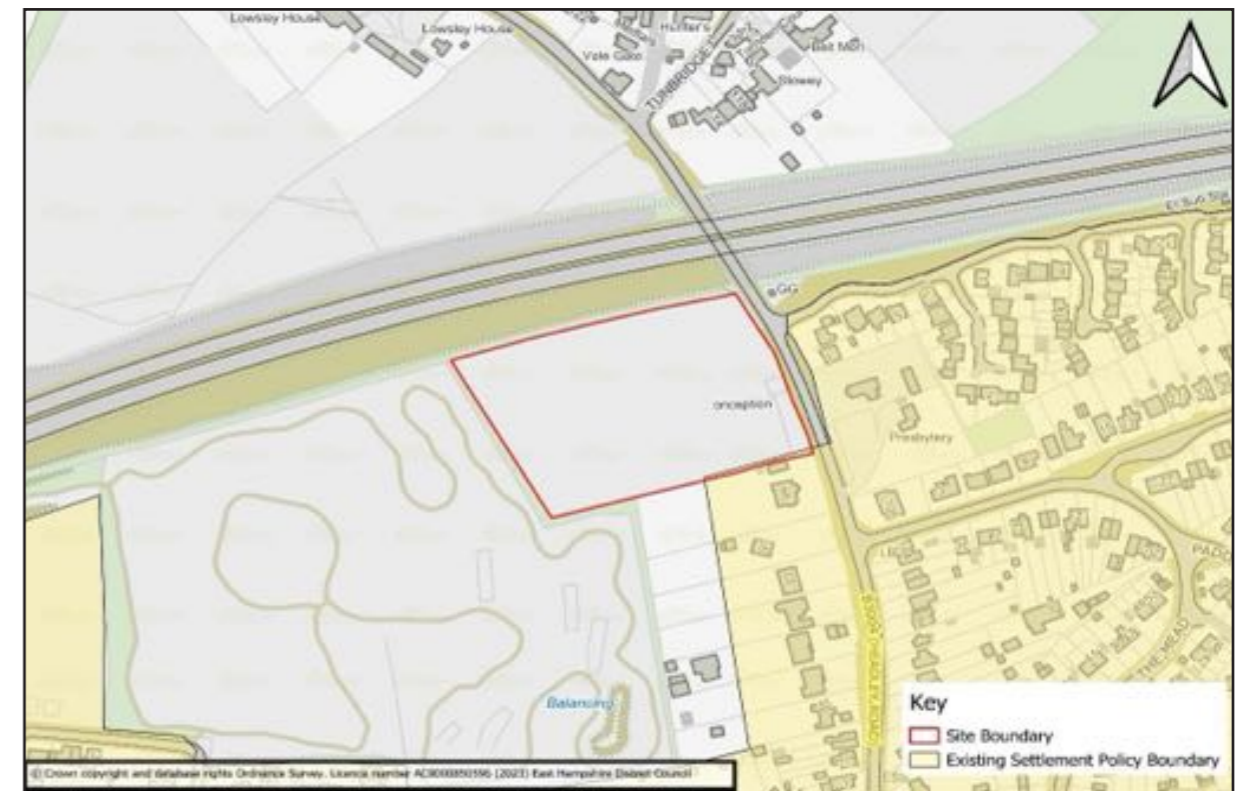
Existing use - Agriculture

Proposed future use - Housing

LIP2 – Land west of Headley Road, Liphook

List of constraints & opportunities

- **Flood risk:** there are no identified flood risks for this site.
- **Biodiversity:** there are single and area tree protection orders on the eastern and western boundaries of the site. Recreational impacts on the Wealden Heaths Phase II Special Protection Area would need to be appropriately mitigated.
- **Green infrastructure:** mature vegetation on the site boundaries contributes to the site's visual containment within the landscape.
- **Access:** potential to connect the site to the network of paths within the adjoining SANG, for purposes of encouraging healthy & active lifestyles.
- **Access:** connection to the local road network could be achieved via the existing field entrance on the eastern boundary of the site.
- **Landscape:** there is potential for adverse landscape and visual impacts, depending on site layout, building typologies, and the density of built form.
- **Built heritage:** no designated constraints to development.
- **Noise & air quality:** potential for adverse impacts on residential amenity in northern areas of the site from noise and air pollution associated with traffic on the A3.
- **Agricultural land quality:** the site could contain areas of Grade 3 agricultural land, which is a finite resource.



Excerpt from Part D - Chapter 12- Site Allocations - Draft Local Plan 2021 2040 - East Hampshire DC

4.01 ACCESS / HIGHWAYS

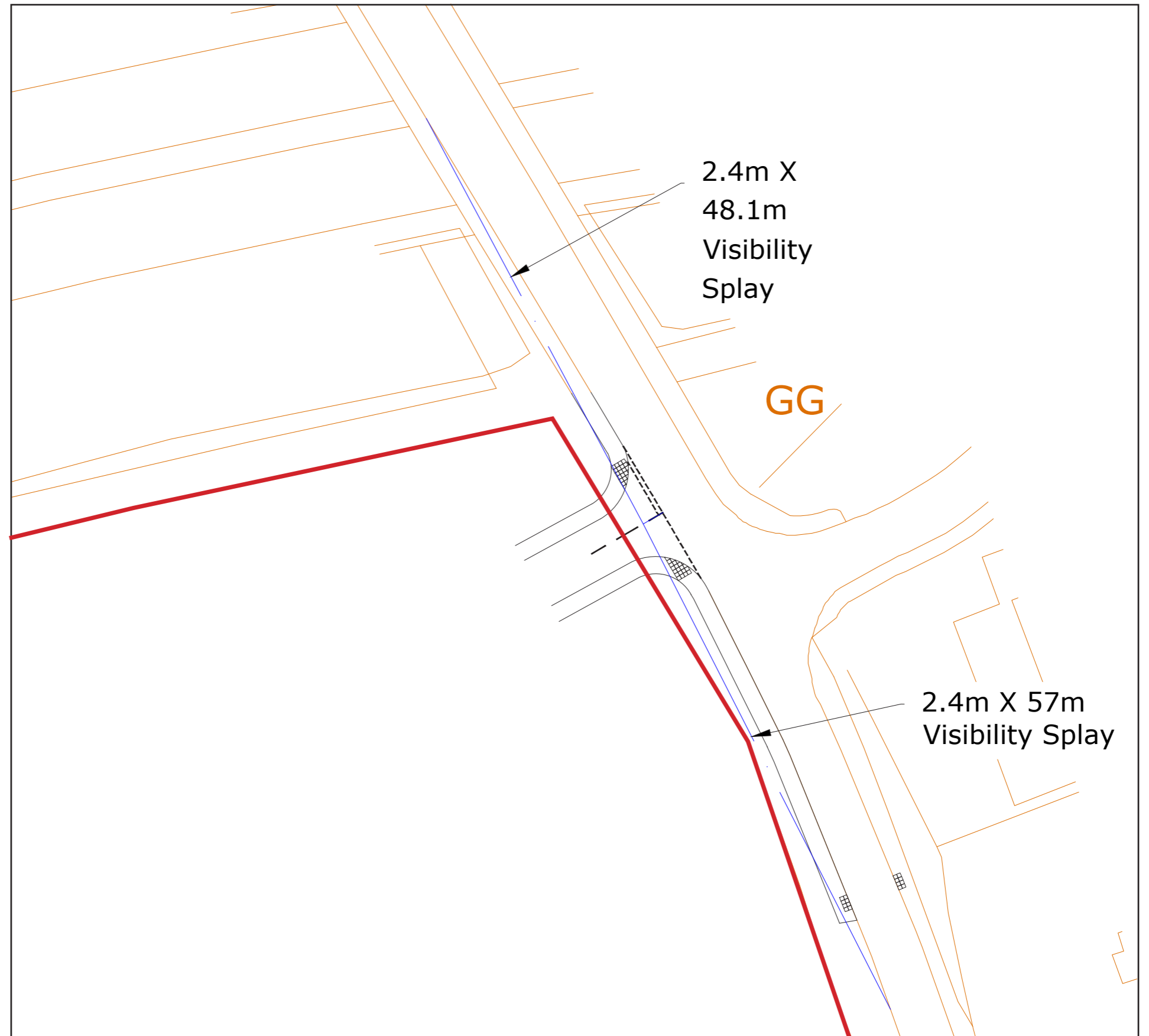
Access to the site will be from a new priority junction at the north-east corner of the site onto Headley Road. With the provision of a pedestrian footway, which would run along the western site of Headly Road in the vicinity of the access. The footway would connect with the existing footway along Headley Road to the north, whilst to the south there will be dropped kerbs and tactile paving to enable pedestrians to cross Headley Road.

The proposed access arrangements follow that of the previous application on site in 2015. Hampshire County Council (HCC), acting as the highway authority, did not raise any concerns in respect of the access design and traffic impact, subject to conditions.

It is considered that vehicle speeds past the site are unlikely to have materially changed since 2015, it is also considered that the same conclusions in relation to traffic impact will also remain. On this basis it is considered that the principle of the development in respect of highways is acceptable.

Parking on site will be provided fully in accordance with the relevant parking standards, and design guidance on parking across various planning policy documents.

EV charging will be provided in accordance with the relevant standards and policies, and bike storage will be provided to all units either through garages, sheds or communal bike storage.



Site Access Plan

4.02 FLOOD RISK / DRAINAGE

The entirety of the site falls within Flood Zone 1 and as such is a low risk of flooding from fluvial sources. The site is far enough inland not to be at risk of any tidal flooding.

The flood risk for surface water is considered low, development on the site will increase surface water runoff as expected when increasing impermeable areas. This will be controlled on site, to ensure that there is no increased flood risk elsewhere.

Drainage features will be incorporated into the scheme design to manage surface water run-off from development. These areas are shown on the masterplan and have been located in the most suitable areas topographically.

4.03 NOISE

A noise assessment was undertaken on 11th and 12th January 2024 by Hepworth Acoustics to evaluate road traffic noise from the roads adjacent to the site, including the A3. This included;

- Continuous noise monitoring in sequential 5-minute samples over a complete 24-period – in 7 locations to the A3.
- Continuous noise monitoring to B3004 Headley Road for a 3 hour day time period and then an 8 hour overnight period.

These assessments demonstrate that the noise levels from the A3 naturally reduce when moving away from the site boundary. This is due to the acoustic screening effects of the road lying in a cutting, as well as the effects of distance attenuation.

The noise survey sets out a number of mitigation measures to secure good acoustic conditions for future occupants in areas closest to the A3 and Headley Road. This includes;

- Maximise buffer to the A3 with access drives fronting onto the A3, this also allows gardens to be orientated away optimising protection.
- The use of acoustic fences/walls at garden boundaries where considered necessary through further refinement of the work.
- Acoustically rated glazing and ventilation systems specified based on the location of housing.

It is not considered that there are any noise constraints on the site that cannot be suitably mitigated, the same conclusions were drawn on the 2015 application where there was no noise related reason for refusal.

4.04 ECOLOGY

The site primarily consists of sheep-grazed modified grassland bordered by native hedgerows and treelines with mature trees. While the grassland holds little ecological value, the linear features, such as hedgerows and treelines, are deemed of relatively higher ecological importance, providing opportunities for commuting and foraging bats, Hazel dormice, and nesting birds. Surveys conducted in 2023 confirmed the presence of Hazel dormice and recorded relatively low bat activity, mainly comprising common and widespread species. A low population of slow worms was also noted along the site boundaries during reptile surveys.

The site's proximity to statutory designated areas, including the Wealden Heaths Phase II Special Protection Area (SPA) and Bramshott and Ludshott Common Site of Special Scientific Interest (SSSI), necessitates careful consideration of potential impacts and mitigation measures.

