

Summary of Responses

Draft Local Plan Consultation 2024



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Introduction

The Draft Local Plan consultation 2021-2040 (Regulation 18) took place from 22 January 2024 to 8 March 2024.

The responses received are available to view [online](#). This document summarises the responses received, for the purposes of the Consultation Statement which requires ‘a summary of the main issues raised by representations made pursuant to Regulation 18’.

The document is structured by Chapter, as presented in the Draft Local Plan 2024.

2357 people responded using Commonplace consultation portal, resulting in 8111 contributions. (There were 19,735 visitors to the consultation portal).

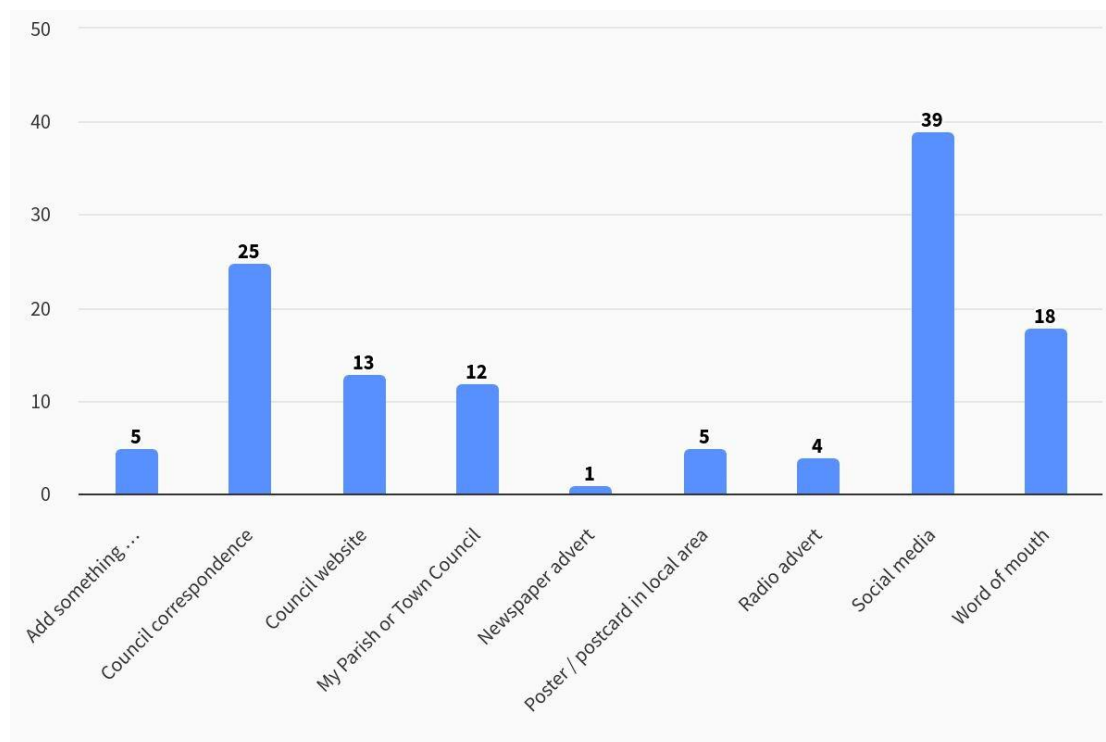
2884 responses were received in total.

Representations received during the Draft Local Plan Consultation 2024

<u>Type of response</u>	<u>No of responses</u>
Commonplace consultation portal	2357
Statutory consultees	23
East Hampshire Parish and Town Councils	18
Organisations and interest groups	37
Individuals	358
Industry Professionals	91
Petition relating to site ALT8	1 (with >1000 signatures)

Consultation Events

Question: How did you hear about this consultation?



Question: Any other comments about this consultation?

Positive comments

Some positive comments saying the events were well run, and informative.

A comment stating that the individual was very impressed at the scale of effort and professionalism that has gone in to produce the Plan and the preparedness of the officials to answer visitors' questions.

Not sufficient publicity

Some people were concerned that they hadn't heard about the consultation and there wasn't sufficient publicity. Some suggestions that all homes should be notified. Some comments that by the time they had heard about the consultation events, the date nearest to them had passed.

Events

Some comments that the number of consultation events was not sufficient, and there should have been another one in Alton, and one in Clanfield and Rowlands Castle.

Comment that the documentation at the event was too long and jargon filled, and hard to interact with. Query whether it was accessible to all, and if an Equalities Impact Assessment had been carried out. Suggesting that comments should be able to be submitted at the events.

Suggestion of a short talk at each of the events as there was a lot of information to take in, and this would have made it more accessible for a range of people.

One representation received suggests that there should be more 'live' events with two in each area and one of them on a weekday evening.

Pleased there was an event in Four Marks.

Disappointed that the banner about the climate emergency didn't mention anything about trying to reduce CO2 emissions from transport which contributes 43% of the total.

Disappointed that there was no record of attendance taken and no mechanism to log opinion.

Too much information

Comments that the amount of information presented in the consultation was overwhelming, and took much to take in in a short amount of time.

Problems completing online form

Problems using the online consultation portal were documented, exclaiming it is hard to use and not user friendly.

Not a consultation

Comments that the consultation was not really a consultation, and was simply a presentation of a completed document, with concerns that comments made won't make any difference. Some comments about the cost of consultation.

Inclusive consultation / statutory consultees

There is no evidence of agreement from Hampshire County Council in terms of the infrastructure provision needed to support the proposed amount of housing.

The Neatham Down project which identifies housing for the Traveller Community does not detail any robust consultation with the Traveller and the outcomes of any discussion with them that may have taken place- do they want to remain in one place, why are they allocated a 'segregated' area just for their community- this is not inclusion and gives rise to a 'ghettoing' for a certain demographic.

General objection to more housing / comments on housing

Some comments made in this section generally objecting to more homes in East Hampshire. Concern about loss of greenspace.

Development should be focussed on the centre of Alton and not 'out of town'.

Social Housing which is not 'affordable to buy' but available for families which require accommodation for rental (like the Council House programme) is not evidence and any 'affordable housing is only ever that for the first buyer after which any sales are set at the local market rates which are unaffordable as can be seen by the empty property in towns and cities across the country.

Infrastructure comments

Some comments made in this section about lack of infrastructure. The plan doesn't identify the infrastructure needed to support growth.

The existing village of Holybourne and Neatham have drainage issues and regular flooding because of the natural underground springs and rivers, The proposed planning for houses does not take account of this and how this will affect the existing houses in these areas, particularly those which are listed buildings. The Developer has thought of the impact of the development but not provided research and consideration to its planning on the impact to the existing houses and road systems within this catchment.

Tier comments

Some comments made in this section about the settlement hierarchy and objection to the Tier for Alton.

Settlement Policy Boundary comments

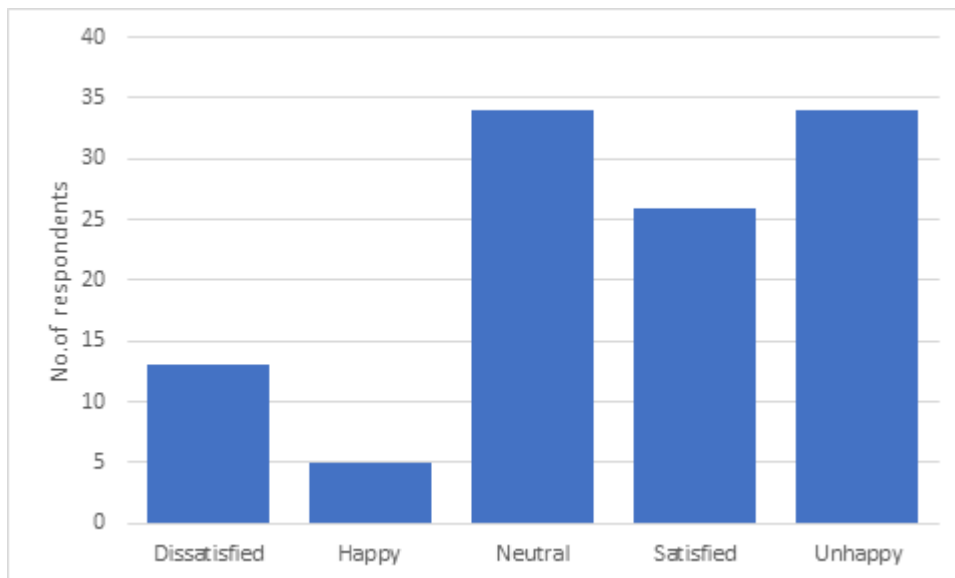
At the moment the redline around Lasham includes the Royal Oak public house. This means development of the car park would be easier. The pub should be excluded to make it harder for the pub to become dense housing

Lasham Settlement Boundary

With the Royal Oak public house in Lasham now shut for business, the Settlement boundary around Lasham should be extended to include the public house car park.

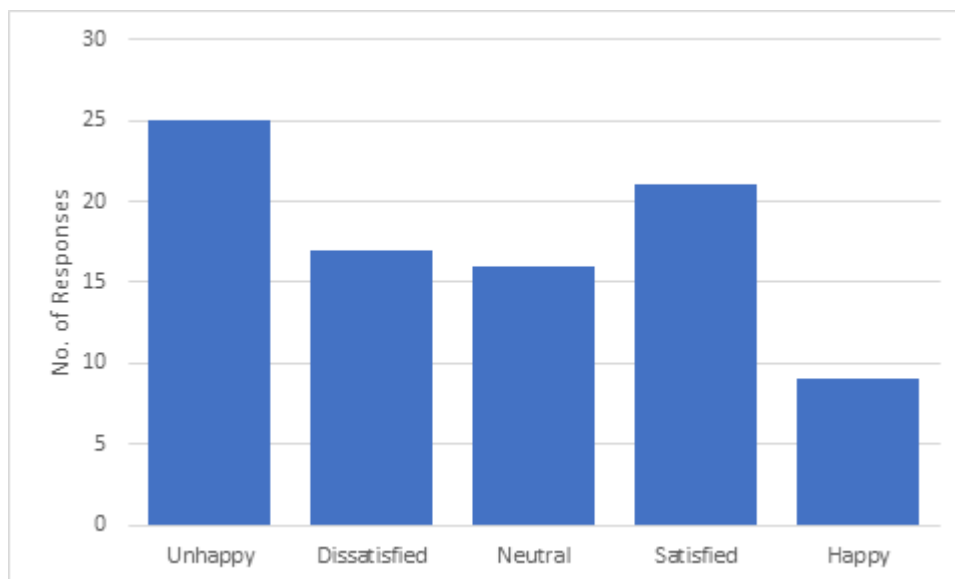
Chapter 1 Introduction and Background

Question: Chapter 1 Introduction and Background – How do you feel about this chapter?



Chapter 2 Vision and Objectives

Question: How do you feel about the Vision?



Question: What are your comments on the Vision?

Some supportive comments, saying the vision is well explained and covers key points. The vision uses positive words, and expressions of agreement. In terms of specifics, welcome seeing policies on climate change, and comment that affordability of housing is essential, along with integration of greenspaces and biodiversity with the community. Support the statement under B1 of Visions and Objectives that the integrity of existing settlements and their settings should be maintained.

However, concerns were raised predominantly about how realistic and deliverable the proposed vision is. The wording is very aspirational saying what everyone would hope, but it isn't realistic, and there are no plans to deliver it. The vision and objectives are too light on how they will be achieved, in fact, achievement is beyond the control of the council as other organisations are involved such as HCC. Developers don't conform to the vision and it is difficult to make them do so.

The vision is unrealistic for areas of the district. It cannot be achieved in Whitehill & Bordon due to poor public transport. Everything that is promised doesn't happen, and it has no basis to the reality we live in. The reality is too much housing in EHDC outside SDNP, and dormitory towns and developments. People cannot rely on public transport as there isn't regular public transport options available. Need to recognise that East Hampshire is a rural area and should remain so. Many residents are retired or work outside of the area – so we do not need to prioritise economic development. We should focus on enhancing what we have, rather than trying to change it.

We need an ambitious vision for making better what we have. We also need a vision for the biodiversity crisis. There is no demand or need for new homes in Alton.

The vision is at odds with what is proposed in the Draft Local plan, the plan doesn't support the vision or objectives, or deliver them. This is a common comment throughout the responses. The proposal to develop Neatham doesn't conform with the proposed vision. It is a contradiction to state that our community will have green and welcoming spaces and then

to suggest building on the open green spaces around Alton. Alton is actually seeing decline.

Some comments wish to see greater focus on local areas in the vision, stating that there is no vision for Alton, for which the future looks poor at the moment, and that more needs to be said about Whitehill & Bordon as key aspects of that development are unknown.

In terms of the timescales, comments that 2040 is a long time to wait to deliver a vision, and that there should be intermediary milestones by which these goals will be achieved, 2030 at the maximum, and they should be maintained thereafter.

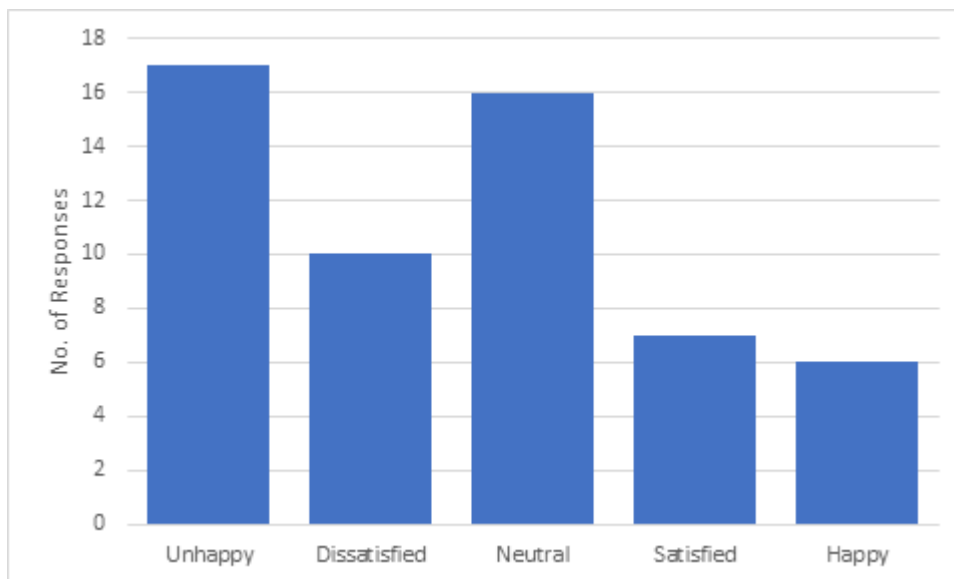
The vision isn't measurable and there is no way to hold the Council to account.

A suggestion that the vision should focus on what services and facilities are needed to support communities and improving quality of life. The vision needs more emphasis on what local people want. A mix of suggestions as to what that actually is – one comment saying; "We need to make East Hampshire a nice play to start and bring up a family. If we carry on as we are it will be an old peoples home. It is time for change." Others focusing on landscape, traffic management, infrastructure and housing provision.

Quite a few comments about references to climate change. If accessibility and sustainability are the keys to responding positively to the "climate emergency", then they are the criteria on which all parts of Local Plan need to be assessed. However some question the emphasis on climate change, saying it is overemphasised, and can in reality be addressed by taking sustainable actions. Also, that the Council is constraining economic, social and domestic activity in the district to reduce carbon emissions in an attempt to justify their declaration of a climate emergency, which is misguided as it is not going to make any impact upon climate change. Along with comment that 43% of emissions in the district come from transport. They do not state what proportion we are responsible for, i.e. not produced by vehicles through and aircraft travelling over the district - for example on the A3 or A31, and over from Farnborough Airport. It is not clear in the vision or elsewhere, whether making current housing stock, whether social or privately owned, more carbon neutral is part of this plan. Obviously current housing stock makes a significant contribution to carbon emissions. Improving insulation and retrofitting alternatives to gas boilers, for example could make a significant reduction in carbon emissions in the locality.

Petersfield Climate Action Network (PeCAN) suggests adding the words "and the nature emergency" to the vision as follows; respond positively to the climate emergency and the nature emergency.

Question: How do you feel about these Objectives?



Question: What are your comments on the Objectives?

A small number of supportive comments were received, noting that the objectives are well defined and explained.

However, most comments raise concerns, as with the vision, particularly that they are not deliverable or grounded in reality. The plan is too heavy on visions, objectives and policies then too light on how they will be achieved. Many are beyond the Council's control and depend on organisations such as health education and county council who have not been involved in the plan. All the niceties will be undermined by the reality of government directives, underfunding and developers. Cannot be achieved to get people to reduce reliance on their cars when proposing new housing in villages with limited facilities. The process doesn't allow for these objectives to be delivered. The reality is that the continuing of building in Alton is ruining the town as a place to live. It does not prioritise the health and well being of the people of Alton and has not delivered what is needed to support this level of new development.

As with the vision, comments that the objectives are at odds with the Draft Local Plan, particularly referring to the proposed development of Neatham Down, which it is stated is at odds with B1, B2, B3 and B4. In addition, with regards to healthy lives, there is no hospital planned for Alton, or additional doctors, dentists.

Also queries about how the objectives are measured and enforced. For example, with regards to B4 reducing car usage, how is this going to be achieved and measured? The objectives are not specific enough. How does the council measure success in meeting these objectives? They need to be SMART.

Comments that the objectives appear blurred, and too vague with little specific objectives.