Natural England advises that, on the current Local Plan evidence base, the development is likely to have an effect of recreational disturbance to the SPA and would require mitigation to ensure that an adverse effect is avoided. It is considered that identifiable and deliverable opportunities exist to mitigate potential adverse effects at the SPA and SAC and since such mitigation opportunities clearly exist, the proposed allocation could safely be brought forward.

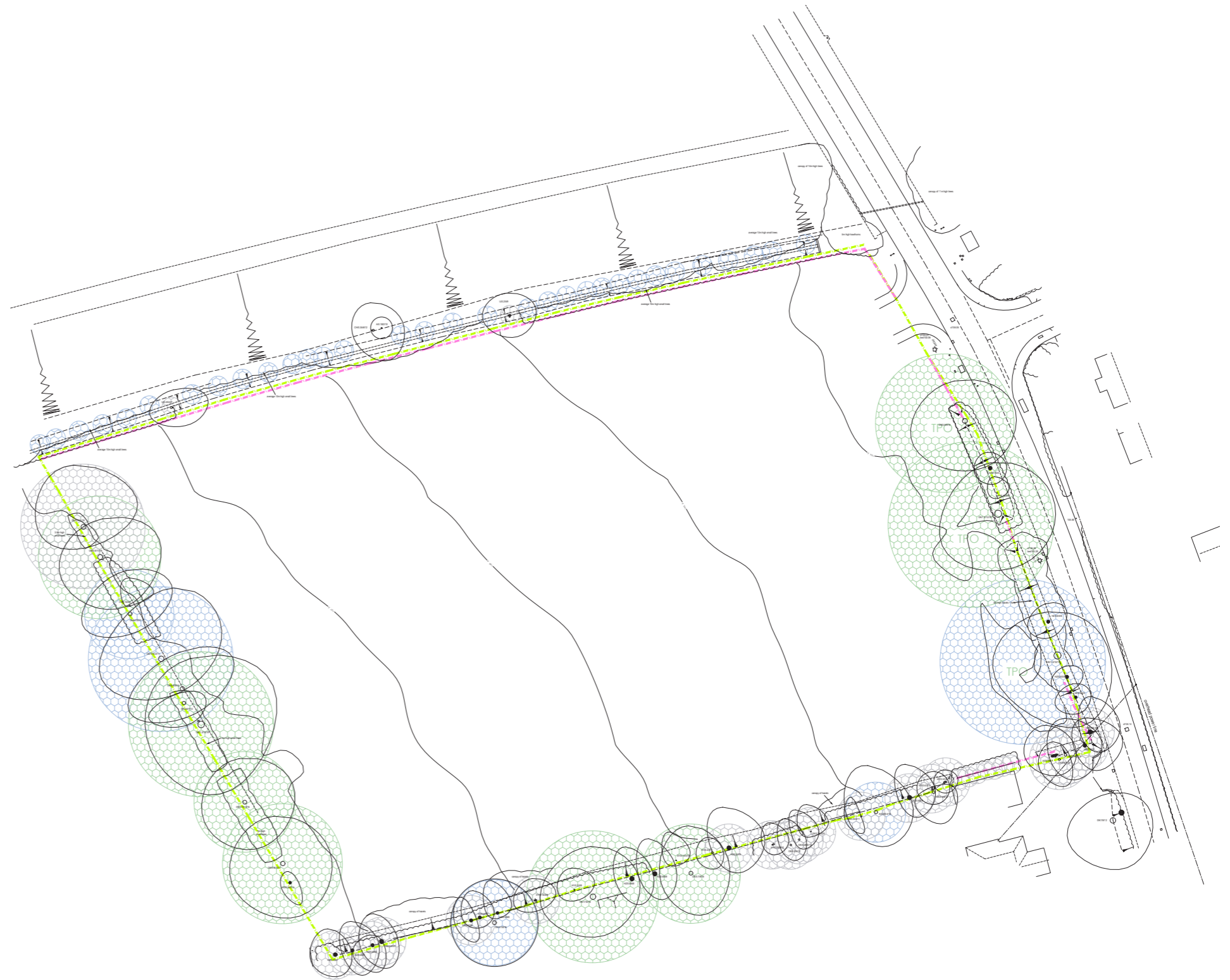
A Biodiversity Net Gain (BNG) assessment using the Defra Metric indicates the potential for an uplift of at least 10% in biodiversity value post-development, considering the low value of the existing grassland habitat. Overall, it is considered that a development scheme could come forward which includes an appropriate level of mitigation and enhancement measures, such that not only are adverse effects mitigated, but net benefits for biodiversity are realised.

4.05 ARBORICULTURE

The majority of trees on the Site are confined to the Site boundaries. The majority of the trees along the east, south and west fall within Category A and considered as of high quality with some Category B, of moderate quality. The boundary to the north is lined with Category B trees.




The consideration of tree constraints at an early stage seeks to reduce the likelihood of development-related impact on trees and provide significant opportunities for new tree planting throughout the site.

The proposal will retain all of the existing on-site vegetation along the site boundaries which will help to add to the surrounding landscape setting of the site. Additional green spaces and planting are also proposed which will significantly increase tree planting across the site and contribute to enhanced biodiversity and visual screening.



CATEGORY AND DEFINITION	
Trees to be considered for retention	
Category A	Trees of high quality with an estimated remaining life expectancy of at least 40 years
Category B	Trees of moderate quality with an estimated remaining life expectancy of at least 20 years
Category C	Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm

KEY

-  Root Protection Zone - Category A
-  Root Protection Zone - Category B
-  Root Protection Zone - Category C

Tree Constraints Plan

4.06 SUSTAINABILITY

Ensuring the scheme promotes sustainable transport modes will be at the core of the development. This will be achieved through creating an attractive development that has well-established pedestrian access links to Liphook village centre, encouraging movement by foot, bicycle and utilising the existing bus service. There will be a provision of bicycle storage on the site and electric vehicle charging points.

Sustainability and addressing the impacts of climate change are fundamental principles guiding the development. The proposal aims to deliver new homes that prioritize sustainability both now and in the future. Dwellings will be orientated to make the best use of natural daylight and sunlight.

Proposed constructions will optimise the building fabric, glazing, and structure to minimise energy consumption in the first instance by using low U-values and good air tightness, and ensuring that building services systems run as energy-efficiently as possible.

Enhancing the thermal performance of the building envelope helps to future-proof the structure and also yields the greatest CO₂ savings. Adding renewable technology will then yield maximum carbon reductions with lower long-term costs for home owners.

Following the proposed reduction in energy demand through fabric enhancements, the development will seek to reduce energy consumption further through the specification of mechanical and electrical systems with efficiencies that surpass the requirements of the Domestic Building Services Compliance Guide.

Dwellings will be designed and constructed in accordance with the amended Approved Document L1 of the Building Regulations which are part of the Government's road map towards a new Future Homes Standard in 2025, when all new homes will need to reduce emissions by at least 75% and the use of fossil fuel-based heating will be banned.



Air source heat pumps for efficient heating and cooling



EV charging points through out the site

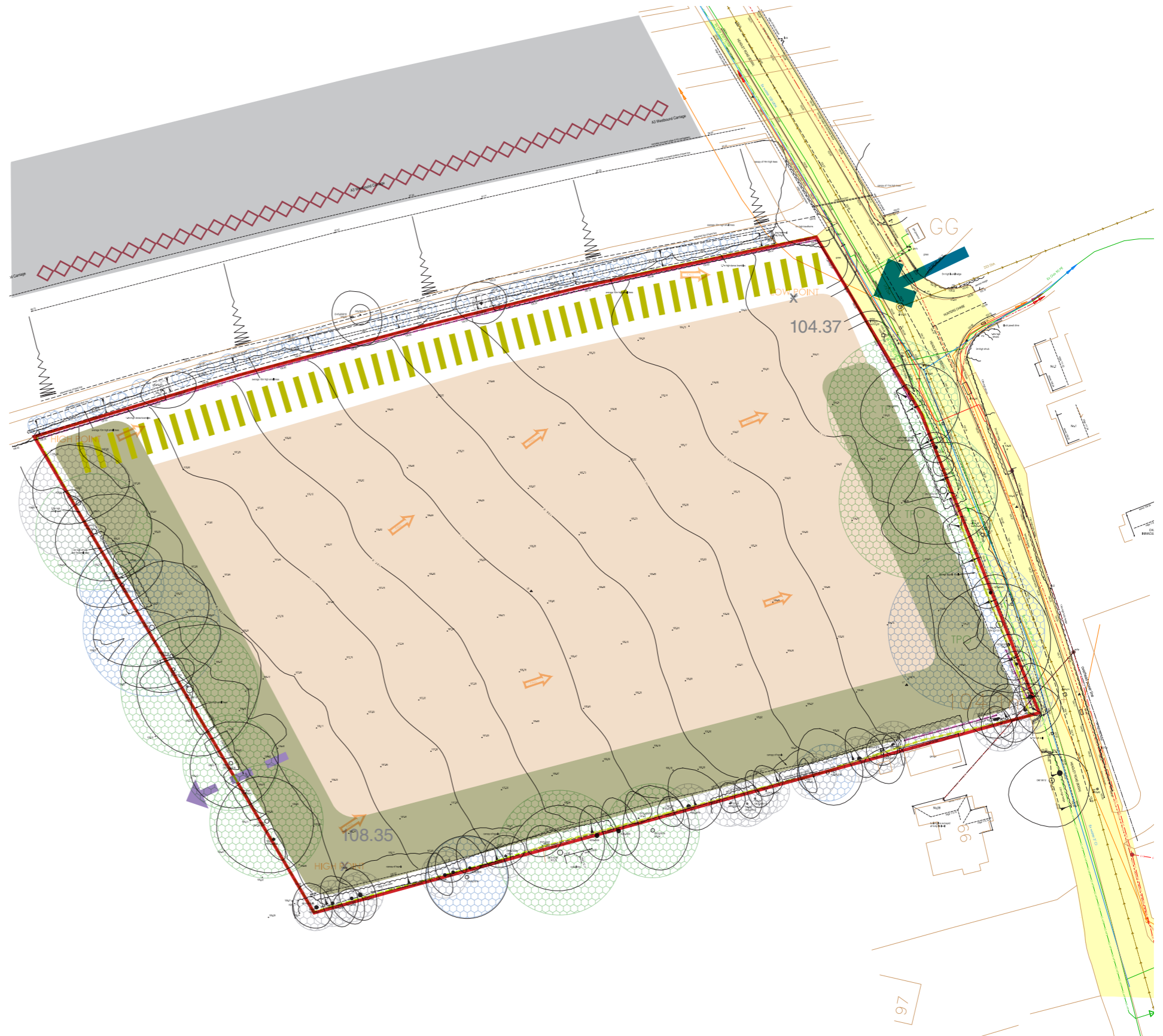


Local play spaces that encourage a connection to nature

5.01 CONSTRAINTS AND OPPORTUNITIES PLAN

As part of the assessment and design process, the constraints and opportunities presented by the Site have been analysed, which include:

- Opportunity to deliver a residential development within close proximity to existing amenity and public transport connections, with limited development constraints.
- The proposed scheme looks to introduce a new vehicular access from Headley Road, which will be carefully considered to take into account the existing landscaping and site topography to achieve the required visibility splays.
- The existing nature of the Site presents the opportunity to retain all of the existing vegetation which borders the Site and provide biodiversity corridors.
- Potential to improve biodiversity throughout the Site by introducing appropriate native planting species as part of the landscaping strategy.
- Retain the existing trees and hedgerows on the site boundaries to create green edges that screen the development whilst offering additional privacy to the proposed dwellings.
- The A3 to the north provides an opportunity to focus development towards the south, allowing for a landscaped buffer that can facilitate BNG enhancements and mitigate noise and pollution impacts.
- Opportunity for an east-west development layout to benefit from sustainable design principles.
- Opportunity to provide potential linkages and connect the Site to the adjoining SANG to the west to encourage healthy and active lifestyle.