Many comments focus on infrastructure provision. Infrastructure should be built before/ at the same time as housing, not after (possible idea is for EHDC and Hampshire County Council to support infrastructure upfront, to be reimbursed by future S106 funding). Some comments in relation to Whitehill & Bordon stating that infrastructure has not been delivered or is threatened with closure. Alton is already overdeveloped and the infrastructure is not there to support it. The sports centre is too small, and doctors and dentists full.

With regards to Objective A “Providing sustainable levels of growth through the Local Plan”, specific comments;

- It is a population crisis and not a housing crisis. Building more homes isn't fixing the problem, it is adding to it. Also, instead of buying new land for employment opportunities, focus attention on existing land, for instance, the dying high street and surrounding businesses.
- 'Sustainable' & 'affordable' are over-used adjectives. It would be great to maintain a supply of land in the right location for housing, but in reality, it's going to be further away from town centres and their facilities. It's never going to be in the 'right' location as this is subjective and will be opposed.
- Objective A3 comes before objective A1. The model of building more houses to attract more city dwellers with money has failed. It is essential that we have a vision for East Hampshire as a place to live and work and bring up a family. The over 70's will not be here in 2040. We need to review the business community and find out why our residents do not engage with local businesses and create job opportunities for local employment.

With regards to Objective B “Providing better quality, greener development in the right locations”, specific comments;

- This contradicts what the plan is really about which is building more homes. Destruction of green fields will continue.
- B4 - There are many aspirational statements about walking and cycling, public transport, and reducing reliance on private cars. However as noted in the plan the area is substantially rural, and residents depend on ability to access facilities remote from where they live. Required destinations are outside reasonable walking/cycling distance, and there is no plan for realistic public transport at a decent frequency.
- Either the plan needs to detail how quality frequent public transport will be provided, or it should accept continued dependence on the car, and cater for this rather than trying to say everyone will walk.
- B3: To be welcomed. Currently there are no signs that we are building homes for the future. On the current trajectory we are light years away from meeting our net zero targets, and will continue to be whilst we allow developers to build badly designed houses, with poor quality insulation, and archaic energy systems.
- B - 'Green' is another over-used and meaningless term. Again, the objective is admirable but cannot realistically be delivered. For instance, how will a 10% increase in biodiversity be measured & how long after the development's build will it be assessed?
- B4 is social engineering, net zero is a flawed objective.

With regards to Objective C “Prioritising the health and well-being of communities in delivering what's needed to support new development.” specific comments;

- Fail to see how these objectives will be effectively implemented to increase the wellbeing of local people.
- C1, C2, C4 : There is minimal discussion of how EHDC plans to provide the infrastructure to support further development and how it will improve public transport.

- C3 Very much to be welcomed. We must treasure our green spaces in and around the town.
- C - Elsewhere it says you can't deliver new dentists, for instance, so unsure how support for communities such as this can be an objective.
- C2 objective clearly says that we need to ensure infrastructure needs to be improved to bring it up to the standards required to reduce the impact of climate change over the plan years. All public buildings need to be quickly converted to green energy and insulation improved.

Specific more detailed comments on the Vision and Objectives

Hampshire County Council

The County Council, as the authority with public health responsibilities, welcome putting healthy, accessible and inclusive communities front-and-centre in the Plan's vision. There are many cross-cutting themes that align with Hampshire's Public Health Strategy 2023-2026

Suggestion: strengthen the link between health, wellbeing and climate change by reference to the Public Health Strategy. Reference to Chapter 8 of the NPPF within National Planning Policies section (1.5 page 14) would also reinforce this key thread within the plan.

Encourage clear reference to East Hampshire Welfare and Wellbeing Strategy (refresh due Sept 2024) to demonstrate how, across the organisation, health is a thread woven throughout all decisions and policies.

The objectives could helpfully cross reference to other objectives in sections A and B around sustainable growth and quality/greener development. The broader consideration of wider determinates as set out within the Integrated Impact Assessment would allow the delivery to widen these healthy place objectives. The County Council can provide further advice on prioritising the health and wellbeing of communities in delivering what's needed to support new development.

Historic England

The vision does not meaningfully connect with the District's historic environment. This sets an initially unhelpful steer for the plan when seeking to deliver a positive strategy for the historic environment. Ideally the vision would connect explicitly to the district's heritage, but there are also more nuanced ways of introducing such a concept, such as shown in the adjacent proposed wording.

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

B1 – Object. Paragraph 8c of the NPPF describes the environmental objective of sustainable development in terms of protecting and enhancing "our natural, built and historic environment". We are concerned by the implication that "built" is synonymous with "historic".

These two words have different meanings and objective B1 should ensure that both words are used. On a connected matter, without reference to the historic environment, there is also the risk that the objective fails to connect appropriately with the district's archaeological remains

Suggested wording - “Make sure that new developments are located to maintain and improve the quality of built, historic and natural environments, including our high-quality and valued built heritage and landscapes, whilst maintaining the integrity of existing settlements and their settings.”

C1 – object. It is unclear if this objective aims to connect with the historic environment or not. This needs to be made explicit. We query the similarity of the opening of this paragraph to B1 and wonder if the text in C1 might be abridged as shown. We suggest also referring to the wider historic landscape.

Suggested wording - “Maintain and enhance the built and natural environments to sSupport habitats and their connectivity, help the public to access and enjoy open spaces, and green infrastructure and the wider historic landscape.”

National Highways

We welcome the Council’s vision to provide sustainable development with a focus on reducing carbon emissions whilst promoting active travel and public transport use to limit car journeys and congestion locally, and on the wider network. The updated DfT Circular 01/2022 reflects this and notes that new development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable.

Natural England

Natural England welcome the fact that the climate emergency will be a key concern and focus for new Local Plan and that development coming forward will need to be net zero carbon and sustainable. We advise that the climate emergency sits at the heart of the new Local Plan, with clear recognition as the key issue and priority to positively respond to. The Plan should have a clear aim to significantly and demonstrably improve the natural environment to ensure housing and infrastructure needs are met sustainably.

Natural England advises that the Plan’s vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity.

The Plan is underpinned by the core Objectives A1-3, B1-5 and C1-4. We advise that more clarity could be made through Objectives B1-5 and C3 in securing measurable net gains for biodiversity, while closely linking to the Biodiversity Action Plan, Local Nature Partnership, South Downs National Park Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies and the Nature Recovery Network, for how this can positively achieve gains in biodiversity alongside improving overall environmental connectivity. Natural England advise that greater emphasis through the Plan Vision and Objectives should be made to facilitating wider ecological connectivity through the Local Nature Recovery Strategy (LNRS). Consideration should be given to how this can improve the Plan’s visibility of its ecological network through enhanced mapping.

Natural England recommend the local plan Vision sets out policy that links public health and wellbeing to the natural environment and seeks to enhance green infrastructure and ecological connectivity across the district that is managed for people and nature. Please see relevant advice in this letter relating to green infrastructure, protection of natural assets and achieving biodiversity net gain to help maximise the benefits outlined in this section.

South Downs National Park Authority (SDNPA)

Objective B1, p27 - The objective is supported. We suggest specific reference is made to the South Downs National Park (SDNP) in recognition of: its landscape and scenic beauty; its special qualities; its setting; and its importance as a resource for residents to access and enjoy. The latter connects with health and wellbeing objectives. Reason - National Park Purpose Nos 1 & 2; and NPPF Paragraph 182.

Objective C3, p28 Please amend to: Maintain and enhance the built and natural environments to support habitats and their connectivity across the district and its boundaries, and help the public to access open spaces and the South Downs National Park. Reason - National Park Purpose No.2.

Integrated Care Board (ICB)

Objective C - This is a very positive message that highlights that the LPA fully supports the need for health infrastructure and has made this clear in the inclusion of these objectives. Furthermore, it highlights the issue of timely infrastructure and capacity. These objectives will add more weight to future ICB requests and will be included in the submission templates.

Four Marks and Medstead Neighbourhood Planning Steering Group (NPSG)

The NPSG supports the ambition expressed in the Vision and the Objectives. The NPSG particularly welcomes the phrase 'quality affordable homes' that is included in the Vision. The NPSG suggests that this point is also made explicitly in the Objectives.

Objective A – providing sustainable levels of growth through the Local Plan The NPSG is in broad agreement with the objectives outlined in the above. However, the NPSG would suggest a small amendment to the wording in A3: "Ensure our defined town and village centres provide a range of retail and associated activities to maintain and improve their vitality and viability in keeping with their local character."

Headley Parish Council

Support Objectives A1, A2, A3.

Support Objectives B1, B2, B3, B5 – but cannot see that residents in East Hampshire can "reduce their reliance on the private car" as public transport between villages and towns is sparse or non-existent, as required by Objective B4. It is insufficient for EHDC simply to be silent on or refer obliquely to the fact that public transport is the responsibility of others (e.g. South Western Railway or Hampshire County Council), as in DGC2, while presenting policies that depend crucially on the services that these parties provide for their success. It is also important in this context to note that EHDC doesn't seem to be aware of the perilous state of public transport across its area as its settlement hierarchy calculations are based on long outdated bus service frequencies.

Support Objectives C1, C2, C3 and C4.

Horndean Parish Council

- Objective A3 mentions "defined town and village centres" but in fact Horndean and Clanfield, for example, are not that well defined.
- Objective B3 aims to reduce the reliance on the private car. As the purpose of the consultation is to collect evidence, would it be possible to carry out a high level stocktake to show the location of schools and surgeries in each settlement (and maybe add in the supermarkets) as these drive many of the behaviours that the Plan

is hoping to address and might help to give a more realistic view of the viability of walking or cycling to them when smaller developments come forward.

- There is a lot more awareness around walking and cycling but it is not that pleasant to carry a small bag of shopping over half a mile (and more) especially for mothers with children and the elderly.
- It is unlikely that people will stop using their cars but perhaps it should be mentioned that more people will be buying electric cars/hybrid cars so the car itself may not be responsible for pollution as much as it is now.
- Where infrastructure constraints are identified, developers are required to set out what appropriate improvements are necessary. But how do they do they ensure these will be delivered when the parties involved could be HCC with their own priorities, timescales, and budgets?

Rowlands Castle Parish Council

The Vision. Happy with the Vision but 'accessibility' and 'quality affordable homes' will be challenging to achieve and maintaining a supply of suitable land for development cannot be sustained for ever.

Selborne Parish Council

Selborne Parish Council carried out a public consultation exercise in 2023 as part of the work to prepare a Parish Priority Statement for the SDNPA Local Plan Review. This work is also relevant to the EHDC Local Plan review.

The consultation identified three key priorities for the Parish are related to landscape, traffic management, and infrastructure and housing provision.

Protection of the landscape

Maintaining, protecting and enhancing the unique character of the countryside, footpaths and verges featured highly, with achieving greater biodiversity also included. Ideas included planting more trees and wildflower verges. Many respondents mentioned keeping the character of the villages and their environment in line with the Selborne Village Design Statement (VDS) and the Selborne Local Landscape Character Assessment (LLCA).

Reducing the negative impact of traffic on the quality of life and village infrastructure

Traffic through the Parish is by far the most pressing and relentless issue as detailed in the responses from residents who asked for less traffic, lower volumes and so reducing pollution in its many forms. Additionally enforcement of the speed and weight limits across the Parish is seen as a major priority. Ideas put forward ranged from traffic calming measures such as that in Greatham village, speed cameras, a bypass to be built and the Ham Barn roundabout to be changed to divert traffic away from the Parish. People stated not feeling safe walking along the narrow pavements where they exist. Wider and additional pavements were requested to enable all ages and abilities to have safer walking route options.

Improving a number of key aspects of infrastructure and housing provision.

These ranged from the need for local shops/ post offices selling affordable essentials, provision of a pub/hotel with accommodation for tourists and visitors, the need to develop regular and reliable public transport, cycle paths, the provision of free car parking, and the installation of electric charging points for cars and other vehicles. The need to improve communication via the installation of fibre broadband to all homes and local businesses and a desire for improvements in mobile phone reception featured for all villages. It was noted

<p>that home working and local businesses all require 296 good quality communications to enable them to thrive and maintain local employment opportunities.</p> <p>The need for affordable and social housing was noted, downsizing properties for older residents was also raised so they could stay locally and thus free up their houses for new families wanting to buy in the Parish. Housing should be sustainable, eco-friendly and in line with the Selborne VDS.</p>
<p>Whitehill Town Council & Whitehill & Bordon Community Party</p> <p>Satisfied with the overall vision such as the number of houses for the Alton area but dissatisfied that the vision is unrealistic for Whitehill and Bordon at present due to the poor public transport links in Whitehill and Bordon. Until the transport system in Whitehill and Bordon is upgraded the vision in the local plan for Whitehill and Bordon is unachievable.</p> <p>Chapter 2 Objectives - Ideally infrastructure needs to be built at the same time as the housing, not after. An example would be EHDC and Hampshire County Council supporting infrastructure upfront, to be reimbursed by future S106 funding.</p>
<p>Alton Climate Action Network (Acan)</p> <p>In a number of places in the Plan e.g. Vision, there is reference to the “climate crisis”. Except where there is a specific climate-only issue, it is important to refer instead to the “climate and biodiversity crises”.</p> <p>In many instances the Objectives and Policies are quite vague. Wherever possible terms should be defined and targets set that are specific, time-bound and quantifiable. It should also be clear who will monitor performance, who is accountable and who will provide the necessary management resources for the long-term.</p>
<p>Campaign to Protect Rural England (CRPE)</p> <p>The current Local Plan recognises and protects the high quality landscape and natural environment of the local plan area, as does this consultation plan within Safeguarding the Natural Environment. This vital objective should be made clear in the 2040 Vision and in our view the reference to "green and welcoming places to live, work and play" does not achieve this. Nor is there any reference to the need for development to be sustainably located.</p> <p>In response to the 18(1) consultation, we suggested the addition of the words underlined "..... with green and welcoming places to live, work and play and respond positively to the climate emergency <u>within an environment in which natural beauty and wildlife is protected and new development is sustainably located</u>".</p> <p>We maintain that view, but do recognise that the Vision is now amplified by the Objectives, including Objective B1 relating to the built and natural environment which we agree.</p> <p>As regards housing matters we support the ambition expressed in the Vision and the Objectives. We particularly welcome the phrase ‘quality affordable homes’ that is included in the Vision. We suggest that this point is also made explicitly in the Objectives.</p>
<p>Petersfield Climate Action Network (PeCAN)</p> <p>Vision statement: we suggest adding the nature emergency to the vision as follows “...respond positively to the climate emergency <u>and the nature emergency.</u>”</p> <p>Objectives B1 to B6: we support these objectives. To bring the draft Local Plan into line with best practice, we suggest adding a reference in these objectives to the Council's area-wide net zero and nature targets in its updated Climate and Environment Strategy. For examples</p>

of how this has been done in other adopted Local Plans, see https://councilclimatescorecards.uk/question/s3_p_lu_q1/?type=district#performance

Berkeley Homes support the draft Plan's vision and overall approach to meeting the District's housing needs in full

Cala fully support the Vision of the Council for the District, looking ahead to 2040.

Boyer on behalf of Cala Homes Land north of Fullers Road, Holt Pound (LAA site BIN005, draft Local Plan site HOP1)

We are supportive of EHDC's overarching vision. In particular, we endorse the need to respond to the climate emergency and promote the delivery of quality affordable homes, facilities, and employment opportunities in sustainable locations.

However, the Vision needs to place greater emphasis on the requirement to fully meet the local authority area's housing need. Whilst the vision acknowledges that there is a need to provide "quality homes", it does not explicitly recognise the pressing need for new homes. The local authority area does not contain any principal constraints i.e. Green Belt, National Landscapes etc. which would indicate that the housing requirement should not be met in full.

The Vision should therefore be revised to maximise the delivery of housing to meet the needs of the current and future population. The foreword on page 1 of the Draft Plan highlights EHDC's aim of providing a "front door for everyone". We consider that this wording, or an appropriate equivalent should be included within the Vision.

We are generally supportive of the Draft Plan's objectives (Objectives A, B and C); however, we suggest that additional consideration is given to parts A and B.

Objective A – Providing Sustainable Levels of Growth through the Local Plan

We support EHDC's objective of providing sustainable levels of growth, in particular through Objective A.1 which seeks to provide a sustainable level of housing growth to meet future housing needs. We would, however, suggest that this key objective is amended to reflect paragraph 60 of the National Planning Policy Framework (NPPF) 2023 which states that "the overall aim should be to meet as much of an areas identified housing need as possible...".

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

We are supportive of the local authority's aim of tackling the climate emergency and promoting greener development. However, consideration should be given to Objective B.3 and its aim of ensuring that new development prioritises the achievement of net-zero carbon emissions. The objective should reflect the need to adopt a phased or transitional approach to becoming fully net-zero. A transitional approach would also reflect the fact that most residential developments can only become fully net zero, when the wider power-generation network is free from carbon-based power stations.

Furthermore, the Government has recently confirmed that Local Plans are not expected to include policies that go beyond standards expressed in Building Regulations. This is unless such policies are robustly justified and costed. Cala are concerned that the Draft Plan (at this stage) has not adequately addressed the costs and ramifications of the proposed Climate Change/net zero policies.

With respect to the proposed vision and objectives, we endorse the need to positively respond to the climate emergency and promoting the delivery of quality affordable homes, facilities, and employment opportunities in sustainable locations. However, we recommend that the vision and supporting objectives go further to encourage the delivery of housing in accordance with the aims of the NPPF, which advises that the overall aim should be to meet as much of an area's identified need as possible.

Boyer obo Wates Developments regarding land north of Gilbert White Way, Alton (LAA site AL059)

Wates supports the overall vision.