KEY			
	Site Boundary		Root Protection Zone - Category A
	Developable Area		Root Protection Zone - Category B
	Site Access		Root Protection Zone - Category C
	Green Buffer		Ground Fall Direction
	Biodiversity Corridor		Connectivity to SANG
	A3 Carriageway		
	Noise Source		









Constraints and Opportunities Plan

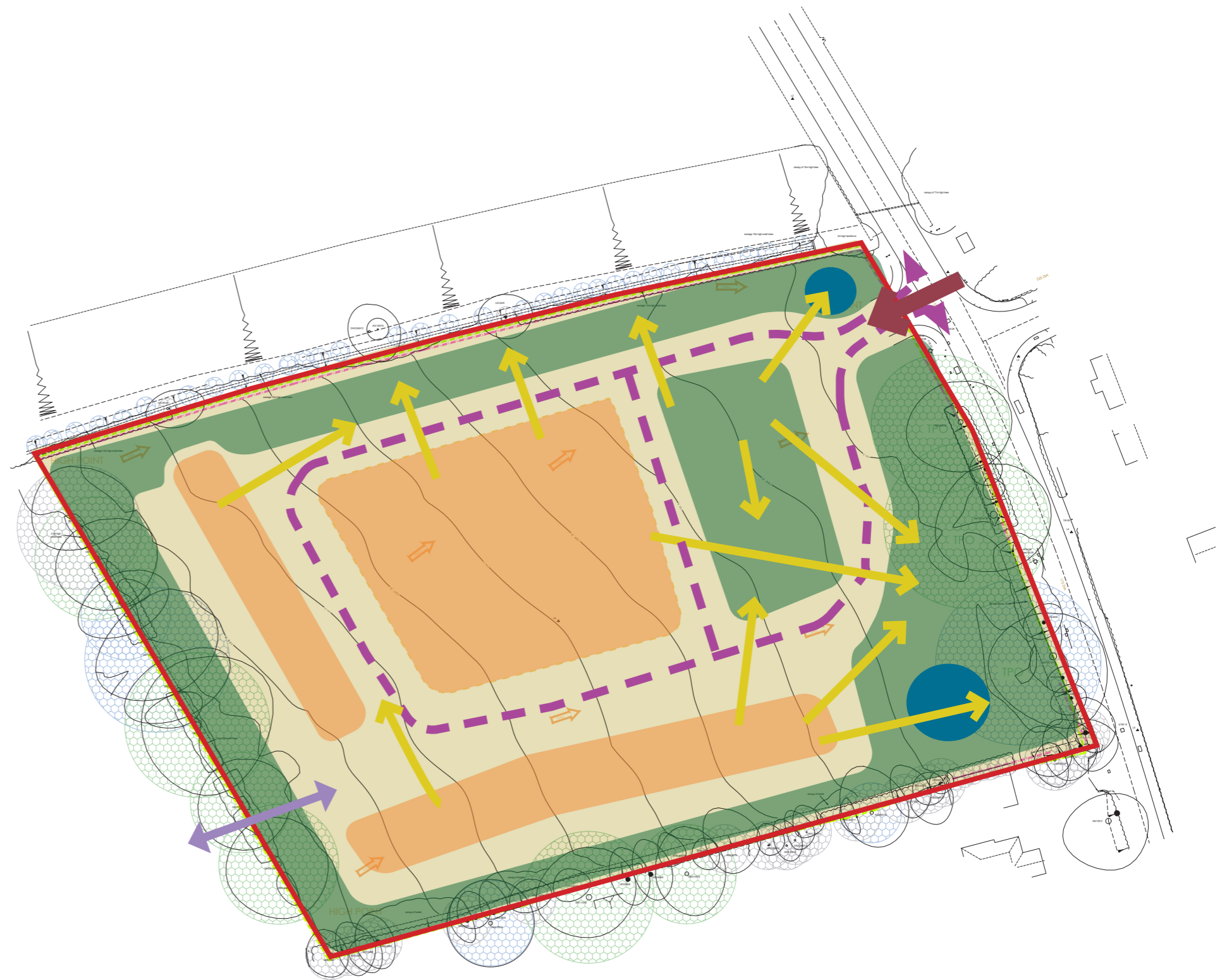
5.02 DEVELOPMENT PRINCIPLES

Following detailed analysis of the Site, its allocation and setting, a set of principles has come to the fore. Using this approach to form a layout will ensure a suitable design is proposed.

- A landscape led approach that focuses on the inhabitants connection with nature.
- Safe pedestrian and cycle routes that are easy to navigate and maximise connection across the Site.
- A landscape buffer that increases biodiversity and improves inhabitants enjoyment of the Site.
- An efficient road layout that enables easy access and navigation of the Site.
- A visual / physical connection to the SANG to the west.
- A sustainable drainage system that enhances the landscape.
- Internal views of green spaces across the Site.
- Development that optimizes this allocated site.
- Creation of a sustainable community.

KEY

-  Site Boundary
-  Housing
-  Site Access
-  Green Open space
-  Drainage feature
-  Internal Views
-  Potential Connection to SANG
-  Roads



Development principles applied to the Site

5.03 ILLUSTRATIVE SITE PLAN

The proposed layout accommodates 35 dwellings and will create a landscape-led and sustainable place to live that integrates with both the local community and the surrounding rural context.

- The scheme proposes affordable housing provision which will be of a high standard to further benefit the community. 14 units out of 35 (40%) will be affordable dwellings.
- The proposed layout takes account of the existing boundary and the surrounding land use by introducing a green corridor along the boundary to ensure tree retention and 10% biodiversity net gain.
- Provision of public open space along the north and eastern boundary with an opportunity to mitigate noise and pollution impacts from the carriageway.
- A new vehicular access point is proposed to the north-east of the site via Headley Road, which will also serve pedestrian and cycle access.
- The site layout will also be fully compliant in terms of parking provision, in the form of driveways, tandem parking, garages, and lay-by spaces for visitors.
- The site layout will incorporate a fully considered drainage strategy that will utilise sustainable drainage features such as swales and attenuation ponds. There is also an opportunity to introduce areas of permeable paving that will further help to deal with surface water runoff.
- Sustainability at the 'core' of the design and masterplanning approach.



Illustrative Site Plan

5.04 LANDSCAPE STRATEGY

The site comprises of 15,242sqm with 35.8% of open space made up of formal (769sqm), informal (3859sqm) and landscaping buffer areas (838sqm). Below are 3 local examples of housing fronting onto green open space, play space and drainage features. The relationship between housing and landscaping is key to the proposed site layout.

- KEY**
- Formal Open Space
 - Informal Open Space
 - Landscaping Buffer



Canada Way



The Firs



Lowsley Farm Drive



Open Space Site Plan

5.05 INDICATIVE VIEWS



6.01 SUMMARY

While the draft Local Plan proposes a quantum of 20 dwellings for the Site, the Vision Document illustrates that the delivery of up to 35 new homes is achievable while also providing new public open spaces to offer an attractive place to live.

A summary of the key benefits that the proposals of the Site can deliver include:

- The provision of market and affordable housing at a highly sustainable and well-located site;
- Provision of new public open space, green corridors and potential for new play area;
- Ecological and biodiversity enhancements, which based on emerging proposals can achieve at least a 10% biodiversity net gain.
- Provide a fully integrated sustainable urban drainage scheme with swales and balancing ponds.
- A landscape-led layout approach, which will include new planting across the Site and a positive relationship between housing and open space.

Reside looks forward to working with East Hampshire District Council, the community and key stakeholders into the next stages of the Local Plan and will actively and positively engage with the EHDC to discuss how the Site can best come forward to meet the Council's draft allocation of the Site.





PROJECT: Headley Road, Liphook 333100919 DATE: 06/03/2024

SUBJECT: East Hampshire District Council Local Plan Regulation 18 (Part 2) Consultation (Sent on behalf of Ed Hanson) TRANSMITTAL ID: 00001

PURPOSE: For Your Information VIA: Info Exchange

FROM

NAME	COMPANY	EMAIL	PHONE
██████████	██████████	████████████████████	

TO

NAME	COMPANY	EMAIL	PHONE
localplan@easthants.gov.uk		localplan@easthants.gov.uk	

REMARKS: **SENT ON BEHALF OF ED HANSON**

Dear Sir/Madam

East Hampshire District Council Local Plan Regulation 18 (Part 2) Consultation.

Please find attached a representation submitted on behalf of Reside Developments Ltd in respect of Land West of Headley Road, Liphook.

I trust this information is of use. Should you require anything further, please do not hesitate to ask.

Your faithfully

██████████

DESCRIPTION OF CONTENTS

QTY	DATED	TITLE	NOTES
1	06/03/2024	240306 FINAL EHDC Regulation 18 Reprs.pdf	

COPIES:



(Stantec UK)

Transmittal

DATE: 06/03/2024
TRANSMITTAL ID: 00001

From: [REDACTED]
Sent: 05 March 2024 15:42
To: [EHDC - Local Plan](#)
Cc: [REDACTED]
[REDACTED]
[REDACTED] Deerleap, The
Green, Rowlands Castle, PO9 6BW Objection to RLC 1 & 2
Attachments: [East Hampshire District Local Plan_Reg18 Draft_ Representations on
Deerleap. 04.03.24 Final.docx](#)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Done, Heather, Consultation Responses

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

This email forms the objections of [REDACTED] of Deerleap, 17, The Green, Rowlands Castle, PO9 6BW to the housing allocations at Deerleap North (RLC1) and South (RLC2) as part of the EHDC reg 18 draft Local Plan consultation exercise. Attached to this email are statements prepared by [REDACTED] (Planning Consultant) and [REDACTED] (Heritage Expert). Both statements relate to RLC1 & RLC 2 as it is considered that it is that they can only be developed together, largely for the reason set out by the Draft Plan itself in its description of RLC1.

If the Council has any comments or queries, please do not hesitate to contact Stuart Robinson as per the details set out below

Please send an acknowledgement confirming the safe receipt of this email and the two attachments. They have also been submitted via the Commonplace portal.

Kind Regards

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

East Hampshire District Local Plan (Reg 18 Draft)

Housing allocations at Deerleap, Rowlands Castle (RLC1 & RLC2)

Stuart J Robinson DipT&CP MRTPI

I am a Chartered Town Planner and freelance planning consultant representing [REDACTED] the owners of Deerleap, The Green, Rowlands Castle.

1) Introduction

In this statement I provide a planning assessment of allocating the housing sites at Deerleap in the reg 18 draft Local Plan, (RLC 1 & RLC 2). I believe that the two sites have to be considered together, as I will explain later.

Where appropriate, I draw upon the accompanying Heritage Statement prepared by [REDACTED], a former Head of the Building, Conservation and Research Team at Historic England and East Hampshire District Council's first Conservation Officer.

In this statement, I firstly consider the conservation issues including the history of how these sites have been considered in a planning context in recent times including by Government Inspectors, followed by an assessment of other material planning considerations. I then provide my conclusions.

2) Conservation and settlement policies;

Conservation Areas themselves are, according to the NPPF, 'designated assets'. The policy states (para 205) that when considering the impact of a proposed development on the significance of a designated heritage asset "great weight should be given to the asset's conservation."

Section 16 of the NPPF in relation to the importance of protecting heritage assets and para. 196 stresses the need for plans to set out "a positive strategy for the conservation and enjoyment of the historic environment" and that the strategy "should take into account the desirability of sustaining and enhancing the significance of heritage assets".

I consider that there is a very significant objection to the allocation of these sites on conservation and heritage grounds. This is highlighted in the accompanying statement written by [REDACTED]

██████████ states that a housing allocation on this site will;

- 1) have a significantly detrimental impact on the character and appearance of the Conservation Area,
- 2) erode the rural aspect of the views from the heart of the village and the Conservation Area, and
- 3) cause actual harm to a designated asset, namely the Scheduled Ancient Monument and be likely harm to a non-designated assets, namely the flint wall which runs along the village green and The Green itself.