Re A and A2, Wates agrees and supports the provision of housing in sustainable locations. However, it is vital that this aspiration is adequately secured by the policies proposed in the Local Plan, including the suite of allocations identified. As detailed in this representation, Wates does not agree that the Draft Plan achieves this in its present form

Objective B

Wates agrees that new developments must be sustainably located and improve the quality of built and green environment. This includes working towards net zero carbon emissions.

However, the Government has recently confirmed that Local Plans are not expected to include policies that go beyond standards expressed in Building Regulations. This is unless such policies are robustly justified and costed. Wates is concerned that the Draft Local Plan (at this stage) has not adequately assessed the costs and ramifications of the proposed Climate Change / net zero carbon policies. This matter is assessed within Section 4 of this representation.

Objective C

Wates supports the principle of Objective C, ensuring that suitable infrastructure is available to support public access and opportunities and address future needs. However, this highlights the importance of allocating sites that are both sustainable and deliverable in order that infrastructure (and policy-compliant levels of affordable housing) are brought forward as the Plan intends.

Wates believes the proposed vision and the three related objectives to be aspirational and supports them in principle. However, some aspects of the objectives are not then appropriately addressed through proposed Local Plan policies, particularly those relating to the Housing Requirement and selection of sites for allocation. Conversely, some aspects of the vision and objectives, notably those linked to net zero carbon development, are then reflected in proposed policies that may be undeliverable and are not adequately justified and tested.

Cater Jonas

The vision should explicitly recognise the need to meet locally assessed housing need. It should place a more substantial emphasis on the need to deliver affordable housing across the districts and to improve affordability of housing in the rural areas, particularly where there has been a locally identified need and a historic under-delivery of new homes.

The objectives proposed in the Local Plan appear to be appropriate.

The objectives to provide a sustainable level of housing and employment growth are supported, but what constitutes a sustainable level of growth is questioned. There is capacity and opportunity to deliver more homes, in a sustainable fashion in the District, including at Medstead and Four Marks.

The objectives aimed at carbon management, climate change resilience, and nature recovery are laudable, and supported. However, it is suggested – as with the policies later in these submissions – that the evidence which underpins them needs to be more robust, and that legislation, and or regulation may overtake the way that these matters are dealt with through the planning and development process.

The objectives which seek to support new infrastructure and technology are supported, and it is suggested that new development can help deliver the new infrastructure which is so desired.

Falcon

Falcon supports EHDC overall Vision and Objectives of the Draft Plan, alongside the strategic objectives to create communities through sustainable development in suitable locations, delivering Homes for All.

The Vision states that it is ambitious however this does not go far enough to meet the full need of the district whereby housing delivery figures have been restricted when there are no significant constraints to development.

Highwood

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

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

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

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

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

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

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

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

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

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

Harrow Estates

Overall, HE is supportive of the vision in the Local Plan in terms of recognising the key issues facing the District and its prioritisation of inclusive communities, sustainable location and carbon neutrality, while striving for homes for all, including affordable housing.

The requirement to deliver accessible new homes and inclusive communities was evidenced within paragraph one on page three of the Local Plan Issues and Priorities (Part 1) R18 consultation (January 2023) which stated “the best quality homes to be built in the best places, to meet all the needs of our residents in the most sustainable way possible. We want our new Local Plan to be as proactive as possible in meeting the challenges of the climate emergency and to ensure any development is as sustainable as possible” [our emphasis added].

HE highlights concern that the above terminology, which seeks to meet all the needs of residents in the most sustainable way possible, has not been carried over to the Part 2 R18 draft local plan and notes it is fundamental to seek to achieve this ambition in order to deliver the Council’s vision. As such, it is implicit that the Plan seeks to identify an optimised spatial strategy that not only delivers homes in sustainable locations, but which would also satisfy the higher threshold of delivering homes in the most sustainable locations to ensure that development is as sustainable as possible.

As such, whilst HE supports the overall aspiration of the vision, it is noted that the terms do not replicate the aspirational threshold of the previous consultation Plan, and as such considers that the vision has been watered down. It is therefore suggested that the wording of the vision is amended as follows: “By 2040 and beyond, our residents will live in healthy, accessible and inclusive communities, where quality affordable homes, local facilities and employment opportunities in sustainable locations provide our communities with green and welcoming places to live, work and play and maximise our response to the climate emergency” [our emphasis added].

HE supports the identification of three objectives “providing sustainable levels of growth through the plan’, ‘providing better quality, greener development in the right locations’ and ‘prioritising the health and wellbeing on communities in delivering what is needed to support new development”, however objects to the fact that the largest Strategic allocation, Neatham Down, which later sections demonstrate, will not contribute to these three objectives.

Hallam Land Management

Plainly they draw from the characteristics identified in earlier stages of plan preparation. Moreover, as is evident when comparing those objectives and relevant aspects of national policy there is a high degree of alignment. We support these identified objectives. These objectives should frame the Local Plan's policies and proposals. The extent to which they achieve this will determine the extent to which the Local Plan guides successful outcomes.

Bloor Homes – Land East of Horndean (Hazelton Farm)

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.

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.

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.

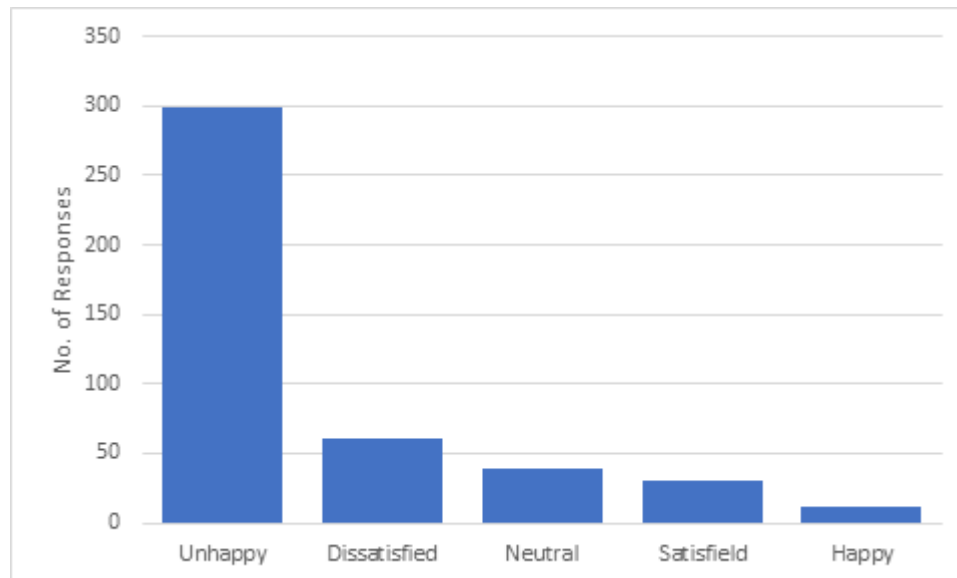
The NPPF states at paragraph 22 that 'strategic policies should look ahead over a minimum 15- year period from adoption'. EHDC Local Development Scheme (LDS) currently targets the Regulation 19 consultation for July 2024 with the Plan targeted for submission in December 2024. It is anticipated that the Examination in Public will take place in January 2025 with the Inspector's Report due by August 2025.

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.

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.

Chapter 3 Managing Future Development

Question: Chapter 3 Managing Future Development – How do you feel about this chapter?



Question: Policy S1 Spatial Strategy – What are your comments on this policy?

Some support for this policy. There is a need for more homes, and all types of homes. More housing is needed to keep up with needs. Specifically support more affordable housing. Whilst some support, would also like to see more emphasis on transport links and local employment opportunities. Welcome the reference at paragraph 3.6 of the document that the standard methodology will be used to generate a minimum housing number for the district

With regards to housing numbers, a lot of comments saying the housing number is too high, overstated, excessive and not justified, with insufficient evidence to support it. There are lots of unsold homes (major flaw is that figures don't take account of number of houses that are for sale), and housing numbers should take more account of the market requirement (over 1800 homes for sale within 10 miles radius of Liphook). Some comments have stated it is difficult to understand how housing numbers are calculated to meet local need, full transparency on how numbers calculated is needed. However, some comments from developers saying the housing number is not high enough / the Council should plan positively for a higher number.

The amount of housing exceeds what is needed locally. The Government's affordability calculations are flawed in so far as they do not respond accurately to the specific pressures for more housing in East Hampshire. The price of housing reflects a desire by people from all over the place to migrate here and live in a pleasant area, to commute, retire or semi retire; it does not reflect the need for homes to service locally generated demand and local workforce requirements. The affordability ratio is also skewed by the factoring in of house prices within SDNP. These elements give us a number of houses that will have to be managed when in direct conflict with policies to protect the countryside and the character of the existing settlements.

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

Some comments query the buffer (the amount and the rationale), saying it is a random amount and not justified. There is no evidence that it delivers against its stated purpose i.e. to make homes more affordable. Basing the Affordability Ratio in East Hampshire on the 'work-place based earnings' distorts the conclusions. However, also where the Council can support other areas, this must be included in the Council's housing requirement and there must be a sufficient buffer between this requirement and overall supply to ensure the housing requirement is deliverable over the plan period. Concern that the Council has not taken full account of the unmet needs that will arise in the parts of EHDC in the SDNPA or in other areas of the PfSH area. In addition, the buffer in supply of around 6% is too small to provide a sufficient confidence that needs can be met over the plan period. Also commented that these unmet needs are based on estimates and that the total unmet needs of neighbouring authorities are currently unknown. More sites should be allocated to take account of unmet needs of PfSH

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

Some comments query the difference between the number of homes proposed on a site in the draft local Plan, and that proposed by developers, noting that if the developer numbers are 'correct' then less greenfield is needed, and the Council needs to have a more definitive position on this.

Comments state the number should be reflective of the presence of the SDNP as a constraint to development (more on that in the 'distribution').

The housing number is advisory and not compulsory. The number should relate to the land available.

The plan period needs to be extended. The Council should look to all tier settlements in the hierarchy to deliver homes through a range of small, medium, and strategic sites – to avoid over reliance on large sites that will deliver towards latter end of plan period.

Wates is concerned that the envisaged Spatial Strategy fails to propose an appropriate Housing Requirement. Wates has three fundamental concerns; 1. The lack of provision for unmet needs arising from the South Hampshire authorities & the Duty-to-Cooperate; 2. The appropriate Housing Requirement for years 2021/22 to 2022/23 of the Plan period; and, 3. The significant need for affordable housing, which is not fully addressed.

To deliver a sufficient supply of homes the Spatial Strategy S1.1 should accord with NPPF paragraphs 60 and 61 using the standard method as an advisory starting-point and then comparing this to the local housing need figures in the most up to date evidence base. In this case the HEDNA concludes that 517 homes per annum, which is an additional 39 homes per annum above that proposed in the Draft Plan

With regards to windfall contribution - there is no compelling evidence that the suggested quantum of windfall development will be delivered or that it is a reliable source of housing supply at the level suggested. At absolute maximum should the council expect windfall delivery rates to be at 15% rather than the 21.2% predicted in the Draft Plan. If we apply this rate to the target figure of 6225 dwellings, this means that 934 dwellings (at best) will be delivered through windfalls. The Council therefore, through the emerging plan, needs to plan

proactively for the delivery of 386 additional dwellings just on the basis of the flawed windfall approach alone (we are sure other representations will be challenging the housing target more generally). More analysis in Bell Cornwell rep, PDF Part 1. Windfall is too high taking account of delivery.

With regards to the distribution of development, comments that the proposed strategy is not in line with earlier consultation responses which wished to see development more evenly spread across the district. Clear more housing is needed but needs to be shared fairly across the district. The text states that each tier will contribute is not true due to the restrictive settlement boundaries drawn to tightly around existing settlements.

Many comments received about Alton in relation to the distribution of development – using words such as unfair, unbalanced, unjustified. Many objections to the over development of Alton, it is not sustainable to allocate so much development to Alton. There is much that needs to be protected in Alton. Many comments objecting to the Tier 1 designation in the settlement hierarchy – Alton shouldn't be the only settlement in Tier 1 and querying why this has changed. Comments stating Holybourne should not be included with Alton in Tier 1. Many comments objecting to the proposed allocation of Neatham Down, and a few supporting it identifying infrastructure provision as a supporting factor. Most comments received in relation to this question relate to Alton.

With regards to distribution of development in relation to other areas; query why Bentley has been designated as a Tier 3 settlement when it is much smaller than other areas in this tier and with limited facilities, suggesting Bentley should be in Tier 4.

A few comments about other areas; Bordon should be Tier 3 as has no public transport and Liphook has a station yet categorised together. Too much housing in Bordon already and loss of woodland and green space. On the other hand, comment that Bordon has the infrastructure and brownfield sites to accommodate more housing, and would be a preferable location to Alton ; Four Marks and Medstead has already had a lot of housing without any improvements to infrastructure – more will bring people in rather than accommodate local need ; the numbers are too high for Horndean, Clanfield and the south generally – there is much more development proposed here than in other areas .

Whilst many comments received are about Alton, they also heavily focus on the presence of the South Downs National Park in East Hampshire. The main point of the vast majority of comments is the unfair impact the SDNP designation has on the rest of East Hampshire, resulting in high numbers of homes being unsustainably squeezed into a small area, and on the edge of the SDNP. The boundary is an arbitrary line on a map, but the impact has led to a complete skewing of development across East Hampshire. There needs to be a much more nuanced approach. On the other hand, some developers saying that the emerging East Hampshire Local Plan should seek to positively respond to these constraints to development within the SDNP area.

Housing that is needed in the SDNP should be built in the SDNP. A lot of comments focus on Petersfield, noting its capacity to take more development, and stating that it should be excluded from the SDNP. Petersfield is physically located within East Hampshire and has access to a major National Railway station. People need to live in Petersfield instead of commuting to it which they will be otherwise forced to do

The SDNP issues is more than just a theoretical issue, it impacts on communities and people's lives – the SDNP needs to sustain its own communities. There are land opportunities available that can take housing without making any impact on the overall beauty of the SDNP along the Causeway or to the north of the town within the ring road 'boundary'.

Calls for EHDC to 'push back' hard with the SDNP. Other references to the Duty to Co-operate and the querying the extent to which EHDC has discussed these issues with the SDNPA.

No evidence appears to have been provided within the current consultation as to whether the National Park are able to plan for this level of housing over this period, and it is noted that paragraph 3.7 of the Draft Local Plan states that "It will be for the South Downs National Park Authority (SDNPA) to work through its own process to calculate local housing needs for its area." It is not clear from the evidence base provided how his 'pragmatic approach' has been arrived at, and it is noted that this figure is less than the difference between the Standard Method approach set out in the Draft Local Plan and the 'disaggregated approach' – which is calculated above to be 123 homes per year. Firstly, the SDNPA assessment of overall housing need within East Hampshire using the Standard Method is 621 homes per year, not 587 as set out within the Draft Local Plan. Secondly, the assessed contribution within the part of East Hampshire that lies within the National Park is 165 homes per year, but using the 'bottom up method' this drops to 106 dwellings per year. This is lower than the figure assumed in the current EHDC Reg.19 consultation which is (as noted above) 123 homes per year, but more than the 'pragmatic approach' set out at paragraph 3.9 of 100 homes per year. This create a potential double shortfall. (Beverley Farm rep).

Some comments made suggestions regarding the distribution of development including; more evenly spread, more brownfield should be used – no evidence brownfield not been made priority, concentrate development close to railway stations and towns, where there is infrastructure, use existing properties at a realistic affordable price, revise the settlement hierarchy to take account of weather and light, no mention of walking to and from station in darkness. The SDNP would be a good location for more Traveller accommodation as they tend to be small developments.

Whilst commenting on distribution of development, one of the main concerns raised was infrastructure, primarily saying that the Local Plan does not identify sufficient infrastructure to support the new homes proposed, and that there is already a significant deficit of infrastructure. Comments saying there is not enough information available about current infrastructure and deficits.

With regards to infrastructure in specific areas; Bordon does not have the infrastructure to cope with more housing, there should be no more housing in Bordon until there is new infrastructure, the new health hub needs to be delivered and there are power issues ; Alton doesn't have the infrastructure to cope with more housing, there have been empty promises but services can't cope ; in Four Marks complete road and junction redesigns would be needed to accommodate more housing – it will make it harder to use sustainable modes of transport; and generally the A31 will need to be improved.

A notable comment about the SDNP and the Infrastructure Plan; the plan says "all retail need will be met through existing centres", but in reality EHDC area is bisected by SDNP area, and the largest centre is Petersfield. Residents in most Tier 2,3,4 locations are dependent on infrastructure/services within the SDNP area for example Petersfield for Urgent Treatment Centre, senior schools, libraries, opticians, dentists, larger shops, etc. Query how it will be ensured that infrastructure development and capacity of services within SDNP, that EHDC residents rely on, will be compatible with the EHDC development plan? The plan is untenable without this explicit linkage. Or is the plan to develop complete provision of facilities in places like Rowlands Castle, Horndean, Bordon? And if so, this needs to be clear in Infrastructure Plan, which is completely missing in the document.

On other issues, consideration should be given to the type and design (a suggestion that swift bricks should be used for building) of housing rather than just numbers. New builds are "visitable" but not "liveable" for people who depend on wheelchairs or have mobility issues

due to either age or illness. Also note that adverse impacts of new housing on the character of the area and rich heritage.

Concerns about the impact of development on the environment; loss of greenfield and wildlife, destroying dark night sky. Protection of the countryside and maintaining the character of local rural communities should be a top priority in Spatial Strategy. Increase flood risk, and light pollution. It is unachievable to get a biodiversity net gain of 10% on a site, which will kill the biodiversity. Offsetting in any way would be immoral. Should protect Gaps, e.g. that at Drift Road Clanfield. Note statement about avoiding coalescence, but the maps don't show sites already approved – e.g. the large site east of Horndean - that will radically and negatively affect people's perceptions of open space around Rowlands Castle.

Some comments question whether the strategy is sustainable, saying it's not sustainable to propose so many homes in locations not close to employment and walkable. The Plan is based on development pressure rather than sustainable solutions. There is too much focus on housing rather than creating sustainable communities

With regards to Traveller accommodation, a few comments objecting to the provision of Traveller accommodation, noting that there are some pitches in Four Marks not built out, and already a large amount of pitches in Four Marks.

The paragraph states that there is an identified need for 66no. gypsy and traveller pitches, and 47no. travelling showpeople plots in the EHDC LPA area up to 2036. This is greater than the 62no. and 46no. recorded respectively in the recently signed Statement of Common Ground (SoCG) between both LPAs. Clarification is needed.

Although sufficient provision has been made within Waverley Borough Local Plan Part 2 to meet the need arising from the gypsy and traveller community within Waverley during the plan period (up to 2032), there is insufficient surplus to be able to accommodate any unmet need arising from East Hampshire.

Portsmouth City Council - draft Policy S1 Spatial Strategy (and the relevant site allocations) highlights that only 2 permanent pitches for Gypsies and Travellers, and 12 permanent plots for Travelling Showpeople are provided for in the plan. This falls 388 significantly below the level of identified need, and would need to be justified with regard to available, suitable land supply. This should be considered with particular attention to the surplus land supply identified for housing. The impact of such significant under provision of land to meet the accommodation needs of Gypsies and Travellers could have cross boundary impacts across the sub-region and PfSH area, and raises concern.

With regards to Employment, there is no significant additional employment provision meaning more commuting. Employment needs have not been met by the plan and will not enhance economic growth. More employment is needed to support housing / more needed in appropriate places. There is no provision for increasing employment opportunities for the thousands of additional residents planned. Very clear plans for where to put houses, no plans for services and employment. Further work is required on employment possibilities and public transport needs to ensure carbon emissions do not increase excessively. Employment land should be concentrated, as the housing is, to key areas.

"There is a demand for employment floor space" – query this with so many premises standing empty on existing business parks, and question how this is justified.

Concern about the decline of Alton, saying more houses won't support the central shops.

Four Marks and Medstead have underused units in the Industrial Park station approach, as businesses don't favour the area due to cost of these and lack of supportive other facilities. There is no employment in Four Marks

Query why is the development of the Solent Free Port is not addressed (elements are 4 miles from Horndean). That will affect local employment,(including the possible relocation of businesses from existing employment centres) , traffic and sustainable transport needs

With regards to retail: The retail needs are currently not being met by EHDC, the lack of opportunity in the Alton town centre to encourage retail units is negligible. The lack of public transport from all parts of the area is deficient, the services are too spread out in terms of arrival and departure times. The carparking charges and lack of free spaces in the town centre further puts people off from shopping. Existing retail floorspace already under occupied due to unaffordable rents unlikely to change. There are more empty shops than ever before.

Question: Policy S2 Settlement Hierarchy – What are your comments on this policy?

Many respondents objected to or expressed concern about the proposed settlement hierarchy, particularly the order in which settlements had been placed in the hierarchy of Policy S2. These objections and concerns were often expressed in terms of the potential environmental, infrastructural or community impacts of proposed development associated with a settlement's position in the hierarchy; or were expressed in terms of the methodology used to determine the hierarchy and its perceived deficiencies. Some respondents argued against the use of any settlement hierarchy, suggesting that development should be dispersed between all towns and villages, whilst prioritising the redevelopment of brownfield land. However, support was also expressed for the use of hierarchy as a way of determining the appropriate scale and distribution of new housing in proportion to the variety and number of local services and facilities.

Many respondents objected to the position of Alton as the sole Tier 1 settlement within the hierarchy. There were suggestions that Alton should be accompanied by Whitehill & Bordon within this tier of the hierarchy and (in some cases) also Liphook. This was based on previous versions of the settlement hierarchy and considerations of the availability and capacity of local facilities, services and infrastructure within these settlements. It was suggested that the on-going regeneration of Whitehill & Bordon meant that there would be additional infrastructure capacity to accommodate additional housing to a greater extent than Alton.

However, other responses supported identifying Whitehill & Bordon as a Tier 2 settlement, or objected to additional development within Whitehill & Bordon on the basis of potential impacts on biodiversity, local infrastructure, traffic congestion and the lack of suitable retail, leisure, health and cultural attractions.

Many objected to the proportional distribution of development of the Draft Local Plan in terms of which settlements would be the focus for new housing. The scale of new housing development in/around Alton was felt to be disproportionate and environmentally destructive. Concerns were raised in terms of the impacts of this level of development on the landscape setting of Alton; the distinctive and individual characters of Holybourne and Neatham; local biodiversity (notably the chalk stream habitats of the River Wey); road congestion and wastewater treatment capacity; health service, education and leisure facility capacity constraints; local air quality; and the lack of support for increased walking, cycling and the use of public transport modes (given the distances, topography and/or attractiveness involved in routes to/from proposed sites).

There was a suggestion that too much development was being proposed within the planning area taken as a whole. Some considered that settlements within the South Downs National Park (Petersfield and Liss) should be included in an overall settlement hierarchy for the district. It was suggested that more of the district's housing requirement should be

accommodated within the National Park in order to support local housing needs where they arise and to avoid adverse disproportionate landscape impacts in the rest of East Hampshire.

Whilst there was some support for using the Council's Accessibility Study to determine a settlement's position in the emerging hierarchy, there were concerns over the use of population data to elevate larger settlements within the hierarchy. Some respondents argued that population data should not be used in this way because of their opinion that local infrastructure has not kept pace with recent development and so is already under pressure. This argument was used to suggest that Four Marks should be placed in Tier 4 of the hierarchy rather than Tier 3. Similarly, concerns were often raised about the position of Bentley and Holt Pound (both Tier 3) within the hierarchy because of deficiencies in local service provision and relatively small residential populations. Some respondents suggested that not all Tier 3 settlements are equally sustainable given the differences in the accessibility scores for settlements within this tier.

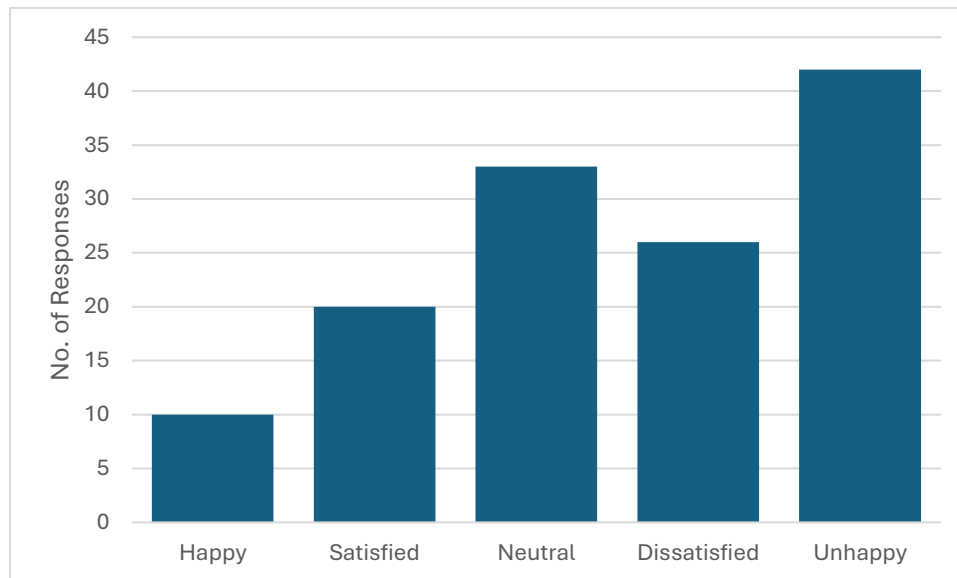
Responses from the development industry supported the identification of particular settlements within the hierarchy (e.g. Alton as Tier 1, Horndean and Liphook as Tier 2 settlements) but there were also objections to the use of the accessibility study and the focus on accessibility by walking and cycling modes of transport for purposes of determining the hierarchy. Several developers suggested alternative hierarchies based on their perceptions of East Hampshire or using a preferred approach.

Question: Chapter 3 Managing Future Development – Please provide any further comments on this chapter

Many comments on this question repeated the views provided in relation to Policies S1 and S2. General views on the unaffordability of housing and the need for sites to serve the needs of the travelling communities; concerns about the environmental and landscape impacts of proposed development (e.g. the loss of countryside/agricultural land); and the general lack of infrastructure to support the proposed growth were reiterated. Some respondents thought that the proposals for the scale and distribution of new development were excessive and/or detrimental to local character. Respondents commented that the chapter was 'interesting and informative', 'ill-thought through' or that 'the text was too small'. There were suggestions that the plan should focus more on the provision of new infrastructure.

Chapter 4 Responding to the Climate Emergency

Question: Chapter 4 Responding to the Climate Emergency – How do you feel about this chapter?



Question: Policy CLIM1 Tackling the Climate Emergency – What are your comments on this policy?

Many responses supported the idea of prioritising efforts to mitigate climate change and adapt the planning area to its effects; although some responses disagreed that there was a climate emergency or that it should be a priority for the East Hampshire Local Plan. Some considered that the policy would need to be more specific and include measurable targets for mitigating greenhouse gas emissions despite its overarching, strategic intent. Many responses suggested that the policy would be incompatible with the development of large greenfield sites and the likely continuance of car-dependent lifestyles in East Hampshire. Existing planning policies were criticised for failing to take sufficient action to reduce emissions and reduce the impacts of flooding.

Representations from the development industry highlighted the Government's recent Written Ministerial Statement (December 2023) and suggested that CLIM1 is inconsistent with this statement of national policy. There were suggestions that the Council should rely on building regulations and/or that more evidence would be required (such as in relation to the impacts on development viability) for purposes of establishing more onerous standards for energy efficiency. Some responses advocated a phased approach to policy implementation recognising supply chain and labour constraints for development. Additional guidance was requested to clarify the requirements for retrofitting (including for heritage assets), and in relation to the form and content of any required 'sustainability statement'.

Question: Policy CLIM2 Net-Zero Carbon Development: Operational Emissions – What are your comments on this policy?

Most responses support the principle of reducing the greenhouse gas emissions that would result from using new development, but there was a clear split between responses that were generally supportive of the approach to net zero development in CLIM2, and responses that were generally critical of any approach that departed from current and future building regulations (which are not net-zero, but would only be 'net-zero ready' after introduction of the Future Homes Standard, scheduled for 2025).

Supportive comments identified a range of practical considerations, focusing on how aspects of the policy would be implemented. More information was requested on the form and content of the proposed sustainability statements that would need to be submitted by applicants, whilst some were concerned about whether council officers have sufficient technical expertise to ensure effective implementation of the energy requirements. Greater clarity on the arrangements for the post-completion monitoring and reporting of energy performance would be welcomed by some. Concerns were also raised about the apparent inconsistencies between the aim of the policy and the climate-related effects of further greenfield development. The flexibility of the policy was criticised as it was thought that this would give developers too much scope for securing exemptions to the policy requirements.

Responses that were generally critical of the policy also identified practical concerns, often in respect of the perceived impacts on the viability of development (some respondents felt that costs had been underestimated) or on the perceived impacts on the rate of housing delivery, because of skills and/or building material shortages to meet the requirements. A phased approach to implementing the proposed requirements was preferable to some respondents from the development industry. Similarly, some respondents suggested that any additional costs to householders should be avoided in light of the current economic context.

The Written Ministerial Statement of 13th December 2023 was cited in some responses, with respondents noting that CLIM2 departs from its guidance. The policy was therefore described as unsound. Some respondents argued that no local policy was needed because building regulations were thought sufficient to reduce emissions from buildings. However, some responses stressed that emissions that are unregulated by building regulations – therefore outside of the scope of the guidance from the ministerial statement – should still be taken into account. Some responses suggested a need to go further than net zero to deliver carbon negative development and/or a need to incentivise developments that would exceed the policy requirements.

Some comments on the policy requirements for renewable energy generation identified concerns about the potential for development sites to delivery sufficient on-site renewable energy. Other comments raised fears about the potential loss of greenfield sites to meet the policy requirements for renewable energy, suggesting that this may lead to a loss of agricultural land and to adverse landscape impacts.

The importance of retrofitting existing dwellings to reduce their emissions was raised within some responses, whilst some proposed the inclusion of tangible measures such as improved arrangements for household recycling or the installation of heat pumps as suitable policy requirements.

Question: Policy CLIM3 Net-Zero Carbon Development: Embodied Emissions – What are your comments on this policy?

Support was often expressed for the principle of lowering embodied greenhouse gas emissions, but concerns were raised in some responses over the effects that the preferred approach could have on development viability and housing delivery. Impacts on viability were expressed in terms of the perceived expense of renovating or redeveloping existing buildings as opposed to their demolition, to make way for new buildings. Some responses supported this policy as part of an approach to prioritising the redevelopment of brownfield land.

Although it was supported in some responses, the requirement for whole life cycle assessments of greenhouse gas emissions (CLIM3.2) was also criticised in other responses as premature. It was suggested that the development industry and its supply chains are not yet ready to deliver the requirements, whilst some responses suggested that achieving reductions to embodied emissions could prove difficult because (e.g.) natural building materials such as timber need to be imported. Limitations and uncertainties regarding the emissions associated with building materials (their production, transportation and end-of-life disposal) were noted in some responses, which advised that these issues should be taken into account when reviewing the policy for the next stage of the Local Plan. It was thought that these issues could affect the implementation and enforcement of the policy.

There was general support for the principal of retaining and re-using existing buildings and materials (CLIM3.3) although several responses suggested a need to further consider the links between this policy and others aimed at conserving and enhancing local character and built heritage. Historic England suggested that the heritage significance of existing buildings should be taken into account when determining how to renovate and retrofit a building.

Question: Policy CLIM4 Renewable and Low Carbon Energy – What are your comments on this policy?

Many responses expressed or indicated support for enabling more renewable energy generation within the planning area, but a variety of specific concerns were raised relating to the potential loss of greenfield sites, policy flexibility to deal with emerging technologies (e.g. hydrogen), and the need for more specific policy criteria that would allow the industry to understand when a proposal would be acceptable to the planning authority.

Some responses suggested that greater priority should be given to insulating new buildings and lowering energy demands, as opposed to focusing on renewable energy generation; although these responses still recognised the need to transition to more sustainable forms of energy generation. Other responses suggested that new text should be introduced to the policy to support upgrades to the electricity grid; that community-based renewable energy schemes should be required to support major development; or that more policy support should be offered to small-scale (householder) renewable energy development.

More details were requested through revisions to the policy on the scale and potential location of renewable and low-carbon energy projects that could be deemed acceptable. Hampshire County Council noted that specific protections from the impacts of development on the largely rural character of the PROW network should be provided through amendments to CLIM4.1c). Historic England suggested that potential impacts on the setting of heritage assets should be recognised in a revised policy, whilst the South Downs National

Park Authority requested that applications within the setting of the National Park should be accompanied by a landscape and visual impact assessment.

Question: Policy CLIM5 Climate Resilience – What are your comments on this policy?

A wide range of suggestions were received for improving the climate resilience of new developments. These suggestions ranged from ensuring high standards of insulation and air tightness in new buildings to providing more trees in urban areas, reducing overall resource consumption and giving higher priority to the avoidance of flood risks when determining where new development should be located. Some responses suggested that further thought was needed to understand the design and layout implications of creating climate resilient environments, such as how best to accommodate opportunities for local food growing and whether non-native plants that are more drought resistant should be preferred.

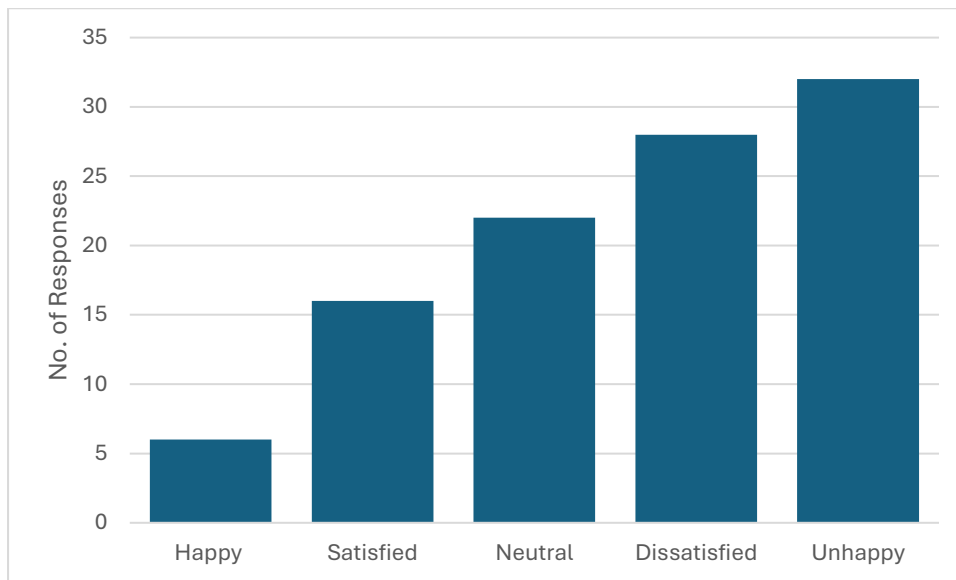
A potential tension between delivering climate resilience in new development and delivering other urban design qualities (e.g. a compact layout of new homes with public spaces overlooked) was identified in one response., which suggested that a balanced approach would be necessary. Natural England identified the multiple benefits of nature-based solutions (e.g. areas of habitat restoration and natural drainage features) for people and the environment. The South Downs National Park Authority expressed support for CLIM5.2b) but suggested that this could be expanded to ensure that connections to the wider habitat network – including within the National Park area – are considered.