In my experience of nearly 50 years in planning, rarely have I come across a situation where the appearance and character of a Conservation Area and indeed, the village itself, is defined by *one* component namely The Green at Rowlands Castle. Fundamental to the uniqueness of The Green is firstly, its size (the largest in Hampshire) and elongated shape of the protected village green but more uniquely, it is characterised by the flint wall, which runs along the long southern boundary, with its verdant backdrop provided by the trees in the woodland behind. This last feature is often described as a 'rural edge' to both the Conservation Area as well as the village itself.

Rowlands Castle was designated a Conservation Area in 1976 and it's official description states;

"On the South side [of The Green] the high flint wall of Deerleap...plays an important part in creating the character of the Conservation Area. The grounds of Deerleap are a basic landscape component to the village and form a firm rural edge to its southern side, as a separation from neighbouring settlements and a contrast to the built form encircling The Green. "

Note; At the time this was written "the grounds of Deerleap" included both sites now being allocated for housing.

The Conservation Area has generally remained intact since its designation. The reg 18 Draft Plan however envisages housing allocations in over a quarter of its area (27% according to the Parish Council's figures). This in itself, poses a significant threat to the appearance and character of the Conservation Area, which is quite closely defined around the village core.

This is, in addition to the specific threat to the character and appearance of both the Conservation Area and the village itself, posed by RLC1 & RLC2, the two Deerleap sites, which both ██████████ and myself consider to be most serious.

As the draft local plan acknowledges, both allocations RLC1 & RLC2 have to be considered together because a development on RLC1 cannot be accessed directly except by breaking through the flint wall described above. That would add yet *another* seriously harmful impact on the Conservation Area which should not be contemplated having regard to the clear conservation and heritage harms that would arise. As [REDACTED] says in para 4.4 of his statement,

“Any proposal to demolish part of the wall would not only significantly harm this heritage asset, it would also destroy the rural view and make any residential development even more conspicuous.”

Thus the only way the RLC 1 site can be accessed in practicality is from the south through RLC 2 so the two must be considered together.

Incidentally, it is interesting to note that the text supporting the allocation of RLC 1 fails to even mention how its impact on the Conservation Area might be mitigated and refers in the site description to a “brick boundary wall” both of which suggests its consideration of the Deerleap north site is somewhat flawed (my underlining).

Clearly by effectively combining RLC 1 & 2 together, there is a real likelihood that the scale of the allocation would grow along with the inevitable unacceptable impact on the Conservation Area.

Not only that, the impact of the allocations, either on their own or together will detrimentally affect the perceived rural edge of the village, will thereby undermine other planning policies designed to;

- i) avoid actual or perceived coalescence of settlements (Reg 18 Draft Local Plan Policy S2.3),
- ii) respect important landscape features and existing recognised design guidelines (Reg 18 Draft Local Plan Policy DES 2.1 notably criteria a, b, e, & g) or more specifically,
- iii) separate Rowlands Castle from Havant to the south (e.g. Rowlands Castle Neighbourhood Plan Policy P1).

Conservation Planning History

a) Appeal Decisions

There have been attempts in the past to secure development on these sites and the way they have been dealt with before is also of relevance to the consideration of these allocations.

Two Government Inspectors have previously turned down the prospect of development at Deerleap because of the importance of the flint wall and the trees behind as being a key component of the character of the village green and the Conservation Area. These decisions also refer to how this element forms a rural edge to the village green and separates it from neighbouring settlements.

The first of these was in relation to a planning appeal in 1997 against a fairly modest scheme of six houses and a garage extension close to the house at Deerleap. In para 13 of the decision letter the Inspector states;

“In my opinion, the largely undeveloped nature of the site, as part of the grounds of Deerleap, forms an important component of the character of the area, by contributing to the rural setting of the village. The substantial area of built development, with the associated garden areas and thus also attendant household paraphernalia, would I believe have a distinctly suburbanising influence. In my judgement, this development would represent considerable encroachment into the generally open land about Deerleap, with a consequent adverse impact upon the character of the area and the setting of this part of the village. For these reasons, I am satisfied that this proposal would not preserve or enhance the character or appearance of the Conservation Area.”

(Para 13 of the decision letter; appeal ref; T/APPM/1710/A/96/270131/P9)

b) Local Plan Review 2006

In 2006, the EHDC included the northernmost site at Deerleap (similar to RLC1) in its Local Plan Review as a housing reserve allocation. At the same time Fastnet Properties also proposed housing development on a the southernmost site (similar to RLC2).

The Inspector categorically dismissed both proposals and his reasons are set out in full in the appendices to the representations to the reg18 Draft Local Plan by the Rowland’s Castle Parish Council. Suffice to say that this Inspector concurred with his colleague on the 1997 appeal in attributing considerable importance to The Green as the historic centre of the village and the contribution made by the grounds of Deerleap.

The Inspector, was not persuaded that development *“could be undertaken in such a way as to preserve or enhance the character or appearance of the Conservation Area.”*

(para 5.4.37). Despite the proposals incorporating some screening and the argument put forward that the development could be made attractive, the Inspector responded by saying, *“That is not enough. It is important to have regard to its actual presence, especially when a vital criterion is the effect on the Conservation Area.”* (para 5.4.38). The Inspector recognised the importance as regards the role that the Deerleap grounds play as a vital component of the Conservation Area and agreed with the views of the previous appeal Inspector regarding the *“special qualities of the Conservation Area and the harm that residential development would have on it.”* (para 5.4.39)

The Inspectors conclusion on the site's proposed allocation was; *"Irrespective of the degree to which it might be seen, the actual presence of development on this Reserve Site would materially detract from the open character of this part of the Conservation Area, and from that Area in its entirety. It would irretrievably erode the firm rural edge of the Conservation Area and the setting of the village hereabouts to a degree that would be profoundly harmful to both. Development of this land as proposed would fly in the face of the relevant legislation that is designed to protect these Areas. It should not be countenanced."* (para 5.4.40; with my underlining)

The proposal by Fastnet Properties for the southern site was dealt with similarly with the Inspector concluding that "the land should be kept free of buildings." (para 5.4.62)

c) Local Plan Review 2015-2016

Given the strength of this judgement, it might seem surprising that Fastnet Properties, undaunted, put forward the same (southern) site at Deerleap for inclusion as housing in 2015 the East Hampshire District Local Plan, Housing and Employment Allocations. The company argued that allocations made by EHDC on the former brickworks and to the west also off Deerleap Lane, formed an enclosure of their site and warranted its inclusion into the former housing allocations.

However the Inspector, in his report in February 2016, considered the housing allocations made in the plan were sufficient and decided not to give this proposal any consideration (para 76). The Inspector clearly saw no need to extend the allocations to include Deerleap, and concluded that he did not need to deal with Fastnet's representations because the level of housing required did not warrant it.

d) Neighbourhood Plan 2023

Since that time the Rowlands Castle Neighbourhood Plan has been prepared by the Parish Council. Part of the background work involved the Rowlands Castle Settlement Character Assessment. In looking at the core of the village it found that the sense of space on the village green and the backdrop of the mature trees provided two of the four important key characteristics. The flint boundary wall of Deerleap was also included.

A study on 'locally significant views' was also prepared which cited the view south from the village green towards Deerleap as being one of only six identified views considered significant in the Conservation Area.

In the Neighbourhood Plan itself, Policy 1 refers to maintaining the gap between Rowlands Castle and Havant and rural aspects of that gap. Although there has been development south of Deerleap the perception provided by being in the Village Green is that the flint wall forms the rural fringe of the settlement. This was mentioned in the Conservation Area's 1976 assessment as well as by both Inspectors involved in the housing appeal 1997 and the Local Plan in 2006 as being of significance, thereby demonstrating a thread of consistent policy decision making.

Policy 2 of the Neighbourhood Plan specifically addresses the protection of the landscape character and the protection of locally significant views. The third clause states that, *"Development proposals which would have an unacceptable impact on a locally significant view will not be supported."* (Rowlands Castle Neighbourhood Plan Policy 2 (3)). The view looking south from The Green toward Deerleap, mentioned above, is classified as C6 under this policy and therefore protected.

Policy 4 is also relevant as it seeks to protect non-designated assets specifically indicating that the flint wall is to be included. Furthermore the wall benefits from additional protection from the fact that the grass verge in front of its northern face forms part of the official Village Green, as declared in 1996. The Green thereby enjoys separate, statutory protection from the Secretary of State.

The Neighbourhood Plan was approved by an appropriate referendum of residents and subsequently the East Hampshire District Council, in September 2023. The document, including its policies, accordingly become a material considerations in assessing the proposals in the reg 18 Draft Local Plan. However, there is scant evidence, in the latter document, that the Neighbourhood Plan has been duly considered in relation to the allocations at Deerleap.

e) Analysis of Planning History

The planning history indicates a consistent approach taken by planning decisions and policymaking with regard to the Conservation Area and the contribution that the Deerleap land makes to its appearance and character as well as with the policies which seek to protect the southern edge of the settlement. The housing allocations at Deerleap (RLC1 & RLC) however would appear to be totally inconsistent with this approach.

The analyses by the two Inspectors indicate quite clearly, and [REDACTED] also agrees, that the impact of development, even for a low density scheme, would be impossible to mitigate because of the difficulty of screening out any visual impact of built development (made even more problematic by the ground rising steeply to the south). It would also destroy the perception of the rural edge to The Green, an aspect considered important to character of the village core, the Conservation Area, as well as the settlement policies contained in both the reg18 Draft Plan and the Neighbourhood Plan and cited above.

I have considered whether there has been any material change in circumstances since the Inspectors' decision outlined above. In fact, during one of the public consultation events, I enquired as to what changes the Council might have considered to justify the inclusion of RLC1 and RLC2 given the consistent approach outlined above and the opinion of the Local Plan Inspector in 2006, who stated that development "should not be countenanced" on these sites.

The response I received from one of the Officers in attendance was that;

- 1) The Council is concerned with the housing supply in the District; and
- 2) New government policies on sustainability means that more emphasis must be place on using sites better served by public transport.

I agree that both these are material points. However, given that the Council are proposing only 13 dwellings on both sites, the allocation in the Local Plan at Deerleap, will clearly not have a material effect on either of these, particularly the need for housing.

Furthermore, in my view, if the principle of development here was accepted, it would be more difficult for the Council to later resist proposals for a larger, more dense scheme (as has happened elsewhere in the village). This would mean that the environmental and conservation impacts would be far more severe than currently anticipated here.

In relation to second point, if the Council has brought forward these sites because of their apparent proximity to local services in the village, I would query whether the planning authority have thought through the effect of the need to retain the flint wall intact. As ■■■■■ maintains this wall is a non-designated asset considered of significant importance in the Conservation Area, the Neighbourhood Plan and by two Planning Inspectors and should not be breached. As a result, residents of any new development will have to actually travel at least 400m from the nearest possible access along Deerleap Lane before they reach any local amenity. This will reduce the accessibility of local services by walking and means that the sites' sustainable advantages, are not so attractive as they might appear on a map.

In my opinion therefore, there are no material changes that can be used to justify development of the Deerleap sites such as to outweigh the very clear harm to the Conservation Area and settlement policies which it would cause. I now turn to consider other relevant planning issues.

3) Wildlife and Biodiversity;

The site is designated as 'Wood pasture and Parkland BAP (Biodiversity Action Plan) Priority Habitat (England). Wood pasture and parkland are mosaic habitats valued for their trees, especially veteran and ancient trees and the plants and animals that they support. Thus the site has a significant biodiversity value. Policies NBE2: 'Biodiversity, Geodiversity, and Nature Conservation' and DM2: 'Trees, Hedges and Woodland' will apply. The site is also designated as: National Habitat Network All Habitats Combined (England Network Enhancement Zone1).