Question: Chapter 4 Responding to the Climate Emergency – Please provide any further comments on this chapter

Many responses to this question reiterated or reformulated previously expressed concerns with the individual CLIM policies. General concerns about the consistency of the CLIM policies with other aspects of the local plan – such as the proposed development strategy featuring greenfield sites including land at Neatham Manor Farm – were raised. Greater policy support was requested to assist with adapting the existing urban areas of East Hampshire to climate change. Fears over the cost of transitioning to cleaner, greener energy supplies were expressed, along with concerns over the adequacy of the electricity supply network to meet growing demands. Several responses suggested that more policy requirements were needed in relation to transport, given the large contribution that this makes to the district's greenhouse gas emissions.

Chapter 5 Safeguarding our Natural and Built Environment

Question: Chapter 5 Safeguarding our Natural and Built Environment – How do you feel about this chapter?



Question: Policy NBE1 Development in the Countryside – What are your comments on this policy?

(HCC) Suggest strengthening NBE1:1 with a number of edits. One relating to criterion c by reference to expected standards for the distance between the development site and access to sustainable transport modes. Adding new criterion to protect public rights of way and a supporting paragraph.

(Portsmouth Water) suggest an edit to criterion k by deleting 'small scale' as this contradicts para 5.12.

(Southern Water) Do not support current wording of policy as it could create a barrier to statutory utility providers from delivering essential infrastructure required to serve existing and planned development. Proposed amended wording to NBE1.1.

(Beech PC and Headley PC) Agree with policy but suggest additional edit.

(M&FMNP, Worldham PC, Grayshott PC, Historic England, F4FM, SMASH, Individual) Support policy.

(Kingsley PC and Rowlands Castle PC, Individual) There should be no further encroachment beyond settlement policy boundaries.

(Selborne PC) Policy needs to set out how important protecting the countryside from development is.

(Whitehill Town Council, Whitehill & Bordon CP) feel this policy is unworkable due to poor transport infrastructure in the district.

(Alton Climate Action) Do not agree with some points raised in the policy. There should be explicit policies to ensure that all development fully mitigates any adverse impacts on climate and biodiversity.

(CPRE) The policy should state that development will only be permitted where it can demonstrate a countryside location.

(Common Place) Overall the policy is generally supported but there are a number of concerns that most of the potential development proposals are on greenfield sites in the countryside which will have a negative impact on nature and biodiversity and go against the principles of this policy. It was suggested that, if permitted, development in the countryside should be a last option and usable green space should be allocated and preserved alongside.

Some responses felt the policy as it stands needs to be clearer with regards to the criteria. Whilst others considered the policy to be quite restrictive and could support a small amount of development outside SPBs.

One response suggested that this policy should link to other key topics in the Local Plan, such as Biodiversity Net Gain, Design and Climate Change.

A number of responses referenced specific settlements where it was felt that potential allocations extend into the countryside beyond the existing Settlement Policy Boundaries. Also, allocations are impacting on areas currently protected by woodlands, heathlands, landscape and chalk streams, and the policy appears to be moving development away from the South Downs National Park and into areas within the Local Plan area.

Some responses raised concerns regarding the nature of rural exception sites; that they are no longer sustainable and could be sold at market value when sold on.

(Developers) One response considered the policy flawed as it does not encourage the development of all Previously Development Land (PDL) in the countryside which should be preferable than building on greenfield land. PDL should be considered if it meets the tests in para 5.12 of NBE1. PDL can also not be 'suitably or unsuitably', it either fails or meets the definition of PDL. Good examples are Hart DC and B & D policies.

One developer's response supported policy NBE1 in relation to 10% BNG.

One response felt policy NBE1 supports a narrow set of circumstances which do not allow for sufficient flexibility to respond to changes of circumstance such as a shortfall in housing supply. See Harborough Local Plan 2011-2031 Policy GD2 as a good example.

Another response suggested that the policy is too restrictive in the types of development it allows for within the countryside and needs greater flexibility if it is to accord with the NPPF.

An addition to the criteria supporting minerals development in the countryside (with reference made to the Minerals and Waste Plan) should be added to the policy and the Policy should be extended to include specific circumstances set out in Neighbourhood Plans.

NBE1 should also add a criteria which supports minerals and waste development in the countryside or make reference to the Hampshire Minerals and Waste Local Plan.

One final response felt NBE1 has become more restrictive than its predecessor with no explanation. The policy goes against PD rights such as Class Q which allows agricultural buildings to be converted into dwellings and Class MA commercial buildings to be converted

into residential including those in rural areas and with changes in lifestyle (working from home etc) rural housing is no longer inherently unsustainable.

Question: Policy NBE2 Biodiversity, Geodiversity and Nature Conservation – What are your comments on this policy?

(Natural England) The policy opens up opportunities for environmental gains, including nature-based solutions to help adapt to climate change. Any habitat creation and/or enhancement may also deliver a biodiversity net gain.

(HCC) Nature conservation contributes to prevention of ill-health through benefits to both physical and mental health of residents via opportunities for nature conservation.

(Portsmouth Water) Support policy but for bullet point b that references biodiversity features. Also suggest editing the text regarding offsetting measures.

(SDNPA) Fig 5.1 needs to include NNRs, LWS. Recommend expanding NBE2.1(e) to encourage linkages between EHDC and SDNPA LPA areas.

(M&FMNP, SMASH) suggested the policy should be made stronger.

(Whitehill Town Council) felt further work needed to be done to this policy and suggested it should be separate to the Local Plan.

(HIWWT) Amend policy to set a target above the mandatory 10%. Disappointed the LNRS does not appear much in the policy and should be the foundation tool for the Local Plan.

(House Builders Federation) Do not require 10% BNG in both NBE2 or 3.

(Woodland Trust) Support policy.

(Common Place) Overall there was support particularly funding which it is considered to be the key to enhancing, managing and monitoring nature conservation. Although it was highlighted that allowing developers to offset mitigation then allows more intensification on a proposed development site.

A few responses related to additional changes or edits to the draft policy to ensure the further safeguarding of biodiversity and geodiversity. These are as follows:

NBE2.2 to be deleted.

*NBE2.1 should read 'development proposals will **only** be permitted'.*

Quite a few of the responses highlighted concern around the protected areas in Whitehill & Bordon and that they should be protected from further development. One response referred to swift bricks and recommended these be added to the policy (these type of features are excluded from the DEFRA BNG metric).

(Developers) BNG is repeated in NBE2 and 3, is this required?

Question: Policy NBE3 Biodiversity Net Gain – What are your comments on this policy?

(EA) support policy but needs editing by adding a reference to the water metric.

(Natural England, CP, RSPB, Woodland Trust, PeCAN) support policy but would welcome investigating a more ambitious BNG target that go beyond the existing 10% or how the 10% will be reached. Further NE advice can be embedded into this policy.

(Historic England) Suggested adding text to acknowledge the relationship between the natural and historic environment. Also adding a link to the policy NBE10.

(DiO) When drafting biodiversity policies need to be aware that some forms of environmental improvement or enhancement may not be compatible with aviation safety.

(Portsmouth Water) support policy.

(Headley PC) repetition with NBE2 and 3.

(House Builders Federation) Do not require 10% BNG in both NBE2 or 3. Part d should refer to the hierarchy re BNG (if not locally then anywhere in the country). It is not for the Council to say where net gains are due to be delivered, the further away the more costly for the developer.

(Common Place, Alton Climate Action, Fight4FourMarks, PeCAN and Whitehill TC, Whitehill & Bordon Community Party) Policy unclear on how long term management plans will be monitored, financed and enforced.

(Common Place) The policy was overall supported and some responses acknowledged the need for a separate BNG policy. One response did remark how can offsite BNG replicate original loss and how can you decide on net gain when there is no finite number or calculation. A few responses suggested that BNG should be linked to neighbouring authorities BNG and should be in the area in question.

(Developers) Questioned whether the policy is necessary as it is a statutory requirement (10% BNG). The NPPF is clear, para 16 (f), that plans should avoid unnecessary duplication of policies (including within the NPPF). Suggested an edit to NBE3 to remove 'at least' from first para.

A few developers supported the 10% BNG.

Question: Policy NBE4 Wealden Heaths European SPA and SAC sites – What are your comments on this policy?

(Natural England) satisfied with the policy but questioned why it only extends to the Wealden Heaths Phase II SPA. A joint strategic approach should be implemented that extends across the entire Wealden Heaths SPA and SAC complex. The plan should make clear how additional development via windfall sites will mitigate the impact of Phase I sites. However, are supportive of the SAMM mitigation strategy.

(Waverley BC) Support mitigation strategy for Wealden Heaths SPA.

(SDNPA, Headley PC, Whitehill TC, Whitehill & Bordon Community Party and M&FMNP) Support policy.

(RSPB) Insufficient evidence to show SAMM only strategy will mitigate recreational disturbance. Lack of consistency between SPAs in the district re 5km buffer zone and do not

agree with mitigation and where is evidence to justify 50 or 20 dwellings. WHPI SPA should be referenced in the policy not just implementing the policy. A joint up approach to mitigation between Waverley BC and EHDC is required.

(Common Place) The policy is strongly supported and seen as highly important. However, one response is concerned with the amount of housing already in Whitehill & Bordon which has had a negative effect on the area and therefore the protection of the SPA is highly important. In relation to mitigation, one response asked whether 'in perpetuity' should mean for ever and not just 80 years.

(Developer) support policy NBE4.

Question: Policy NBE5 Thames Basin Heaths Special Protection Area – What are your comments on this policy?

(Natural England, M&FMNP) support policy.

(WTC, Whitehill & Bordon Community Party) Agree with policy but asked where the funding is coming from.

(Common Place) This policy is supported with comments welcoming the protection of the Thames Basin Heaths SPA and seeing it as important. One response asked how funding will be made available to help provide mitigation.

Question: Policy NBE6 Solent Special Protection Areas – What are your comments on this policy?

(Natural England, TVBC, B&D, M&FMNP, Common Place) welcome this policy.

Question: Policy NBE7 Managing Flood Risk – What are your comments on this policy?

(EA) Map should include all watercourses not just main rivers. NBE7.4 should be edited to include:

“This includes encouraging the use of Natural Flood Management solutions and Nature Based Solutions within SUDs features”.

(Woodland Trust) Suggest adding edits to the policy:

7.1d add at end ‘and natural flood management’.

(Natural England, Portsmouth Water, Waverley BC, Headley PC, Rowlands Castle PC) welcome this policy.

(Southern Water) supports the overall intention of the policy, particularly reference to SUDS. Have suggested a few edits to policies NBE7.2/3 re SUDS and sewer flooding.

(HCC) Support SFRA work. Policy should link to the County Council's Catchment Management Plans (priority areas) (and other references in para 5.57). Have suggested amended wording.

(Thames Water) Suggested an edit to the policy to address surface water drainage.

(Alton Climate Action) Felt there should be a presumption against any development in flood risk zones.

(CPRE) Support policy but with recommended edits. Add wording which highlights the multi benefits of SUDs and how plans will set out their long-term maintenance.

(F4FM, M&FMNP) Criterion f should include surface water runoff as not highlighted on flood maps.

(Common Place) A number of responses are concerned with the impact from some of the proposed allocations on the chalk streams, that development would increase flood risk and cause water pollution. One response requested an edit to the draft policy as follows:

NBE7.1 should read "... Will only be permitted if all of the following requirements are satisfied."

SUDs are fully supported by a number of responses, however, concern was raised regarding deep boreholes in areas considered for SUDs in Four Marks and who was the responsible body is for managing SUDs. A few responses are concerned that surface water flooding was a growing issue and raised that mapping did not actually show where surface water flooding had actually occurred. A few asked what were the Council going to do to ensure there is no net increase in surface water runoff from development.

One response raised a query on climate change allowances and recommended they are referred to in the policy.

All proposed allocations require a sequential test which includes looking at surface water flood risk not just FZ 2 and 3.

(Developers) A few responses supported the systematic approach to flood risk assessment and management within housing development set out in Policy NBE7.

(Developer) One response was concerned particularly with surface water flooding on Five Heads Road. Also, on Catherington Lane there are issues with drainage. It is considered there is not a strategy on how the increased surface water and sewage, which is already causing considerable issues in the Southern Water catchment area for Budds Farm, will be managed.

Question: Policy NBE8 Water Quality, Supply and Efficiency – What are your comments on this policy?

(EA) Page 5 should include reference to Natural Flood Management and Nature Based Solutions.

(Portsmouth Water, Headley PC, PeCAN, CPRE) Welcome the policy and water efficiency target.

(HIWWT) support water efficiency target but would like it to go down to 90 litres. Wish to see the Catchment Based Approach Chalk Stream Strategy embedded within the Local Plan (more investment on adequate supply and treatment infrastructure but with no additional

burdens on the chalk aquifer abstraction). Recommend more detail on the protection and enhancement of rivers in new developments. Suggested a policy in their response.

(Southern Water) supports aim of the policy. Suggest additional edits to NBE8.3 re connection of surface water to the combined sewer.

(Natural England) in advance of permitting Southern Water's HWTWRP uncertainty remains with regards water resources and the impacts of abstraction on protected areas in Southern Water's catchment area. Welcome 95 litres per person per day water efficiency target.

(M&FMNP) supports this policy. Where development is close to a water aquifer, drainage solutions suitable for SPZ1/2 locations should be carried out which do not pollute the water source.

(CPRE) Strong support but would like reference made to the installation of grey water systems, rainwater storage and recycling systems in relation to water efficiency measures.

(House Builders Federation) Do not consider para 8.3 necessary and 9.5 litres per person per day is inconsistent with national policy on optional technical standards.

(Common Place) A few responses supported the water efficiency target which goes beyond optional Building Regs requirement. However, there are a number of responses that highlighted there is insufficient evidence to support the water environment. A thorough study on the water and waste impacts should be carried out to show how SDNP, the Water Companies and the Council are working together.

A few responses felt that there was inadequate sewage capacity in certain areas and any upgrades should be in place before new large scale development takes place. A further concern related to the protection of aquifers. One response considered the policy too ambiguous and it required further guidance.

(Developers) 95 litres per person per day goes beyond both the mandatory 125 lpppd and optional 110 lpppd requirements. This requirement needs to be properly evidenced. However, some developer responses supported the 95 lpppd requirement.

Concerned with using conditions to restrict occupation prior to the delivery of off-site upgrades for water/wastewater infrastructure. This could cause delays to the delivery of housing. The developer pays a charge to the relevant provider on a per plot basis, therefore no obligation on the provider to deliver the necessary infrastructure. Recommend LPAs work with water companies to understand when upgrades to wastewater treatment works will be made and plan accordingly.

Amend policy relating to 95 lpppd as this is enforceable for dwellings on schemes which permission is granted. Suggest an edit as follows:

*Residential dwellings.....95 litresso is not technically feasible, would make the scheme unviable , **or is subject to an existing planning condition allowing a different amount.***

Question: Policy NBE9 Water Quality, Supply and Efficiency – What are your comments on this policy?

(EA, PeCAN, Common Place) Considered nutrient neutrality should apply to all development (particularly commercial).

(Natural England) welcomes this policy and supports the work the Council are doing alongside PfSH on nutrient neutrality. Strongly recommends the Council includes a nutrient

management plan or similar strategy to offset the delivery of increased nutrients from the Local Plan development and to achieve nutrient neutrality. Noted that phosphorus is still a limiting factor within the River Itchen SAC, therefore, the local plan should seek to preserve water quality on the Itchen and ensure that the local plan and windfall development will not increase the phosphorus loading on the SAC.

(Portsmouth Water) Fully support this policy.

(Thames Water) Generally support the policy but recommend some edits. The Plan should assess the impact of any development within the vicinity of existing sewage works/sewage pumping stations – 800m of STW or 15m Sewage Pumping Station.

(Surrey CC) NBE8.2 reference to SUDS is useful.

(CPRE) Support and suggest adding to NEB9.1 that mitigation should be within the same catchment.

(HIWWT) want to see a preference to mitigation schemes which deliver wider environmental benefits.

(Individual) One response did not agree with the purchasing of off-site credits to mitigate the harm. Mitigation. Did not improve situations but just attempts to minimise the harm.

(House Builders Federation) Recognised the need for this policy but wanted it noted that the harm created by new homes is minimal.

(Common Place) A number of responses received supported for this policy.

One response highlighted that more information on the risk to the River Itchen SAC from further development in Four Marks is required. Two proposed allocation sites are located at the top of the Itchen groundwater catchment and it was questioned whether these sites meet an HRA by addressing the nutrient issue in this catchment.

A couple of responses required more detail on nutrient neutrality measures, such as who is responsible for ensuring the measures are met and monitored.

(Developers) Add reference in the policy or text to the 'Position Statement and Mitigation Plan'.

Question: Policy NBE10 Landscape – What are your comments on this policy?

(Natural England) welcomed the further evidence which has been carried out to support this policy, namely 'valued landscape addendum' and 'Landscape Capacity Study'.