The 'Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan – April 2015' stated for site 'RC002 – Land at Deerleap' noted the potential for the site to have value for biodiversity, given that 'it has a meadow grassland character, and is surrounded by a wooded landscape to the south'. Clearly combining the two sites together would provide a total area of 2.4 ha which would have a greater value for biodiversity. Apparently, this exercise was part of the justification as to why the land at Deerleap was not allocated in the East Hampshire District Local Plan - Housing and Employment Allocations Plan' – April 2016.

The Deerleap sites still form important habitat for flora and fauna and protected species including great crested newts, dormice, various snakes, birds and bats inhabit the area. The concern is that, in addition to the potential impact that development may have on the internationally designated sites in the Solent (which are acknowledged by the Council) that it will also endanger other protected wildlife in this location, at a time when its importance is becoming more widely recognised. This is highlighted by the Environment Act 2021 which recently came into force.

The two recent housing estates built in the vicinity of Deerleap, in and around the former brickworks to the south, have already, according to local residents, disrupted local wildlife, moving it into unsuitable habitats such as peoples' gardens and homes. Moreover, the mitigation works, designed to protect these species, I am advised by local residents, have not been constructed or maintained in accordance with planning conditions pursuant to these housing permissions. This leaves one to consider whether the local authority is able to protect wildlife at all once it is disturbed in this way.

4) Flooding;

The local authority already acknowledges that these sites are within or adjacent to an area known to suffer from regular flooding (located in Flood Zone 2). The inclusion of more hard surfacing associated with residential development here, sitting above a road which floods regularly, will clearly increase "run-off" flow and exacerbate the problems which all too frequently arise.

5) Drinking water quality:

The sites are also within an area which requires protection and safeguarding given the aquifers which are known to exist here. As a result the site is within a groundwater source protection zone (SPZ1), any development must comply with Policy NBE13: 'Protection of Natural Resources'.

6) Access:

As mentioned earlier, access of any sort could only come via Deerleap Lane, which is already an overly utilised road given its restricted width and alignment with a pinch point just to the north of where the road is at the same grade as the site.

There has already been a fatality at the junction with Redhill Road as well as a number of other reported accidents. Moreover the alignment to Deerleap Lane as it curves around the southernmost of the two sites, which is the only part of the road at the same grade of the site, does not lend itself to creating sufficient visibility splays and the concern is that the new junction can only cause an additional hazard.

7) Scheduled Ancient Monument;

The sites are also adjacent to Rowlands Castle (a scheduled ancient monument) and any development will detrimentally affect the setting of this protected heritage asset as explained by ██████████ in his statement, where it intrudes onto the earthworks that surround it (para 5.6).

Furthermore, ██████████, raises concerns that the Deerleap South site (RLC2) is important archaeologically, not just in relation to the Castle but also to the site of the former Roman brickworks. He suggests in paras 5.4 and 5.5, that a desktop study here would be insufficient given the high likelihood of discovering remains which would cast more light on the history of this ancient settlement.

8) Conclusions

In my view, the allocation of housing allocations at Deerleap, both RLC1 & RLC2, demonstrate an insufficient regard for the Rowlands Castle Conservation Area in which they make up part of the single most important component. Indeed any development here will significantly cause harm not only the character and appearance of the Conservation Area but also that of the village itself.

Moreover, by damaging the one of the Conservation Area's most important features, namely the rural edge of The Green, behind the flint wall, development at Deerleap will undermine strategic policies designed to prevent the village from coalescence with other settlements.

The conclusion that development here would have such a damaging effect was held by two Government Inspectors who both confirmed the important contribution which the Deerleap sites made to the Conservation Area and the village's settlement boundary. The Inspector in 2006 went so far to say that development "should not be countenanced."

The Inspector in the last Local Plan Review in 2016 did not consider such a proposal for a housing here merited revisiting.

More latterly in 2023, there was a referendum and a decision which endorsed the Rowlands Castle Neighbourhood Plan by both the local residents and the Council. This plan endorses these Inspectors' decisions and places a high level of importance on maintaining these key components of the Conservation Area.

Given such a high bar, there has to be some significant change in material circumstances to warrant an alteration in approach, given that Government legislation and planning policy places such importance on conservation and heritage, as well as consistency of decision making.

Despite the issue of housing need and sustainable development, the draft Local Plan allocation of a mere 13 houses here strongly suggests to me that the level of impact on the Conservation Area and settlement polices cannot possibly be justified by such a paltry benefit.

Moreover, the presence of a high level of biodiversity and significantly important wildlife on these sites (including evidence of protected species) both of which are the subject of increased importance, as demonstrated by recent changes in Government legislation and planning policy, warrants a higher level of protection to be given to both sites.

Indeed, there is also the problems that development here would cause to archaeological remains, the setting of a scheduled ancient monument as well as exacerbating existing flooding and water quality problems.

All of these material considerations, particularly the role that these two sites play in terms of contribution to the Rowlands Castle Conservation Area, strongly confirm that as far as the draft Local Plan is concerned, there is no scope for any development at Deerleap. Indeed I consider the evidence suggests that the Council should consider imposing a higher level of protection in relation to these two sites which will ensure the preservation of Deerleap as a rural oasis within the heart of the village.

In light of the above, I am firmly of the view that the housing allocations in the reg 18 Draft Local Plan at Deerleap are profoundly flawed and the proposals that form RLC1 and RLC 2 should therefore be abandoned.

East Hampshire District Local Plan (Reg 18 Draft)

Housing allocations at Deerleap, Rowlands Castle (RLC1 & RLC2)

FSA

I am the former Head of the Building Conservation & Research Team at Historic England/English Heritage having spent 26 years at the organisation. Prior to that I worked for 5 years in private architectural practice which followed over 10 years as a conservation officer; most of it working as East Hampshire's first appointment in the role.

I am representing [REDACTED] of Deerleap, Rowlands Castle in relation to allocations adjoining their property and my statement below should be read in conjunction with that of [REDACTED] their Planning Consultant.

1 Introduction

1.1 In this statement I consider the impact that the proposed housing allocations have on the Rowlands Castle Conservation Area and in particular on the designated and non-designated assets.

2 Rowlands Castle Conservation Area

2.1 Rowlands Castle Conservation Area was designated in 1976 by East Hampshire District Council. It focuses on The Green which is fronted on the north side by attractive mainly late C19th buildings and to the south by a substantial flint wall which is over 3 metres in height. This wall forms a strong visual boundary but its appearance is made more subtle by the presence of large trees and shrubs on either side which both screen and cast shadows upon it. Although parts of the wall have been rebuilt over the years, some very high quality flintwork and galletting survives especially to the SW of the Deerleap boundary (N edge of proposed housing allocation RLC1). It is possible that the wall may have been a prestigious estate boundary.

2.2 The trees which stretch further into the land south of the wall create a strong rural aspect to this part of the village. This is an important feature of the character of the conservation area as it links the village to more open countryside beyond. No buildings are listed although Deerleap which is hidden behind the flint wall contain elements that pre-date the C19th.

2.3 A conservation area is defined as 'an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'. The character of an area can mean a particular combination of qualities or features that makes them or it, different from others (sometimes qualities that cannot be seen), qualities that are interesting and unusual. Such features include evidence of past settlements or historic events which add considerable significance to a conservation area. The original EHDC conservation area leaflet for Rowlands Castle referred to the

C19th housing and the large flint wall creating the character of the conservation area, but equally significant is the hidden history which exists in the land to the south of the Green. This is the land that is subject to the proposed allocation for two sites RLC 1 & RLC2.

- 2.4 The distinctive topographical remnants of the site of the C12th motte and bailey (scheduled monument) are quintessential elements of the conservation area, particularly as the village is named after this feature. Finds and desk tops studies also point to Roman deposits suggesting tile and possibly brick making as well as a possible roadway linking Havant to Chalton and Buriton. This land provides a rural aspect and important gap when viewed from The Green, but it was also the historic heart of the settlement and therefore a vital part of the conservation area.

3 Policies

- 3.1 The importance of the sites RLC1 and RLC2 in relation to their contribution to the Conservation Area have been reflected in a number of recent policies and planning decisions.

Rowlands Castle Neighbourhood Plan (NP) (adopted by EHDC):

Policy Objective 1 of NP Policy 3 – Local Green Spaces and Protected Open Spaces

‘The character of Rowlands Castle Parish owes much to its close relationship with the surrounding countryside and to green areas within the village’.

Policy Objective 1 of NP Policy 4 – Historic Environment: Non-designated Heritage Assets

– ‘to conserve and enhance the heritage assets, both designated and non-designated together with the historic significance of their setting within the Plan area’.

- 3.2 Policy Objective 2 of NP Policy 2 – Landscape Character and Views

– ‘to maintain the distinctive landscape vistas and the visual connectivity between the surrounding countryside and the built environment’.

Policy 2.3 – *‘Development proposals which would have an unacceptable impact on a locally significant view will not be supported’.* View C6 of the flint wall and trees and rural setting beyond will be affected by both proposals.

- 3.3 Policy 4 – Historic Environment: Non-Designated Heritage Assets

- ‘The effect of a development proposal on the significance of a non-designated heritage asset should be taken into account in determining planning applications. In weighing applications that directly or indirectly affect the non-designated heritage assets identified in this policy, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage assets’. The Plan identifies a number of non-designated heritage assets including No 7 the Flint Wall at Deerleap.

3.4 East Hampshire Local Plan Inquiry 2005 HAR 12 Inspectors Report:

In removing the proposed allocation for 30 houses (on an area similar to RC1) he concluded:

'I am not persuaded that it could be undertaken in such a way as to preserve or enhance the character or appearance of the conservation area'.....'the site is enclosed by trees and hedges and would not be so noticeable in summer but would be in winter, especially from the access road' (para 5.4.37).

3.5 The National Planning Policy Framework (NPPF) published by the Dept for Levelling Up, Housing and Communities sets out the Government's planning policies for England and how these should be applied. Section 16 provides guidance on conserving and enhancing the historic environment.

3.6 Para 196 states that *'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account.....b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.....d) opportunities to draw on the contribution made by the historic environment to the character of a place'*

3.7 Para 205 – *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. As a scheduled monument, Rowlands Castle enjoys the highest form of designation. This emphasises why this site is so important to the history and therefore character of Rowlands Castle.*

3.8 Para 206 states that *'Any harm to, or loss of, significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of;*

b) assets of the highest significance, notably scheduled monuments.....should be wholly exceptional'.

4 Proposed Allocations RLC1 – Deerleap North

4.1 Housing – including the normal paraphernalia of domestic life – would make this development visible from The Green and therefore severely harm the rural view that now exists. This view creates a very important perception that the highpoint of the site to the south continues into countryside beyond, which for centuries it did. It provides a welcome and sylvan aspect within a conservation area which, apart from The Green is dominated by buildings and the railway. This is a key feature of the conservation area which has been recognised in policies, guidance and planning decisions and would be destroyed if residential development is permitted.

- 4.2 Even though the flint wall is roughly 3 metres in height the dwellings would have to be single storey, possibly with flat roofs and be set to the south end of the site to minimise their visual impact. This form of development though is most unlikely to be acceptable at this location within the conservation area. However, the land rises to the south which may make any dwellings more obvious. Only 5 dwellings are proposed so it is questionable whether it would be viable. However, if the number of houses are increased then it is likely, in my experience, that the harm to the character and appearance will be that much greater.
- 4.3 The strong boundary to The Green provided by the wall would be severely diminished by any visible developments. Occupants of any dwellings on the site would presumably be responsible for maintaining the flint walls and may well be tempted to insert gateways for pedestrian access which would further diminish the significance of the wall as a historic and defining boundary.
- 4.4 A further harmful possibility is that a developer of RLC1 might seek to gain vehicular access from The Green by demolishing a section of the flint wall. Otherwise access would have to be gained from RLC2 which means that both sites would either need to be developed together or phased. Any proposal to demolish part of the wall would not only significantly harm this heritage asset, it would also destroy the rural view and make any residential development even more conspicuous.
- 4.5 Development of RLC1 would harm the appearance and character of the conservation area and would certainly not preserve or enhance it.

This view was endorsed by the Inspector at the 2005 Local Plan Inquiry – *‘the openness of the gardens including the paddock (RC1) is crucial to any appreciation of that character and appearance. Development is not precluded in the conservation area but the 1990 Act section 72 requires in essence that a scheme must preserve or enhance the special qualities that led to its designation.....It would irretrievably erode the firm rural edge of the conservation area and setting of the village hereabouts to a degree that it would be profoundly harmful to both. Development should not be countenanced’* (paras 5.4.39 – 5.4.40).

He also criticised EHDC’s reliance *‘on the likely appearance of development. That is not enough. It is important to have regard to its actual presence, especially when a vital criterion is the effect on the conservation area’* (para 5.4.38).

- 4.6 It is difficult to understand how residential development on either site will fulfil EHDC’s duty to preserve or enhance the special qualities of the Conservation Area, when those include the open, rural aspect of the land when viewed from The Green.

5 Proposed Allocations RLC2 – Deerleap South

- 5.1 The site sits several metres higher than RLC1 and The Green which means any development would be visible from the north. Very little screening is offered by trees as much of the site has been cleared leaving very low-level vegetation. However the trees to the north and on the southern boundary maintain the verdant view from

The Green which is so important to the character of the conservation area. Development of this site would be even more noticeable than on RLC1 as it is many metres higher. The urban appearance of housing here would bring further harm to the appearance and character of the conservation area for the same reasons given in para 4.1.

- 5.2 This contention was also made by the Inspector at the 1997 appeal (PI ref T/APP/M170/A/96/270131/P9) in dismissing an appeal against a refusal of planning permission for housing on the site. He said, *'the site forms part of the rural fringe of Rowlands Castle.....the appeal site and the grounds of Deerleap perform an important function in providing the setting for the village and thereby also contribute to the character and appearance of the conservation area.....The site forms an important part of the character of the area, by contributing to the rural setting for the village.....this development would make a significant incursion....and have a suburbanising effect and would not preserve or enhance the character or appearance of the Conservation Area'* (paras 11 & 13) .
- 5.3 Development of this site is shown running close to the scheduled monument of Rowlands Castle. There are no standing remains on the motte and bailey although flints are evident in the undergrowth. Dressed stone has been dumped near the western boundary of the site, but it is not clear where this came from. There is a possibility that more buried remains of former dwellings or routeways may exist close to the monument.
- 5.4 An archaeological desk study was published in 2010 by CgMs acting for Explore Living who were applying for permission to build housing on the site immediately adjacent to the southern boundary of RLC2. Their assessment concluded that there was a *'high potential for the remains associated with a nearby Roman villa and pottery industry. It is also considered to have a moderate to high potential for Mesolithic (12000 – 4000BC) evidence associated with temporary settlement and a moderate potential for late medieval remains associated with the adjacent Rowlands Castle'*. Much of the potential for finds on the Explore Living site had been compromised by quarrying, but this does not appear to have taken place on RLC2. Building new housing here would preclude the opportunity to discover more and also deny the chance of enhancing the appearance and setting of the monument, most of which has been severely neglected.
- 5.5 The NPPF makes clear that a good understanding of important buried archaeology is needed so that any remains and/or the setting of the scheduled monument is preserved and enhanced. This is not mentioned in the proposed EHDC allocation for the site.
- 5.6 Regardless of the potential of finding more buried finds, the appearance and preservation of the scheduled monument would be enhanced by controlling the vegetation and providing an appropriate setting for such important historical features. This is best done by creating and establishing an open area of land around

the monument. Residential development encroaching close to the motte and bailey would destroy this potential and harm the setting of the scheduled monument.

- 5.7 These historic remnants are very important contributors to the character of the Rowlands Castle conservation area by providing evidence of a history of occupation stretching back at least two millennia and probably beyond. The proposal would neither preserve nor enhance this part of the conservation area, indeed it would be significantly harmed.

██████████

4th March 2024

From: [REDACTED]
Sent: 04 March 2024 15:20
To: [EHDC - Local Plan](#)
Cc: [REDACTED]
Subject: Representations on the East Hampshire Regulation 18 Stage 2 Local Plan on behalf of Taylor Wimpey Strategic Land
Attachments: [R002v4 PL - Regulation 18 Stage 2 LP Reps for TWSL - South of Four Marks _ final 04 March 2024.pdf](#)
[A088659 IMP-01 RevC.pdf](#)
[A088659 LCP-01 RevB.pdf](#)

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

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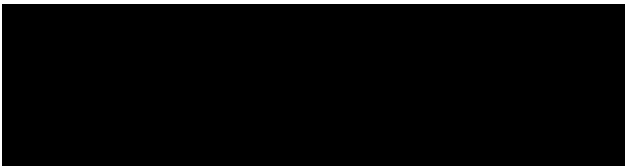
Dear East Hampshire Local Plan team,

Please find attached formal written representations in response to your current Draft Local Plan 2021-2040 consultation (Regulation 18 Stage 2).

These representations are submitted on behalf of Taylor Wimpey Strategic Land. They address the draft Local Plan's approach to its housing requirement which will lead to a shortfall in housing delivery; they raise objection to certain proposed draft housing allocations; and they again promote land to the south of Four Marks, at Alton Lane, as a housing allocation, either on its own or together with adjoining land.

Please kindly confirm receipt of these representations.

Kind regards,



3 West Links | Tollgate | Chandlers Ford | Eastleigh | Hampshire | SO53 3TG



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**Representations regarding
East Hampshire District Council
Draft Local Plan 2021–2040
(Regulation 18 Stage 2) Consultation**

**In support of the allocation of land at
Alton Lane, Four Marks
for residential development.**

On behalf of Taylor Wimpey Strategic Land.

March 2024



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1.0 Introduction.

- 1.1 The following representations are made by Pegasus Group on behalf of our client, Taylor Wimpey Strategic Land (hereafter TWSL). They are made in response to the current consultation by East Hampshire District Council (EHDC) following publication of their Draft Regulation 18 Stage 2 Local Plan. This consultation runs for 6 weeks from 22nd January 2024 – 4th March 2024.
- 1.2 TWSL has a controlling interest in Land at Alton Lane, Four Marks (“the site”). The site has previously been promoted by TWSL as part of a consortium which controlled the larger “Four Marks South” site. These representations are submitted without prejudice to that larger scale development opportunity, which was one of the ten sites considered through the Large Sites Consultation process earlier in the plan preparation process. The Alton Lane site is suitable either for a stand-alone allocation or in combination with / as part of the allocation of a larger strategic site. Representations and previous promotional work undertaken to date by TWSL set out the justification for allocating the site for housing development of about 250 dwellings.
- 1.3 For the reasons set out in these representations, TWSL contends that further site allocations will be needed to meet the Council’s assessed housing need and that there will be a requirement for a range of sites to meet this housing need to enable a balanced approach to housing delivery. Their site at Alton Lane, Four Marks can either be delivered as a single site, or as part of a wider strategic site and should be allocated for residential development to aid the Council in establishing a realistic and robust housing delivery strategy. TWSL is therefore strongly of the view that the site should be allocated in the next iteration of the East Hampshire District Council DRAFT Local Plan 2021–2040.

Agent	Client
██████████ ██████████r Pegasus Group 3 West Links Tollgate Chandlers Ford Hampshire SO53 3TG	Taylor Wimpey Strategic Land, Ground Floor, 730 Waterside Drive, Aztec West, Almondsbury, Bristol, BS32 4UE



2.0 Draft Local Plan Housing Need

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

Standard Method Housing Need

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

'Overall Housing Need: Summary

In line with the standard method for calculating housing need as set out currently



*in the PPG, a minimum local housing need of **632 homes per annum is identified for East Hampshire District.***

This is derived based on household growth of 381 per annum, taking from the 2014-based Household Projections and applying an affordability uplift of 66% applied to this based on the 2021 affordability ratio.

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

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

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

- 2.7 Therefore, the Regulation 18 Stage 2 Local Plan undershoots the objectively assessed housing needs figure in the Council's own evidence base by **53 dwellings a year** (517 minus 464 = 53) in the Local Plan. This amounts to a **shortfall of 1,007 homes** below the minimum requirement during the plan period (53 dwellings pa x 19 years), which is a considerable and unexplained lowering of the Council's objectively assessed housing need against their own evidence base.
- 2.8 Across the entire area (including the SNDPA area within East Hampshire), there is a minimum need of 632 homes a year identified in the HEDNA, but just 578 homes a year being planned for in the Regulation 28 Stage 2 Draft Local Plan. This is a larger shortfall of 54 dwellings a year, or 1,026 dwellings across the plan period.
- 2.9 This is the starting point, but the matter is worsened by the fact that the draft Local Plan also ignores the conclusions of the HEDNA that delivering 115 homes per annum in the National Park area and the remaining 517 homes in the LPA area is an appropriate model to follow.
- 2.10 Instead of this, the current Draft LP plans for a scenario where 100 homes per annum will be provided in the National Park area, and 478 homes per annum in the LPA. There



is no new or additional evidence presented in the draft Local Plan or its evidence base to explain why the Council have departed from the findings of the Assessment prepared by Icen Projects in May 2022.

2.11 The discrepancies between the objectively assessed housing need calculated in the Council's own evidence base (HEDNA) and the draft Local Plan that the Council is now consulting upon are summarised in the following table:

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

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

2.12 In conclusion, the Council is proposing a minimum housing needs figure within their current draft Local Plan which is significantly below the housing need which has been independently identified by their own evidence base. No justification has been provided for this. This renders the emerging plan as potentially unsound.

Local unmet need

2.13 Turning to an allowance for local unmet housing need in the draft LP, paragraph 3.9 explains how a 'pragmatic approach' has been taken in estimating the unmet housing need from the South Down National Park area. The assumption is made that 100 homes per year would typically be delivered within the part of East Hampshire that falls within the National Park, and therefore there would be a residual requirement (potential unmet need) of 15 homes per year to be delivered in the SDNP as identified by the Council's HEDNA (or 285 homes during the plan period).

2.14 As discussed above, the Council's decision to contribute 100 homes per annum to the need within the SDNP is disputed because it is 15 dwellings per annum below the annual unmet need contribution that the HEDNA suggested:

*This analysis has concluded that **delivering 115 homes per annum in the National Park area and the remaining 517 homes per annum in the LPA area** [East*



Hampshire District Council) is an appropriate modelling assumption for the remainder of the report. [Pegasus emphasis added]

2.15 Furthermore, objection is raised regarding how this unmet need figure of 100 dwellings p.a. has been reached. The draft LP suggests that the approach has been based on *'past delivery and historic agreements with the SDNPA.'*

2.16 Past delivery, however, is historic and does not take into account previous under-delivery or future growth in East Hampshire, the South Downs or the South-Hampshire sub-region more widely (as discussed in more detail below). In the absence of evidence to the contrary, the HEDNA's conclusions that the Local Plan should deliver **115 homes per annum in the National Park area and the remaining 517 homes per annum in the LPA area** should be followed.

Partnership for South Hampshire (PFSH)

2.17 Para 3.10 of the draft Local Plan highlights the reported unmet need across the sub-region of South Hampshire (which East Hampshire lies partly within) of approximately 12,000 homes to 2036.

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

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

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

2.20 Whilst the Position Statement is not an upper-tier plan, it does provide informal guidance to inform the preparation and strategic coordination of Local Plan reviews in



the Sub-Region. Given its membership of PfSH, East Hampshire District Council contributed to and approved the findings and conclusions of the Position Statement. Some of its relevant findings and recommendations are set out below.