(Historic England) The policy should acknowledge the relationship between the natural and historic environments. Para 5.103 is a re write of the definition of historic environment so not sure if required. Para 5.104 needs to include reference to Registered Parks and Gardens and non-designated heritage assets.

(SDNPA) Support NBE10.2(d) but should consider an overarching policy to development in the setting of the SDNP to seek to further the National Park purposes. Would reduce the need for repetition in other policies.

(HCC) recommend including a requirement that proposals must respect the sense of place, sense of tranquillity or remoteness, and the quiet enjoyment of the landscape from public rights of way (add an additional point NBE10.2).

(Headley PC, Whitehill TC, Worldham PC, Whitehill & Bordon CP) support policy.

(CPRE) strong support but with some concerns and recommendations for edits:

NBE10.1 add 'sense of place'

Sub para added to NBE10 – tranquillity and dark night skies

Amending sub para (b) to include ... (including key views).

Although the policy and text highlights the value of 'valued landscapes' there is no specific policy to protect valued landscapes. Suggested looking at other LPAs who have suitable policies.

(Common Place) A number of responses considered landscape to be as important a consideration as housing types, heights and planting in development proposals.

A few responses are concerned that any development in Alton will have a negative effect on the overall landscape value, both relating to views and light pollution.

Some responses considered that the protection of valuable agricultural land, trees and hedgerows and important landscape features should be stronger in the policy. Developing greenfield sites fails to protect local valuable landscapes.

One response supported NBE10.2 as it considered it was crucial for any development just outside the SDNP. Another response felt that NBE10.2a 'the setting of the SDNP' should not be a planning consideration unless severe harm can be demonstrated.

A few responses suggested edits or particular points which should be considered or addressed in any further edits of the policy. These included: Plant small native established trees in more areas which includes native hedging to improve landscape; visual amenity and scenic quality should apply to areas outside the SDNP; landscape and wider setting should be considered more thoroughly when looking at the potential allocated sites.

(Developers) Questioned the need for this policy as covered in other policies, namely DES1 – DES2). If retained, it should outline that 'harm' and the scale of potential 'harm' to the landscape will need to be assessed and determined, by the applicant and the deciding authority. Should an internal balancing exercise be included in the policy which requires an assessment of the identified level of harm against any proposed public benefits of a proposal.

Review policy wording in line with the NPPF re only using 'identified quality' re valued landscapes.

Any large greenfield site is likely to result in some contradiction to this policy regarding 'no significant impact'. This policy deviates from the NPPF which states whilst development should be sympathetic etc policies should not prevent or discourage appropriate innovation or change (such as increased densities). There is no policy in the Local Plan which reflects making effective use of land and achieving appropriate densities.

One developer response supported NBE10 which encourages developers to adopt a landscape-led approach.

Question: Policy NBE11 Gaps Between Settlements - What are your comments on this policy?

(Headley PC, Grayshott PC, Rowlands Castle PC, Worldham PC, Whitehill TC, Whitehill & Bordon CP, Individuals) support policy.

(Beech PC) agree with policy but not the proposed boundaries of the defined gap between Alton and Beech. Two proposed allocations remove the existing agreed gap.

(M&FMNP) commend the expansion of the Medstead & Four Marks NP Local Gap. The policy however should be expanded to include any gaps defined in Neighbourhood Plans.

(Kingsley PC) more needs to be done to protect and where necessary enforce non development of the gaps between settlements.

(Medstead, Beech & Wivelrod) wish to designate an area for inclusion as a Gap.

(CPRE) Support but their understanding of the policy is that the gap policy refers to all areas outside the SPB.

(Common Place) Overall there is a lot of support for this policy; that it is vital to preserve extant gaps and stop coalescence. However, some responses felt that more needed to be done to protect gaps. The policy was too loose, needed some form of enforcement, some allocations are contrary to this policy as they do not only encroach gaps but are proposed in existing gaps.

A few responses related to additional changes or edits to the draft policy. These are as follows:

Amend page 124, paragraph 5.82, 3rd bullet point, 3rd line to read 'from highways, railways and public rights of way'.

Where gaps have been identified, a clear definable map should be provided.

One response is concerned that the Alton to Chawton gap had been reduced in size and therefore no longer appeared to be effective or necessary. Whereas another response questioned that the policy states that new development in the countryside must avoid reducing the open land that contributes to the form and character of existing settlements and maintains their separate identities but does this apply to areas which are not designated as "countryside" on the map, because it would appear that development around Alton and Holybourne, as well as surrounding areas such as Neatham, will constitute infill and therefore lead to the amalgamation of the town and surrounding settlements into one single entity.

(Developers) Gaps alongside Local Green Spaces risk becoming too much of a restriction to development. Need to bear in mind this should not be a backdoor to create 'Green Belt'.

One response strongly objected to the identified gap enclosing Lindford. This gap constrains opportunities in the Local Plan in a sustainable area from future expansion. Another objected to the Headley Down/Grayshott gap which should either be deleted or amend the boundary.

Policy too restrictive particularly in areas around Horndean, Clanfield and Catherington which are surrounded by the SDNP. It does not allow a landowner to put forward sites for development for local people. The gap at Drift Road/White Dirt Lane does not constitute coalescence, the distance is so minimal that you would not leave one place and move into another.

Rather than a Gap policy would suggest a policy that seeks the protection of settlements from coalescence. The policy as it stands is vague in terms of its aims, and as drafted is unclear how conflict with NBE1 would be avoided, which permits certain development within the countryside.

Question: Policy NBE12 Green and Blue Infrastructure - What are your comments on this policy?

(EA) The policy does not appear to address rivers.

(Natural England) welcomes the policy and inclusion of the GI Framework Urban Greening Factor Standard within the policy requirement. However suggest this is removed from point (a) and identified as a separate point. NE suggest further edits relating to paragraph 5.91. Further emphasis should be placed on how the GI Strategy links to the LNRS.

(SDNPA) Expand policy to encourage linkages between EHDC and SDNPA LPA areas.

(Surrey CC) support policy but definition should include reference to SUDS not just rivers, streams and wetlands (page 125).

(HCC) Recommend adding additional wording which ensures new landscape proposals function for climate resilience and health outcomes. Noted public rights of way network is not referenced as part of the GI network.

(Headley PC) support policy but requires more detail.

(Beech PC, Whitehill TC, Woodland Trust, HIWWT, Individual) Support policy.

(CPRE) Strong support but consider more attention to blue infrastructure is needed. Suggest edits to policy criterion g, h and i.

(CP) Overall the policy was supported but one response felt that the allocations have no regard to green and blue infrastructure. Another response suggested that Policy NBE12 should include practical examples and another raised concern regarding enforcing and monitoring the policy.

(Developers) Support need for GI Plan but query when a GI Plan is required which responds to NE's 15 GI Principles. It will depends whether it's for outline or reserve matters stage. Suggested amended text:

A Green Infrastructure Plan should be submitted as part of outline and full detailed planning applications, detailing how the development responds to NE.....

One response objects to the GI Strategy which highlights a new strategic semi-natural green space north of Alton. Policy NEB12.1 and Fig 5.4 as currently drafted is unsound and needs amending to remove a blanket designation. A further response felt this area was too general and does not consider the functional relationship to build up settlements which allow for urban expansion. Suggest an amendment to NBE12 as follows:

Ensure local needs can be meet, balancing both protection of the local landscape and housing needs.

Question: Policy NBE13 Protection of Natural Resources - What are your comments on this policy?

(EA) recommend a new policy specifically addressing groundwater and land contamination.

(HCC) Suggest reference made to the Hampshire Minerals and Waste Plan in the “Why we need this policy’ section.

(SDNPA) expand to include sensitive receptors beyond the EHDC LPA area.

(Portsmouth Water, Headley PC, Whitehill TC, Whitehill & Bordon CP, Individual) support policy.

(M&FMNP) agree with policy but suggest when deliberating SUDs drainage schemes, consider the use of boreholes in SPZ1/2 areas. Also recommend protection of dark skies in rural areas is included in this policy.

(CPRE) Support with recommendations as follows:

NBE13.1(c) should refer to all water resources not just groundwater.

NBE13.1(d) A summary of the objectives of relevant River Basin Management Plans to be included as supporting paragraph.

(Whitehill & Bordon CP) support policy.

(Common Place) Overall support for the policy but one response felt although the policy is vital some allocations will completely undermine the policy.

(Developers) Support policy provision for safeguarding mineral resources. However the PPG states that District Policy Maps should also show adopted Mineral Safeguarding and Mineral Consultation Areas, namely Horndean B wellsite and Holybourne terminal.

(Developers) One response supports NBE13 part e.

Question: Policy NBE14 Historic Environment - What are your comments on this policy?

(HCC) Page 136 recommend that historic public rights of way be added to the list under historic landscapes.

(Historic England) Although a strategic policy it begins with a development management focus. Suggested edits to NBE14.1. NBE14.2 offers greater protection to non-designated heritage assets than offered by NPPF. Repetition of text in NBE14.2c and NBE4.3c. Formatting on page 135 is confusing.

(Headley PC) support policy but needs policing.

(M&FMNP) Some ancient monuments are missing from the map Fig 5.5.

(CPRE, Whitehill & Bordon CP) strongly support the policy.

(PeCAN) There should be a presumption in favour of allowing sympathetic retrofitting measures to listed and heritage buildings.

(Common Place) It was considered that this was an important policy and the historic environment should not be subjected to destruction and change for the sake of fitting in a few more houses.

A few responses related to additional changes or edits to the draft policy. These are as follows:

NBE14.2b should be deleted.

NBE14.3b and words 'for a designated heritage asset' in NBE14.3a should be deleted.

NBE14 should include a definition of what is meant by 'substantial harm'.

14.1 should include a presumption in favour of sympathetically designed and installed retrofitting measures that will reduce the carbon footprint of listed and heritage buildings.

Some responses considered that a number of areas are historically important but not listed as such. For example, Alton, as a historic market town, should be classed as a heritage asset.

Although seen as an important policy, one response is concerned with the cost of providing a Heritage Statement.

(Developers) One developer response supports this policy.

Question: Chapter 5 Safeguarding our Natural and Built Environment – Please provide any further comments on this chapter

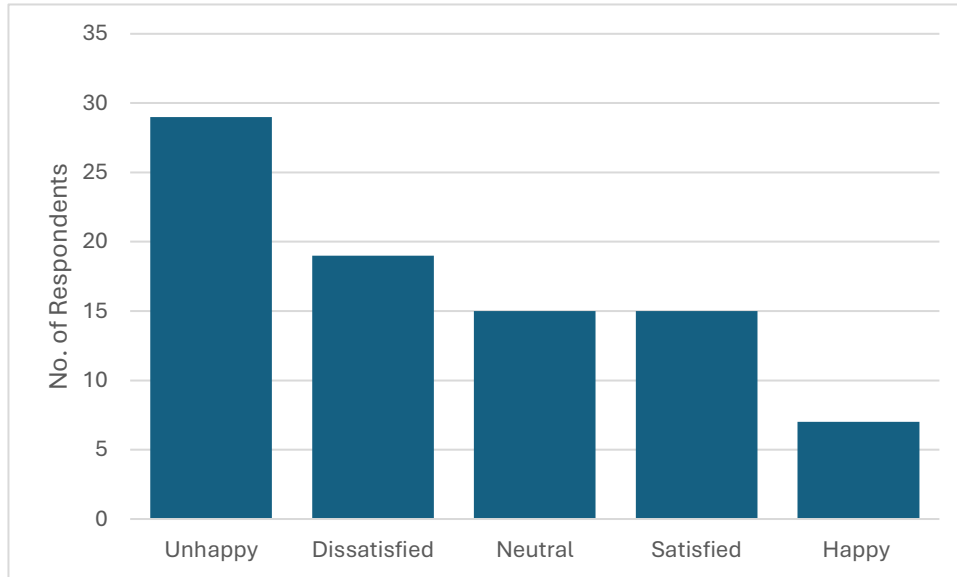
(CP) No Common Place comments were raised.

(EA) New policy to address chalk streams 'Protection and Enhancement of Watercourses' is required.

(SDNPA) NCIAAs (Natural Capital Investment Areas) should be referenced and mapped in Chapter 5.

Chapter 6 Creating Desirable Places

Question: Chapter 6 Creating Desirable Places – How do you feel about this chapter?



Question: Policy DES1 Well-Designed Places - What are your comments on this policy?

Many responses expressed support for the policy, either for the principle of seeking high-quality design from new developments or for specific policy criteria (e.g. support for recognising the importance of creating healthy and active places). Some respondents identified perceived weaknesses with recent development that should be addressed through future policy, including: the impacts of new development on local surface water drainage and flooding; insufficient pedestrian and cycling infrastructure; car dominance and a lack of parking; insufficient green infrastructure, including a lack of space for larger trees to grow to maturity. Some respondents raised concerns about the appearance of recent development in Whitehill & Bordon, such as a lack of variety in building design (cladding, roof design, material colours), as well as amenity/privacy issues that had arisen due to unsuitable window design. There was some concern that the draft policy had not effectively defined 'local character', and that this needed to be explained in terms of the Government's ten characteristics of well-designed places.

Some respondents highlighted issues that they felt were inadequately addressed through the policy. A recurring theme in this regard was the provision of adequate infrastructure particularly relating to the transport needs of new development. There was some support for the concept of 'living locally', with the suggestion that new sustainable transport infrastructure should be prioritised at the design stage. Hampshire County Council requested references to the cycling network and walking zones in the East Hampshire Local Cycling and Walking Infrastructure Plan. Additional policy or guidance was requested to ensure that suitable public transport connections would be provided, and that new, high-quality areas of open space would be provided and appropriately distributed in new developments. Historic England requested specific reference to conserving and enhancing the historic environment. National Gas Transmissions requested policy

recognition for existing on-site utility infrastructure constraints to be respected when designing new development.

Developers requested further clarity on the how to resolve tensions between the policy aspirations for tackling the climate emergency and for supporting or respecting local character. Some suggested that following the existing pattern of local development, or using traditional building materials, may not be optimal for creating climate resilient environments or for reducing greenhouse gas emissions. It was also suggested that the policy's proposed design process should focus more overtly on making the best use of land and on optimising the development capacity of new sites.

Several respondents perceived tensions between Policy DES1 and other policies and proposals of the Draft Local Plan. In particular, it was suggested that proposals for the development of land at Neatham Manor Farm (near Alton) and north of Haslemere Road (Liphook) would be incapable of meeting DES1.

Question: Policy DES2 Responding to Local Character - What are your comments on this policy?

Support was offered for the aspirations and intentions of this policy and/or its criteria. This was often expressed with caveats relating to the ability of the Council to achieve high quality development for all aspects of local character, particularly in the context of the perceived failings of recent development. Concern was raised about the appropriateness of the building designs at the former Coors Brewery site (in Alton) and in regeneration areas of Whitehill & Bordon. However, some respondents praised the redevelopment of Whitehill & Bordon as respecting local character (e.g. recognising the importance of the former military land use). There was a particular concern that recent out-of-character (higher density, sub-urban) development in Four Marks and Medstead was now being taken as characteristic, rather than the linear configuration of mostly detached houses on large plots with lots of mature trees.

Some responses criticised the policy for lacking ambition or vision, or that the policy forms part of a local plan that, overall (taking into account the proposed allocations) would be incapable of respecting local character. Some responses suggested that the policy should focus more on local history and architecture as a design influence, with Historic England suggesting that the policy should reference the importance of the historic environment so that the design of new development responds appropriately to local character. The South Downs National Park Authority suggested that the landscape character and features of the National Park could be referenced and that the policy could identify a need to avoid or minimise adverse impacts on National Park's setting. Some parish councils requested more recognition for local design guidance and evidence that has been prepared in support of neighbourhood plans.

Amendments were requested to criterion h) (the design of car parking) and criterion i) (the inclusion of contextually appropriate vegetation). Due to high levels of car dependency and a lack of transport alternatives, it was suggested that the sufficiency of off-street parking was an important consideration, whilst the inherent difficulties of making car parking infrastructure attractive was also noted. Responses noted the importance of street trees for visual amenity and climate resilience, but one response noted the potential impacts of new green infrastructure on the safety of streets for those walking and cycling, especially if it is not well-maintained. CPRE suggested that the wording of Policy DES2 and DES3 should be cross-checked for potential repetition.

Climate mitigation and adaptation featured in some responses, with suggestions that sustainable, energy-efficient building materials should be used and opportunities provided for renewable energy generation. One response suggested that this could mean departing from the existing local character of development. Other responses made clear that climate-responsive design was important, but that local vernacular (including building materials) and local landscapes were also important design considerations.

Some responses argued for a variety of building styles in new development, influenced by the incremental changes in character that happen over time across a settlement by virtue of changing architectural practices and conventions. Some developers argued for flexibility in the application of policy criteria to meet specific needs or allow schemes to form their own character and identity. However, there was concern from some respondents that the policy should be strengthened to ensure that new development reflected a Hampshire- or more locally specific sense of place.

Question: Policy DES3 Residential Density and Local Character - What are your comments on this policy?

Several representations expressed support for the overall objectives of the policy with some respondents considering that the character and context of an area should influence housing density and design. Some suggested that the local character of an area must be retained and maintained. There was some agreement that housing density must meet the criteria to enable the provision of green infrastructure in accordance with Policy CLIM5, the National Model Design Code Guidance and parish design codes.

Some respondents suggested that high density development should be encouraged on brownfield sites and in town centres/larger village locations to improve footfall and viability. Some comments identified the importance of health and well-being, provision of open space, adequate plot sizes and the need for adequate parking provision.