Part of East Hampshire DC within the sub-region

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

Housing Need in South Hampshire

2.22 The December 2023 Position Statement discusses housing need and supply. The Statement identifies that there is a major need to provide new homes for a growing and aging population and for an increasing number of households. Table 1 of the Statement provides an estimate of all of the PfSH authorities' housing needs, extracted below:

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

Local Authority	Annual Housing Need using Standard Method (dpa)	Total housing need 2023 – 2036	Identified Supply = Commitments, local plan allocations + windfall estimate	Shortfall/ surplus
East Hants (part)	113	1,469	1,275	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	+900 ¹⁰
Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	899	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0 ¹¹
Test Valley (part)	182	2,366	3,109	+743
Winchester (part)	235	3,055	3,055 ¹²	0
Total	6,037	78,481	64,909	-11,771¹³

Table 1 – extracted from PfSH Spatial Position Statement

2.23 As illustrated in Table 1 above, the total 12,000 dwelling shortfall across the sub-region



is clearly very substantial.

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

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

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

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

- 2.25 As set out above, it is submitted that the East Hampshire draft Local Plan will fail to meet the requirements of ‘Stage 1’ of the two-stage approach that PfSH has advocated, by under-delivering against its Standard Method housing target by over 1,000 homes.

Unmet need in the sub-region

- 2.26 Compliance with PfSH’s ‘Stage 1’ is also a national policy requirement as set out in the NPPF at paragraph 67. A Council failing to set out suitable policies to meet its identified housing need across a plan period, without exceptional circumstances, would render a plan unsound. The allocation of sufficient land for housing to meet its established housing need is the minimum that a Local Plan should achieve in contributing to boosting significantly the supply of new homes.

- 2.27 Moreover, ‘Stage 1’ of the PfSH approach to meeting housing needs suggests that the above authorities should be able to ‘meet and potentially exceed’ NPPF 2023 standard method-based housing needs. The East Hampshire draft Local Plan does not do this, and it does not set out any exceptional circumstances to justify why it has not done so.

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

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



and:

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

- 2.29 The Council therefore appears to have taken the position that, because none of the Broad Areas of Search for growth to respond to the unmet needs of the sub-region fall within East Hampshire's Local Authority area, they should make no contribution to the unmet need of its neighbouring South Hampshire authorities.
- 2.30 The Broad Areas of Search for sustainable strategic scale development are set out in SPS8 of the Position Statement. Collectively, they could deliver a combined total of 9,700 homes:
- South-east/east of Eastleigh Town (Eastleigh)
 - Havant Town Centre (Havant)
 - Waterlooville Town Centre (Havant)
 - Southleigh (Havant)
 - East of Romsey (Test Valley)
 - South-west of Chandler's Ford (Test Valley)
 - East of Botley (Winchester)
- 2.31 Three of these seven Broad Areas of Search are in Havant borough, immediately south of East Hampshire. However, two of those three – the Havant and Waterlooville Town Centres areas of search – have considerable constraints. They involve the regeneration of extensive areas of brownfield land and this presents risks in terms of increased development costs, susceptibility to contamination, fragmented ownership and other barriers to delivery. The combined effect of these additional complexities is likely to extend the timeframe for the delivery of these strategic regeneration schemes beyond the plan period.
- 2.32 Moreover, the Broad Areas of Search have the combined potential to deliver around 9,700 dwellings, against a shortfall of 12,000 dwellings, leaving a balance of 2,300 dwellings which is not addressed by the PfSH Spatial Position Statement (assuming that the Broad Areas of Search do indeed lead to site allocations for 9,700 dwellings which are then delivered).
- 2.33 As a result, in addition to the sub-regional strategic scale growth areas, there remains an important role for emerging Local Plans to allocate sufficient land to ensure the delivery of the Standard Method housing requirement as a minimum, and to also contribute to addressing the (at least) **2,300 dwelling gap** in the very substantial



housing delivery shortfall in the South Hampshire sub-region. The draft Regulation 18 Local Plan is deficient in both of these respects.

2.34 Of the PfSH authorities, those least constrained and most able to contribute to addressing the 2,300 dwelling delivery gap are East Hampshire, Fareham, Test Valley and Winchester. If this shortfall is split equally, that places a requirement on each of these four authorities to deliver an **additional 575 dwellings**.

2.35 In East Hampshire, the settlements of Horndean, Clanfield and Catherington lie in South Hampshire. The draft East Hampshire Local Plan allocates land for 513 dwellings in these settlements. Additional land should be allocated for at least 62 more dwellings in those settlements to meet East Hampshire's suggested contribution to the sub-regional unmet need; and **land for 513 dwellings should be allocated in the more sustainable settlements across the district including at Four Marks to account for the fact that the allocations in the South Hampshire settlements of the district were previously intended to meet the needs of the district, not the sub-region.**

Settlement hierarchy and Spatial Distribution of housing

2.36 A Revised Settlement Hierarchy Background Paper (January 2024) forms part of the evidence base of the emerging Local Plan. This describes (at paragraph 7.2) the approach taken to revising the district's settlement hierarchy based on accessibility to existing facilities and services:

"In common with the previous (2022) iteration of the proposed settlement hierarchy, the method of determining a hierarchy prioritises accessibility to services and facilities by walking and cycling modes of transport. This reflects the need to reduce the need to travel by more carbon-intensive forms of transport, in order to tackle the climate emergency. Average accessibility scores for the settlements of the Local Plan Area have been used to form a ranking and establish a hierarchical framework, based on the distribution of these scores for the settlements. Adjustments to the emerging hierarchy have been made (where possible, given the geographical limitations of 2021 Census data for small settlements) in consideration of local population levels. This is to recognise that the resilience of future service provision will be related to the number of potential customers or users."

2.37 The revised settlement hierarchy for the Draft Local Plan 2021–2040 is below, with the number of dwellings allocated per settlement, as follows:



Tier in Hierarchy	Names of Settlements plus housing allocation numbers
1	Alton (incl. Holybourne) – 1,700
2	Horndean – 320; Liphook – 111; Whitehill & Bordon – 667;
3	Bentley – 20; Clanfield – 180; Four Marks & South Medstead – 210 ; Grayshott – 0; Headley – 0; Holt Pound – 19; Rowlands Castle – 145;
4	Arford – 0; Catherington – 13; Headley Down – 0; Kingsley – 0; Lovedean – 30; Medstead – 15; Ropley – 0;
5	Beach, Bentley Station, Bentworth – 10; Bramshott, Griggs Green, Lasham, Lower Froyle, Oakhanger, Passfield Common, Ropley Dean, Shalden, Upper Froyle, Upper Wield

2.38 The main settlement is the market town of Alton. Of the 1,700 dwellings allocated to Alton, at least 1,000 dwellings are proposed under Policy ALT8 Neatham Manor Farm. This allocation, being the largest proposed development in the draft Local Plan, is described as an extension to Alton to create a new neighbourhood with its own character. This development is separated from Alton by the strong physical feature of the A31 corridor and it will be the first development allocation to breach the A31's alignment. The allocation will create a new satellite settlement lying about 2.5km from the centre of Alton and its railway station. This site also lies in an area of landscape and visual sensitivity, close to the outer edge of the South Downs National Park.

2.39 The previous draft Local Plan, which was abandoned by the Council's members, contained a draft allocation for 1,100 dwellings at Chawton Park Farm. This allocation was located on the south-western edge of the town, about 3.0km from the town centre. The Council's members regarded that previous draft allocation as being unsustainable in transport terms, being likely to rely heavily on car transport, and this was a main contributing factor leading to the abandonment of the previous Plan in favour of the drafting of a new Plan which would be "greener" in transport terms.

2.40 Hence, this new draft Local Plan purports to base its development allocations on the relative accessibility of settlements, on the basis of 20 minute walking (1.2km) and cycling distances. However, the new draft allocation at Neatham Manor Farm appears



to conflict with this approach, given its distance from the town centre and its intended provision of just a shop and a pub, with the “potential for a new primary school” and perhaps some employment to also be considered. Indeed, the Council appears to be repeating the mistakes that it made in previously proposing to allocate the unsustainably located Chawton Park Farm in now proposing to allocate the similarly unsustainable Neatham Manor Farm site instead (see SA / IIA below). Policy ALT8 Neatham Manor Farm should be deleted and replaced with more sustainable housing allocations on the edge of Alton and at other Tier 2 and 3 settlements including Four Marks.

2.41 The majority of the remaining balance of 700 dwellings to be delivered at Alton are not allocated in the draft Local Plan, but instead will be allocated through a review of the Alton Neighbourhood Plan.

2.42 Three draft housing allocations are proposed at Four Marks:

- Policy FMS1 – Land west of Lymington Barn – 90 dwellings
- Policy FMS2 – Land rear of 97-103 Blackberry Lane – 20 dwellings
- Policy FMS4 – Land south of Winchester Road – 100 dwelling.

2.43 Objection is raised to the allocation of site FMS4 due to its location on the extreme western edge of the linear settlement of Four Marks. From the centre of this site, the distance to the local centre on Winchester Road at the eastern end of the village is about 1.8km. The site is also about 1.4km walking distance from the primary school, both distances being in excess of the “20 minute” walking distance threshold of 1.2km. This development will consolidate a loose-knit pattern of development in this semi-rural location. Its allocation should be deleted and replaced by Land at Alton Lane, Four Marks, which is more accessibly located and is a more logical location for the expansion of the village (see 3.0 below).

Sustainability Appraisal / Integrated Impact Assessment (SA / IIA)

2.44 The Council produced an Interim Sustainability Appraisal (SA) of its strategic site options in 2021, including the land south of Four Marks. This site ranked in the top five sites for suitability for allocation, in contrast to the current proposed and previous two allocations (Neatham Manor Farm, Chawton Park Farm and Northbrook) which were all identified to have significant negative effects including on landscape. The land south of Four Marks was not identified to have any significant adverse impacts.

2.45 The Council’s most recent Integrated Impact Assessment (IIA) which supports the



current Local Plan consultation states that 217 sites were assessed from which a preferred list of potential allocation sites was drawn up. The land south of Four Marks is not part of this preferred list despite the detailed scoring in the report showing that it performed positively on the majority of criteria.

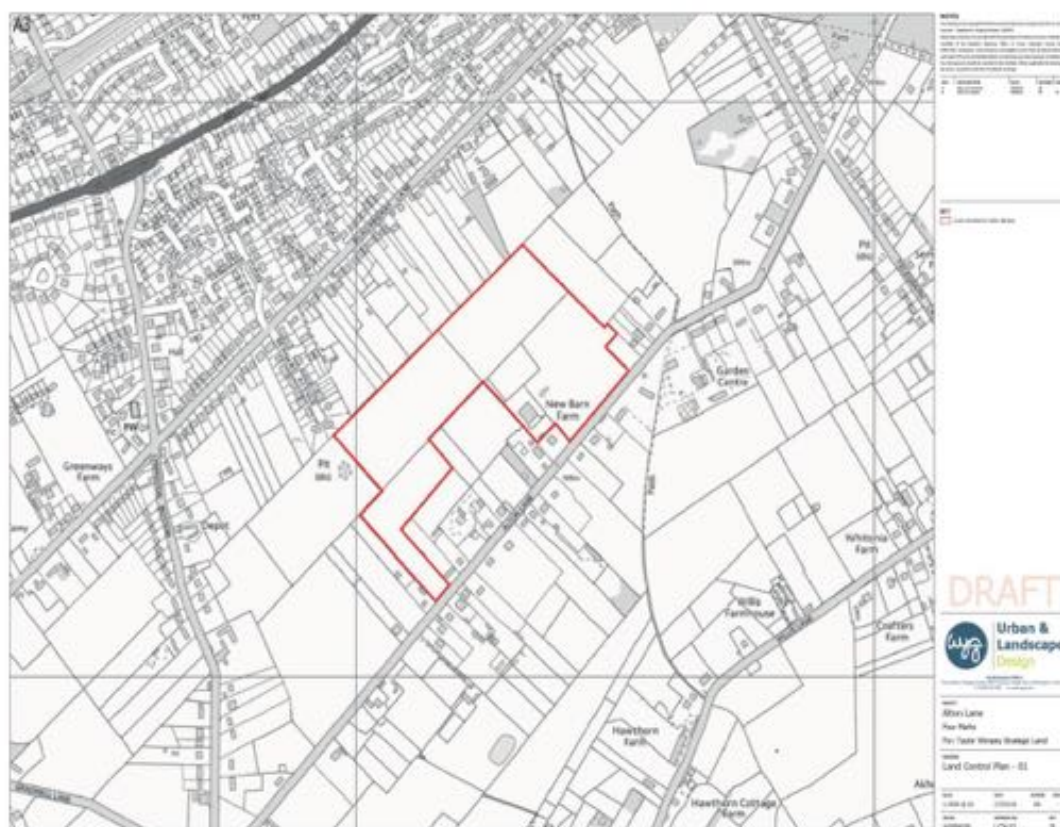
2.46 Furthermore, the assessment identifies that there would be adverse impacts on promoting accessibility and creating well-integrated communities, supporting efficient and sustainable use of natural resources, achieving sustainable water resource management and protecting and improving water quality in the East Hampshire planning area. These conclusions are in direct contrast to the previous SA 2021 findings, which did not identify any significant adverse impacts. TWSL also disagrees with the assessment that the location of the site on the edge of Four Marks raises adverse impacts in terms of accessibility or creating well integrated communities. The site lies close to the village local centre to the north and the primary school to the south west, and the development creates opportunities to provide new and improved links, as well contribute towards a range of services and facilities in Four Marks, particularly if the larger site were allocated. Moreover, the site is not located in a nutrient affected area and therefore will help to improve and protect water quality in the East Hampshire planning area.

2.47 The Council also has a significant amount of evidence from the Larger Development Sites assessment work and the IIA should have included a separate specific assessment of these larger sites so that it is clear how they performed relative to each other. The detailed assessment of all sites in the IIA includes the land at Neatham Manor Farm and it identifies a significant number of adverse impacts of developing this site, but it is still selected as a preferred site. There is no clear justification or rationale for this. The IIA should be reviewed and all larger sites fully critiqued and ranked to inform the selection of allocations. As discussed throughout these representations the land south of Four Marks at Alton Lane has no overriding constraints to delivery and it is suitable, deliverable and a logical location for further growth and should therefore be allocated for development.

3.0 The Site and Delivery Benefits

The Alton Lane site

- 3.1 The site (identified edged red on the plan below) lies within a block of land which is enclosed by existing housing fronting Blackberry Lane to the north-west, Lymington Bottom to the south-west, and Telegraph Lane to the north-east, with a broken frontage of housing to Alton Lane to the south-east. This block of land is therefore in an urban fringe location with existing housing being visible on all sides. Given the existing settlement pattern of the village, the site represents a logical incremental extension to its built form which will not extend development into the open countryside.



Delivery Benefits

- 3.2 The location of the site provides the opportunity to link to both Blackberry Lane and Alton Lane and for the provision of additional community facilities in close proximity to the village primary school a short distance to the south-west. The site lies within the 1.2km 20 minute walking distance of the village local centre and within 300m of the primary school, making walking and cycling realistic transport options for new residents.



-
- 3.3 The Alton Lane site has capacity to deliver about 250 dwellings, to include market housing and affordable housing, making important contributions to addressing local housing needs. The Illustrative Masterplan (which is submitted with these representations) shows how the site can be developed as a stand-alone scheme. Alternatively it can come forward as part of a larger strategic allocation with adjoining land.
- 3.4 TWSL submits that allocating the Alton Lane, Four Marks site will deliver a sustainable and well-located development that will deliver facilities and services to Four Marks alongside meeting housing needs. TWSL contends that further site allocations will be needed to meet the Council's assessed housing need and the unmet needs of adjoining authorities, and that there will be a requirement for a range of sites to meet this housing need to enable a balanced approach to housing delivery. The Alton Lane site at Four Marks can either be delivered as a single site, or as part of a wider strategic site and should be allocated for residential development to aid the Council in establishing a realistic and robust housing delivery strategy.



4.0 Summary and Conclusions

- 4.1 These representations to the EHDC Regulation 18 Stage 2 Local Plan consultation are made on behalf of Taylor Wimpey Strategic Land (TWSL). They should be read in conjunction with the previous representations submitted on their behalf throughout this Local Plan review process since 2017. On behalf of TWSL, objections are raised to the draft Regulation 18 Stage 2 Local Plan for the following reasons:
- 4.2 The draft Local Plan is not planning to meet its minimum housing requirement calculated in accordance with the Standard Method. Instead, the Plan is proposing to deliver a shortfall of over 1,000 dwellings against the Council's minimum requirement. This makes the plan potentially unsound. Additional land should be allocated for at least 1,000 additional dwellings to address this shortfall.
- 4.3 In addition, the draft Local Plan is not making a contribution to the unmet needs of the South Hampshire sub-region where a housing delivery shortfall of at least 2,300 dwellings must be addressed by emerging Local Plans in parts of the sub-region with the ability to contribute. It is suggested that East Hampshire district should propose to allocate land for 575 dwellings as a contribution to addressing this shortfall in the settlements of Horndean, Clanfield and Catherington (proportionate to their tier in the settlement hierarchy). To compensate, land for the 513 dwellings allocated in those settlements to meet district needs should be the subject of new allocations elsewhere in the district in Tier 1, 2 and 3 settlements including Four Marks.
- 4.4 Accordingly, the draft Local Plan should allocate land for a minimum of 1,886 (1,026 + 285 + 575) additional dwellings if it is to meet its minimum housing requirement and fulfil its obligations under the "Duty to Cooperate" in contributing to meeting the unmet needs of adjoining authorities.
- 4.5 The draft Local Plan proposes a relatively unsustainable new satellite settlement to Alton at Neatham Manor Farm, to the east of the A31. This proposed allocation should be deleted in favour of alternative allocations on the edge of Alton together with additional allocations at Tier 2 and 3 settlements including Four Marks.
- 4.6 In relation to Four Marks, objection is raised regarding the proposal to allocate site Policy FMS4 South of Winchester Road as a draft allocation for 100 dwellings, given its relatively inaccessible location on the western periphery of the village. It is submitted that this draft allocation should be deleted and replaced with the allocation of Land at Alton Lane, Four Marks.
- 4.7 Regardless of whether the South of Winchester Road, Four Marks site is deleted, Land at Alton Lane, Four Marks is a sustainably located site, within an area of low landscape sensitivity. There are no overriding technical constraints to development of this site,



as confirmed by the Large Development Site allocations consultation exercise, at which time a range of supporting technical reports was produced and submitted in support of the site's promotion. The future delivery of the site presents the opportunity to deliver significant benefits for existing and new residents in the village in the form of community facilities and accessibility improvements in close proximity to the village primary school and within 1.2km's walk to the local centre via the existing footpath connecting Alton Lane to Winchester Road. The Alton Lane site represents a logical addition to the settlement, it respects and builds upon the established pattern of settlement growth, and it is well contained within the landscape. It can deliver about 250 new homes as a significant contribution to the supply of housing both in East Hampshire district, and to assist in addressing the current shortfall in housing delivery of at least 1,886 dwellings.

- 4.8 We therefore recommend that Land at Alton Lane, Four Marks is allocated for about 250 dwellings in the Council's Regulation 19 Local Plan.



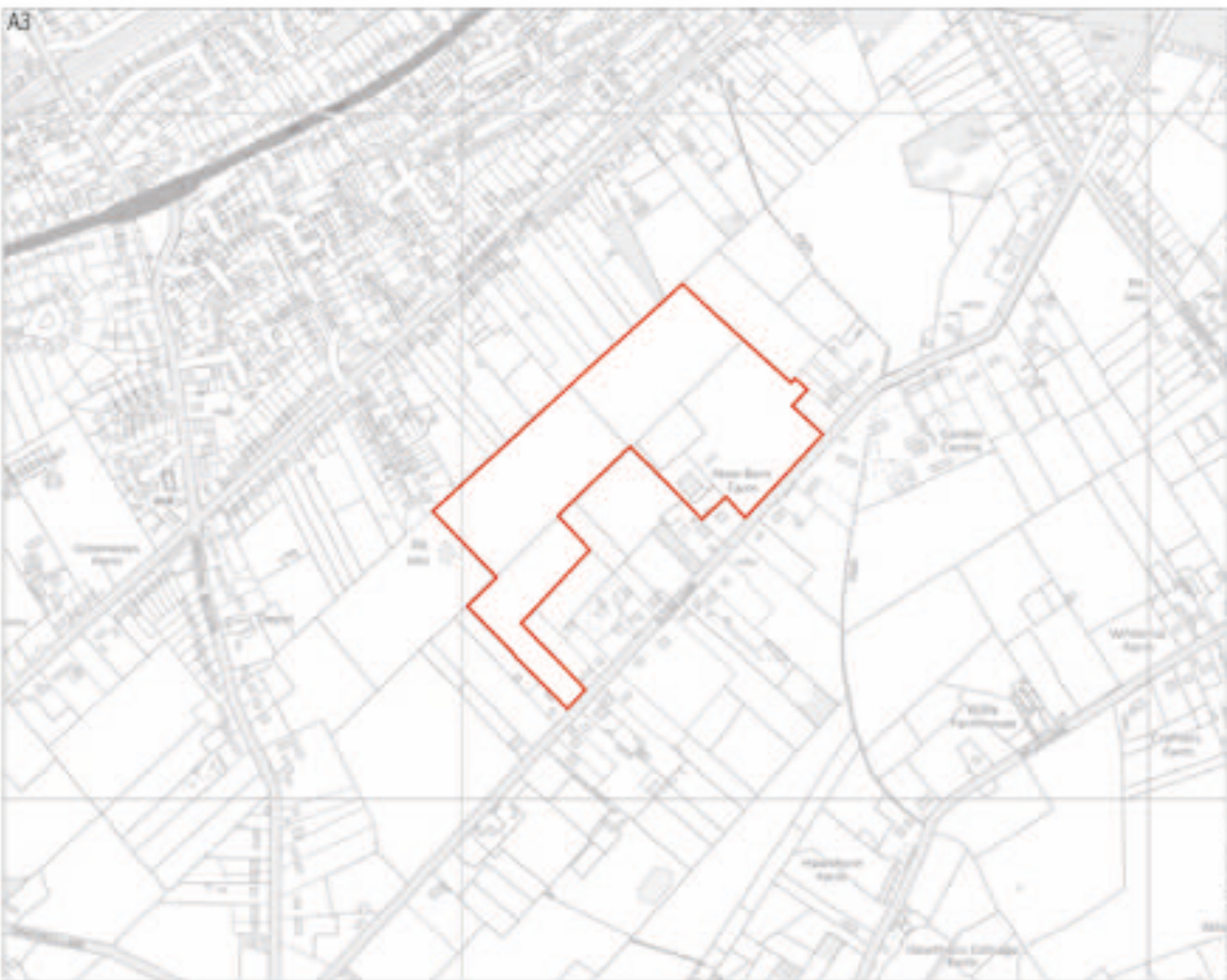
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Projekt:
 Rönns Låda
 Fåröholm
 PIA: Yara Wilson, Simon Lind
 Skapad:
 Elisabeth Henningsen - 01

Item	Value	Unit	Value	Unit
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Volume	100000	m ³	100000	m ³
Weight	100000	t	100000	t



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DRAFT



Site:
 1000 Hawthorn Lane
 The Plaza
 For Sale (Mixed Use) Land

Plan:
 Land Control Plan - 01

NO.	DATE	BY	APP. BY
1	10/10/2023	JM	DM
2	10/10/2023	JM	DM
3	10/10/2023	JM	DM