A small number of respondents expressed concerns that maximising housing density could lead to overdevelopment and detrimental impacts on the character and appearance of local areas. Issues regarding potential adverse impacts on existing infrastructure (e.g. surgeries, water, sewage systems) and highway networks were also highlighted as a significant concern. Several respondents identified concerns relating to housing density within the proposed site allocations in Alton, Liphook and Four Marks.

Hampshire County Council suggested that the mitigation of landscaping impacts should not rely on low-density development, rather high-quality design and well-designed planting. They also highlighted that maximising density and planning for higher densities will enable the viability of local facilities, public transport and active travel.

Developers generally support the principle of the policy, but some consider that the policy is not clearly worded and is ambiguous. Several responses requested a review of the wording of the policy. One developer response raises objection to the policy on the grounds that it is not consistent with the aims of the NPPF.

Question: Policy DES4 Design Codes - What are your comments on this policy?

Several respondents have offered support for the policy but there is some criticism that a Design Code has not yet been created. Some responses suggested the policy should include requirements for Swift bricks and artificial nest cups for House Martins.

Some responses expressed concern that a Design Code could restrict choice and questioned the need for a District wide Design Code. Some respondents expressed concern that the policy does not include the characteristics of 'context', 'nature', 'identity', 'public space' and 'use'. Some responses suggested that the policy is difficult to understand.

Some parish councils suggested that the provision of public transport measures and infrastructure should be implemented in the early stage of development as opposed to after completion of development. Neutral representations received recommended that the policy should include higher environmental standards, and that design and the wider housing styles should be more imaginative to create character. Other responses recommended the need for mandatory enclosed front porches to reduce energy loss.

Hampshire County Council raised concern that the draft policy excludes characteristics of national guidance such as the National Design Guide (Context, Identity, Uses, Public Spaces and Nature). Clarification is sought with regard to the design code and which development this would apply to and expected date of implementation. Historic England expressed support for the aspirations of the Council in recognising the underpinning role of the historic environment and would welcome discussion the Council about its plan for design coding.

One developer supports the policy and suggested that the Draft Plan should identify the conditions for each settlement size and housing allocation to ensure there is a consistent understanding of the requirements set out within each local area.

Question: Chapter 6 Creating Desirable Places – Please provide any further comments on this chapter

Some respondents support the aspirations of a Design Code and expressed that the policies will provide opportunities to create desirable places.

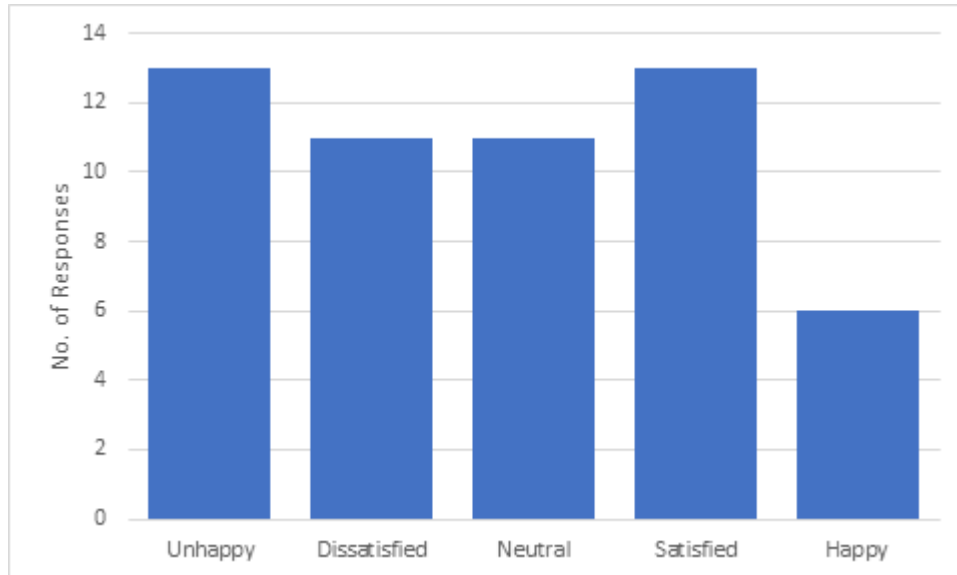
Some of the responses referenced specific areas in the Local Plan area (e.g Whitehill & Bordon and Alton) and highlighted concerns regarding inadequate modes of public transport and lack of infrastructure. Respondents also expressed dissatisfaction with the density of development and resultant adverse impacts on local character from recent new developments. It was expressed that there is a need for publicly accessible natural land with the increasing housing numbers.

A small number of responses expressed the need for bungalows for the older population. Some criticised plot and dwelling sizes and lack of cycle storage. A small proportion of respondents consider that the promotion of walking and cycling is unrealistic. Concern regarding the lack of housing numbers in the SDNPA also featured.

One response highlighted that the policies would result in significant costs to the developers who would have specialist staff to address the policies whereas the smaller companies who do not have specialist staff would be disadvantaged. One respondent questioned the ability to deliver given the cuts to the planning service.

Chapter 7 Enabling Communities to Live Well

Question: Chapter 7 Enabling Communities to Live Well – How do you feel about this chapter?



Question: Policy HWC1 Enabling Communities to Live Well - What are your comments on this policy?

Comments similar to above, stating the aspirations are undeliverable due to declining public transport, failure to provide health services locally. There are no measurable indicators of how this will be monitored, and a short chapter shows lack of commitment to these aims.

Also as above, comments noting the chapter is at odds with site allocations, particularly Neatham Down. On a similar theme, comments saying that building more houses on greenfield sites is not good for people's health; it is in fact stopping people living well due to more traffic, pollution, less green spaces, and more pressure on infrastructure. Proposing housing on the edge of settlements means people will need to travel more, and reduces direct access to the countryside for many people. The plan is a risk to living well.

Queries raised about whether there are any specific plans for youth activities, and then also asking what considerations there are for older people, such as accessible housing, and how carers are considered. Despite being an ageing population, the focus appears to be on young people. Suggestions that more sport and leisure facilities are needed in Alton.

With regards to Policy HWC.1.2 which requires developers of schemes with 50 homes, nothing is said of the content of these. There should be more information in this chapter on this to avoid it being a tick box exercise.

Re the comment in HWC1.1b, which discusses having attractive walking routes, there are many local walking routes that are in bad condition, and get very muddy e.g. Lymington Bottom Road, Boyneswood Road or Grosvenor Road in Medstead.

More thought and consideration needs to be given to the existing local residents who live through redevelopment and regeneration projects. This impacts on their day to day lives

and wellbeing. The example given is in Whitehill & Bordon. Then as the new housing comes, the infrastructure is very slow behind it, so there is increasing pressure on existing residents.

In response to Policy HWC1 paragraph 1.1, HCC suggests that applicants should be encouraged to utilise the Healthy Streets approach and Hampshire Movement and Place Framework, as set out in policy DM2 of LTP4. Additional policy criterion should reflect the wellbeing and recreational benefits and objectives of the public rights of way network and suggested amendments have been provided.

In order to strengthen policy and the monitoring framework, it is recommended that reference is made to the JSNA.

The ICB supports the completion of a HIA as detailed required in Policy HWC1.2 to ensure that developers have correctly assessed the capacity and quality of care available to support their developments.

The SDNPA suggest that the wording of Policy HWC1 (c) is expanded to enhance and facilitate the access to the SDNP (incl. Its active travel network, destinations, features and GI network).

Medstead & Four Marks Neighbourhood Plan Steering Group supports the aspiration Policy HWC1 and considers it forward facing, joining it with the Hampshire Integrated Care System (HICS). The NPSG welcomes the inclusion of a Health Impact Assessment (HIA) for larger sites as it will assist in the assessment of any application.

CPRE generally supports the thrust of the policy but notes that most of the criteria listed cannot be solely determined by planning policies and questions the provision for resident's Health and Wellbeing

Horndean Parish Council considers that criterion a) to d) are the holy grail of a local community and request that the criteria include access to clinical care. General comments include clarification on how major developments are defined and the safety of walking routes in rural areas in winter.

CPRE considers that the Policy HWC1 (b) should include a reference to mobility scooters and wheelchairs. Clarification is required on the type of mitigations measures envisaged. A query has been raised regarding the policy number referencing.

Headley Climate Action Network support the policy.

Home Builders Federation agrees HIA's for a development of 50 homes or more is an essential part of plan making, it is suggested that the preparation of a whole plan HIA will inform the Council that the policies address the key health outcomes for the area.

NHS Property Services welcomes and supports the inclusion of policies that support healthy lifestyles, and the requirement for Health Impact Assessments on significant residential developments of 500 units or more. They consider that the planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

PeCAN query the wording of the policy and consider that it overlaps with Policies DGC2 and DGC5. It is suggested that Policy HWC should be reduced such that it only requires developers to complete the Active Design Checklist and to prepare a Health Impact Assessment Health at an early stage in the planning process, while additional specific policy requirements about access to transport services, sports grounds etc are set out in

Policy DGC2 and DGC5. Clarification is required on the definition of 'blue corridors' and it is suggested that the requirement of HIA's should be made clearer to developers.

We Are Cycling UK agree with the policy, in particular point b.

Whitehill & Cordon Community Party are satisfied that a lot of good work is being done to ensure healthier living in East Hampshire. They suggest that further incentives to get people active like reduced subscription rates at fitness hubs and leisure centres would be welcome.

An Individual comment received expresses that green fields and open countryside spaces support wellbeing, not play areas within high density housing developments.

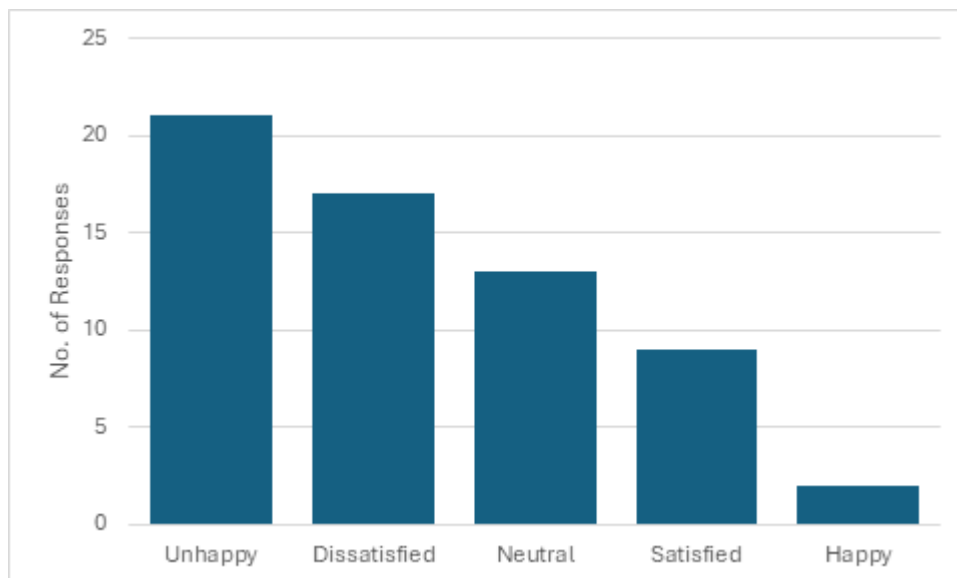
The content and methodology of a HIA should be made clearer to developers.

The site promoter for Chawton Park supports the principle of Policy HWC1 and expresses that Chawton Park will deliver a walkable neighbourhood which is readily connected to key cycle and active travel routes.

Representations received on behalf of an interested party for land at Station Road, Bentley express that the proposal for the development of the site 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.

Chapter 8 Delivering Green Connections

Question: Chapter 8 Delivering Green Connections – How do you feel about this chapter?



Question: Policy DGC1 Infrastructure - What are your comments on this policy?

Some supportive comments, and for the use of Grampian conditions. Support also expressed for the use of CIL to fund infrastructure, and consideration of cross boundary impacts. General support for the requirement for infrastructure to be provided at time of

need. Infrastructure implications should consider the wider area as well as the site specifics. National Highways support the inclusion of Policy DGC1 'Infrastructure' which effectively prevents development from occurring until necessary infrastructure is available.

Concerns that the intentions of this chapter are not deliverable, particularly given a lot of elements are outside of the Council's control. Some respondents felt it is a pretence to say otherwise, and that there are a lot of nice words but they don't reflect the reality on the ground, particularly in rural areas. Also that a lot of political will is needed to support these ambitions, and that there needs to be recognition that it will take a long time to achieve sustainable transport.

The chapter does not comply with site allocations proposed – particularly at Neatham Down where 1000 homes are proposed without sufficient supporting infrastructure. Also that there's conflict between parts of the plan which consider environmental aspects and housing.

With regards to infrastructure at Neatham Down, a comment that successful Strategic Sites tend to be locations with good pre-existing road and rail infrastructure – and that many new communities fail. This is the likely fate for Neatham Down, and the proposal to create a CIL island is telling, that the Council believes all CIL generated must be used to fund basic infrastructure (school, village greenspace, etc) in order to mitigate the site's non-existent existing infrastructure.

Many comments stating that infrastructure should be provided (and staffed) before the housing is occupied.

Some locally specific comments relating to Bordon, Alton and Selborne, namely that infrastructure is lagging behind in Bordon which also impacts on other surrounding areas, and that Alton doesn't have sufficient infrastructure to support the housing growth planned and significant upgrades are needed. Consideration must be given to providing Alton with the capability to sufficiently bolster its infrastructure in advance of committing to further housing development, so as to allow it to cope with such further growth over a sustained period.

Some suggestions; new infrastructure should be designed to not be car dependant, a clean green public transport system is needed in East Hampshire, and more zebra crossing in Alton. One comment saying there needs to be some positive ideas about how to make the infrastructure ready for the future - drainage, roads, rail and cycle access. Sites for wind and solar generation, battery storage and charging facilities for school buses and delivery vans. Also a vision to connect North East Hampshire with the South Downs National Park (there are two major long distance paths and featured in many walking guides following the Pilgrims and St Swythuns Ways. There needs to be a better rural connection from Ropley and Four Marks to Chawton and then South to Selborne (Gilbert White). The cycling and horse riding communities are excluded by not have bridleway connectivity between this golden triangle of tourist attractions).

Some general comments saying the chapter has no real vision, and doesn't propose any improvements to infrastructure. There is no infrastructure plan to support the Local Plan, and nothing to say how infrastructure will be paid for. Policy DGC1 and Appendix H do not identify infrastructure improvements that are critically needed and therefore is not fit for purpose.

It appears that unless an area is designated for development, there are no plans to improve its existing shortcomings. This is not a sound approach. The Local Plan should actively identify where new or extended medical facilities should be, just as it should the same for schools. It needs to allocate either new land or existing sites for intensification or

expansion simply to meet the growth that has already taken place, and which has not been successfully planned for or provided.

Query from the ICB whether the monitoring table includes S106?

Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. It should be clarified that the NHS and its partners will need to work with the council in the formulation of appropriate mitigation measures.

Some specific comments on parts of the policy;

- DGC1.1 is vital to ensure that provision is made when first needed / The policy doesn't address development in advance of infrastructure – this mustn't be allowed to happen
- Re DGC1.1. This must not be compromised in small villages in an attempt to provide housing
- Re DGC1.6. There needs to be more scrutiny of infrastructure providers, e.g. Water companies
- Very sensible policy but the key issue is that it appears to be only enforceable where it can be demonstrated that development will make services worse and not due to the increased requirement for services.
- Should be a stronger statement as to what improved infrastructure is required to support each specific development, and developers should be held to account to deliver these improvements in a timely manor
- HCC - Infrastructure for sustainable transport should be available from first occupation to ensure that sustainable travel behaviours can be embedded, and use of the private car is not the only option for residents who occupy the site during the early phases of development. Suggest policy wording is strengthened to clarify that this means, in most cases, at first occupation. Policy DGC1 should include public rights of way infrastructure to ensure suitable obligations to mitigate and compensate development impacts on the network are sought, and that provision is made for local and regional public green spaces for countryside access, wellbeing, and recreation. Para 8.10 recommended text: 8.10 Infrastructure is a very broad term including roads and other transport facilities, public rights of way, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, open spaces, and public green spaces. Emerging Infrastructure Delivery Plan should include the public rights of way network and public countryside sites such as parks, country parks, heritage sites, and other accessible green spaces.
- HCC - 1.2 states that proposals must consider all the infrastructure implications of a scheme, not just those on the site or its immediate vicinity. A significant proportion of visitors to the Queen Elizabeth Country Park come from within the East Hampshire District. The County Council has identified proposed Local Plan site allocations that are within the visitor distance of Staunton Country Park and Queen Elizabeth County Park. Increased housing development within the visitor catchment is likely to increase demand for these facilities and the associated cumulative impacts will need mitigating. To fund necessary infrastructure improvements at these country parks (as identified in the forward plans), developer contributions which meet the regulatory tests may be sought where this is supported by evidence of visitor numbers and pressure.
- HBF Part 1.2 of this policy requires development proposals to consider all the infrastructure implications of a scheme not just those on site or its immediate vicinity. This is general statements masks the fact that the implementation of this policy could go beyond the requirements of what a planning authority can consider with regard to some infrastructure when making land use planning decisions. This

concern is confirmed in paragraph 8.18 which states that developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both onsite off site to site to serve the development. The HBF do not consider this to be necessary as the capacity of the sewage network are not a land use planning matter for consideration on an application by application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Consequently, it is inappropriate to include a policy in the local plan requiring a housebuilder, or other applicants for development, to assess the capacity or otherwise of the water company to provide water supply and wastewater connections as they are an attempt to get applicants to do things for which they are not legally responsible. This policy must be clear that for services where there is a statutory requirement for the provision of these services then this is not a matter for the decisionmaker at the point of application. (note similar is said by Thakeham)

- Pecan - Paragraph 108 of the NPPF (Dec-2023) Section 108 recognises this need to consider transport issues at an early stage, but this need is not mentioned in Policy HWC, DGC1 or DGC2. If it is not covered elsewhere within this local plan, then a policy on this topic should be added.

Bloor Homes

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.~~

Question: Policy DGC2 Sustainable Transport - What are your comments on this policy?

A number of supportive comments were received specifically supporting the principles and aims of the policy. Support was noted from neighbouring local planning authorities as well as National Highways. However, a lot of comments placed scepticism on whether the policy would actually deliver results and the reality of residents actually being able to live locally by majority of travel being undertaken by walking and cycling.

Concern was shared over the realism of cycling and walking in association with new developments, with the main concerns being:

- Existing cycleways and footpaths are stated to be very narrow (sometimes due to overgrown hedgerows), on main country roads and shared with pedestrians – resulting in an unsafe cycling and walking environment.
- Cycling is predominantly undertaken for leisure and not realistic for other purposes such as journey to work, particularly as it is expected a large proportions of residents have workplaces far away.
- Does not suit all members of the community i.e. suits young and athletic but not the elderly.
- As only likely for 10 minute journeys, doesn't relate to many journeys as everything is more than 10 minutes away.
- Cycle routes and footpaths currently fragmented and incomplete causing a use of narrow roads.

Due to the policies focus on cycling and walking responses raised the importance of the LCWIP and how this will form an integral part of the Local Plan. Consequently, it was suggested that the LCWIP is integrated in the Local Plan. It was noted that slow progress had been made with implementing cycling and walking infrastructure from the LCWIP.

The living locally concept attracted some unsupportive comments. It is thought that living locally cannot occur in East Hampshire due to the main issue of all key infrastructure (schools, hospitals, shops, leisure) is relatively dispersed, and thus there are relatively few genuine opportunities to travel by sustainable modes for multiple journey purposes.

It was also felt that the policy was placing too much emphasis on the legacy left from Covid/lockdown, that caused an increase in working from home. However, it is felt that the trend of working from home is diminishing with employers expecting their workforce to attend the workplace in person with greater frequency.

Many comments emphasised the need for improvements to be made to the public transport provision in the district before any thought could be given to the policy itself. It was expressed multiple times that the aims of the policy cannot be achieved without a reliable and well connected public transport system first being put in place. Specific comments relating to public transport improvements were:

- Bus services need investing in so there is a more frequent service especially before 9 am and after 4 pm for people to get to and from work and education.
- The bus routes are endlessly being changed and therefore cannot be relied on
- Without a reliable clean green public transport system residents of East Hampshire will not be able to reach the infrastructure whether that be places of work, shops and leisure facilities.
- Bus networks and safe cycle networks need to connect to railway stations and to larger towns.
- This policy also addresses the unique needs and challenges associated with subsidised transport, dial-a-ride services, and rural buses both in terms of funding and accessibility of the service.
- Scheduling is key to public transport success - timings for journeys to/from schools, start and end of working days etc.
- A reliable public transport network would save greatly on carbon emissions.
- Towns should have dependable, frequent and affordable bus services to the surrounding parishes. Towns like Petersfield, Alton and Whitehill would operate more as mini-transport hubs that provide greater access to local concentrations of critical services.
- Outside Tier 1 and 2 settlements, these public transport is almost non-existent – how do you improve on something that doesn't exist to begin with.

- Long-term investment into sustainable public transport is required to link rural communities and the hub towns and cities such as Southampton, Winchester, Guildford, Portsmouth, Alton and Basingstoke.
- Alton/Holybourne already need a more regular bus service to enable non-car access to leisure centre, town centre, station, Farnham.
- Example of EHDCs poor public transport - between Petersfield/Liss and Alton there is single direct bus route (38) which only runs Monday to Friday, daytimes only, with two hour gaps.
- Future housing should be built in locations where there is access to regular public transport.
- There is no excuse for not using the railway lines that have been provided to East Hampshire. Rowlands Castle, Petersfield, Liss, Liphook, Alton and Bentley all have stations along these railway lines.

Consequently a number of responses stated that it is highly unlikely for living locally to occur in rural East Hampshire, but instead for travel by the private car to remain dominant. Some mentioned praise for the policy in that it recognised the remaining need for the private car, whilst others thought the policy was unrealistic and redundant due to the existing poor public transport choices and resulting heavy reliance on the private car. Carrying loads of shopping was another point raised as to why the car will remain the favoured mode, as it is convenient to transporting items whether that be shopping or supplies. Suggestions for car-pooling were put forward as a potential solution for a rural district such as East Hampshire.

Many alternative suggestions/interventions were shared for inclusion in the sustainable transport policy:

- Electrification of the road.
- A driverless electric commuter train to Alton with associated hop-on trams.
- Reducing free on-street car parking in town centres to discourage the use of the private car and freeing up space for sustainable travel infrastructure.
- Invest in cycling and walking to make it a safe mode of transport whilst also inevitably inconveniencing car drivers.
- A fully segregated cycle route parallel to the A31.
- Parish Councils to establish car lift schemes – reward scheme for those that witch to car lift scheme for at least one journey a week.
- Install delivery dropboxes.
- Promote green supermarket deliveries.
- Promote oil delivery clubs.
- Put an electric bike for hire in each village on a rotation scheme for a month, during the late Spring to early Autumn.
- Cycle routes need to connect to rail stations.
- Allow only buses/disabled vehicles/taxis into the town centre between 9-4pm to improve air quality.
- Make the middle section of Alton High Street buses only, as it was originally designed to be.
- The policy needs to reflect the poor state of roads between the major towns in East Hampshire, and that the main routes are A31 and A3 which cut across the District, not linking major towns.
- Double parking charges for SUVs in town centre car parks - these vehicles must be discouraged from driving into the town centre because of the pollution & poor air quality they cause.
- Local buses serving new developments on a couple of "loop" routes which also link to medical facilities and the town centre.

- A taxation on cyclists to pay for their infrastructure.
- Strategically placed drop off/pick up zones for education settings to discourage use of the car.

A number of comments did recognise the difference in power between East Hampshire and HCC (the highway authority) for transport matters. It was expressed that there was no point in East Hampshire adopting this policy as HCC are in control of transport in the district, and should consequentially be leading on the policy and infrastructure requirements.

Specific suggestions to amend wordings of the policy were stated. Also reference in supporting text and the policy should be made to relevant sections of the NPPF, HCCs LTP4, Manual for Streets, Local Transport Note 1/20 and Active Travel England.

Question: Policy DGC3 New and Improved Community Facilities - What are your comments on this policy?

Some supportive comments, expressing the importance of community facilities – but with acknowledgements that some facilities are being closed, funding opportunities are reduced and many areas have experience new homes but not new community facilities. One comment saying support making existing facilities sustainable first. The policy corresponds with the ICB model of care where existing facilities are expanded to meet new demand is the preferred way forward.

Comments saying the policy is undeliverable. Proposals don't get delivered and many aspects are outside of the control of the Council. The museum is closing, and experience shows promises are broken and projects not delivered. The infrastructure planned for Boron has not yet been delivered.

Developers must be strongly encouraged to engage early with residents' representatives to understand community needs and provide reasonable solutions.

This policy leaves the door wide open for facilities to be closed and switched to residential development.

Suggestions that enhanced green spaces are needed, a sports and leisure facility with a swimming pool is needed in the southern parishes and theatre space in Alton. All community facilities should have covered bike parking available. There should be safe access to this for cycles, and separate footpaths to all community facilities. To access Chawton Park Surgery for example, there are places where you have to walk in the road, and the bicycle parking is sub-standard.

With regards to Page 196: DGC3, could there be some consideration here on forging links to such facilities that are in adjoining jurisdictions.

Infrastructure should be in place before housing is delivered.

Query how this will be funded.

There is a huge need to modernise and make better provision for larger villages.

Four Marks has had the same facilities for years despite many more homes. There is an opportunity to provide new community facilities in Four Marks by including the site to the rear of 87 Lymington Bottom, Four Marks as an allocated site. The sports facilities in Four Marks reflect the older population. The Parish Council focus on traditional sports and our equestrian sports are neglected. Walking is popular and many have tried to cycle the country lanes. Fitness and mental wellbeing would be much improved if there were safe

places to ride (on an electric bike or a horse) and the widening of existing paths and removal or opening up of kissing gates is all that is required.

PeCAN recommends that encouragement is given to the following types of planning proposals:

- Plans that re-vitalise town centres, neighbourhood centres and local villages, to encourage residents to live locally, where the development complies with other relevant policies in this local plan.
- Investment in walking, cycling, integrated public transport and new forms of shared mobility such as electric bikes and electric car clubs, to make local trips easier and reduce the need for private car ownership, where the development complies with other relevant policies in this local plan.

Repetition between sections. In some cases, such as DGC3, DGC4 and DGC5, which cover new and existing community and sports facilities, the policies are very similar and could potentially be combined. In others, such as NBE2.1c and NB3, exactly the same policy principle (Biodiversity Net Gain) is presented. We do not, of course, disagree with the desired policy outcome but do question the need to require it twice.

Question: Policy DGC4 Protection of Community Facilities - What are your comments on this policy?

Some supportive comments, stating that community facilities should be protected. Comment noting that the countryside is a value community facility and should be protected too.

Suggestions include that there needs to be more emphasis on the protection of open spaces within the urban areas - so that we don't have to get in our cars and driver to and park in the countryside to be able to enjoy outdoor space. As the larger settlements get bigger the mitigating effect of nearby countryside is being lost and higher levels of provision of open space/greenspace within the built up limits is more important. Also that Allen Gallery/Museum/Assembly rooms could be adapted to accommodate a small cinema (like Living Room, Liphook) and the revenue help to fund the facility.

Comments that the policy is undeliverable, the museum is being closed, the Council is looking to reduce costs, and many aspects are outside of the control of the Council.

With regards to the specifics of the policy, comment that the policy appears to have been constructed on the basis that all open space, sport and recreation facilities are interchangeable, i.e. that a change from one specific land use to another within this overall category is automatically acceptable. This is not the case as a change may result in an existing need ceasing to be met. Similar comments apply in relation to community facilities. The policy should be reworded to make clear that the particular nature of and need for the facility in question will be taken into account. Also, DGC3 is at variance with current and past practice.

Community facilities should specifically include shops and public houses. Open countryside is a community facility and should be protected from development.

With regards to the proposed site allocation at Neatham Down, the CIL island will deprive Binsted Parish of any CIL funding from the new development, which is unacceptable. Binsted Parish would require a source of funding to adjust its community facilities to

accommodate such a huge increase in the local population. The proposal to build a new primary school at Neatham Down could have a negative effect on the future viability of Binsted's one-class-intake primary school.

The provision of community facilities has not kept pace with the growing population. There is very little open space left in Alton as it has been built on. The Local Plan identifies an extension to Chawton Park Surgery in Alton but gives very little information on the detail of how this will be achieved, particularly how it will be staffed. The Butts School in Alton has already been extended onto its playing field, and now plans are proposed to extend it again. More building on the playing field will restrict sporting activities.

HCC - Policy DGC4 has important implications for the rationalisation of the County Council's estate. This may sometimes result in the 'necessary loss' of particular community facilities (such as libraries) in County Council ownership, in order to reinvest proceeds of sale in local service improvements. The County Council's service improvement programmes have strict timeframes and budget funding. A mandatory 12-month marketing exercise would cause additional delay and costs which could directly impact on the delivery of the public services. Request that the emerging Policy DGC4 is amended to include sufficient flexibility to accommodate the unique role and function of public service providers and their need for managed change.

Suggest amendments to the draft policy wording: If either of the criteria are satisfied... 'only permitted if: it is no longer needed, and alternatives are easily accessible without causing unreasonable reduction or shortfall in the local service provision; and or it can be demonstrated through a rigorous marketing exercise that: i) the use is no longer viable, and ii) all reasonable efforts have been made to retain it, and there is no alternative viable use of the land or facility as a community facility Details of the marketing requirements are set out in Appendix D.'

NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be positively prepared or effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community. Proposed modifications - **Where healthcare facilities are declared surplus or identified as part of an estates strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure and facilities, there will be no requirement to retain any part of the site in an alternative community use.**

Question: Policy DGC5 Provision and Enhancement of Open Space, Sport and Recreation - What are your comments on this policy?

Supportive comments received with regards to this policy. Some areas are well served but would benefit from more as population increases. Urge the Council to support existing and future community sports and recreation projects and spaces.

Comments that the policy is undeliverable, as aspects outside of the control of the Council, and many areas have experienced new housing but not supporting infrastructure.

Some specific suggestions;

- should take advantage of the ability to put in larger, multi-purpose facilities to provide a "hub" where possible rather than lots of small facilities which may struggle with numbers for sustainability,
- a natural playground in woods in Alton,
- facilities should be ringfenced for use by East Hampshire residents to prevent block booking by sports clubs outside of the district,
- some woodland paths get very wet – try and keep better paths dry so people can get out and walk,
- need a local sports facility in Liphook,
- more grass sports provision
- In Four Marks, fitness and mental wellbeing would be much improved if there were safe places to ride (on an electric bike or a horse) and the widening of existing paths and removal or opening up of kissing gates
- Selborne recreation ground - for improved facilities, such as an outdoor gym, wildlife garden and facilities for a greater range of ages
- when designing for sport and recreation leave some green and blue space as unstructured space so that kids can run free and people feel welcome to rest a while - not just to do structured exercise.

Many venues are becoming over subscribed and more sites are needed for community use. There is a growing demand for recreational open spaces in all areas, but this is never included in any housing development plan. At best, small areas are assigned to grass with a few trees, or maybe include a small play area for very young children, but they are never usable as games areas or for informal or formal sports. We should be encouraging children outside to play and exercise, but this is never prioritised. More green areas would also break up the monotony of endless new-build residential housing, which makes villages and towns lack charm and character. We should be ambitious in including new playing fields for football, rugby etc, plus tennis courts or netball courts, along with allotments.

Open space does not have to be manicured it can be natural and wild. New developments need to include open space that is practical and usable.

There is an opportunity to provide new public open space in Four Marks by including the site to the rear of 87 Lymington Bottom, Four Marks, GU34 5AH as an allocated site.

It's a contradiction building on green open space, then re-providing some and saying it's new.

With specific regard to the policy,

- The penultimate paragraph in Policy DGC5.1 mentions 'the green network', but this term is not defined, nor can it be found in the Glossary. Similarly, the term 'place making' is not understood. These terms should be clarified.
- Community sports events can generate a significant number of vehicle movements and can also create parking congestion. Hence we strongly support the first part of the last paragraph of Policy DGC5 (New provision should also protect, enhance..). However the last part of this paragraph seeks to protect access to the wider countryside from potential damage from the creation of new public open space. PeCAN suggests that this protection be widened such that access to the wider countryside is protected from all forms of development. A clause such as the following should be added to DGC2: 'Development proposals will be encouraged where they maintain or enhance established walking or cycling links to the wider

countryside from towns and villages and which meet the needs of communities both within and beyond the site's boundaries'.

Question: Chapter 8 Delivering Green Connections – Please provide any further comments on this chapter

Encouraged by the scope and commitment to greener policies, but incentives will be needed to create cultural change from car to sustainable travel.

Again, comments about delivery of this chapter and its policies. How will it be enforced? It is outside of the control of the Council to deliver. Without an infrastructure plan – it is a wish list. Not green connections – just cars as far as the eye can see. Building on sites on the edge of villages and towns just increases car use – building on small brownfield infill will have more chance of increasing walking and cycling. The policies just don't stand up to scrutiny.

A specific concern that planning rules would make it difficult to use CIL money on sustainable travel infrastructure and that CIL money is unlikely to be sufficient to develop good quality walking and cycling infrastructure and that therefore car use will only increase in Tier 1 and 2 areas leading to increased congestion, poorer air quality and potential increases in CO2 emissions due to longer journey times in these areas.

It was stated that transport connections are needed as well as green connections. Cannot get to everywhere need to be just on green connections so roads need to be considered too. Also though, a comment that there is no plan for improving cycle routes or footpaths away from busy traffic in Alton and the surrounding villages. This lack of safe and pleasant routes for pedestrians and cyclists only exacerbates use of cars for short journeys. There needs to be a big shift towards driving this forward both for climate emergency reasons, but also to improve the lived experience of residents. In Four Marks, speed reduction and road safety need to be given top priority in the infrastructure plan.

With regards to the specifics of policy;

- The title of this section is misleading "Delivering Green Connections" when most of it is talking about delivering infrastructure.
- In the monitoring table, the target for Policy DGC2 about sustainable transport, says "No of developments permitted within the upper tier settlements". It is not clear what this means. Is it just Tier 1 and 2 or does it include Tier 3 as well?
- It is not clear how the monitoring targets for sustainable transport actually help towards the target of reducing CO2 emissions from transport.
- Footpaths are not discussed in any meaningful way in Chapter 8. The word "footpath" only occurs once.
- Support Policy DGC1 bullet point DGC1.1 and DGC1.2
- The mechanism as suggested by 8.18 through 8.22 is the planning process and the CIL, however, this requires that this process is incentivised not by hitting housing numbers only, which is how it feels currently, but by some other measure. Success is also if we get no flooding, major traffic jams, sewerage overflows, children do not need to travel long distances for school places etc.

The whole of Woolmer Forest, Bordon is common land. Under War Office occupation it required a certain amount of care for the woods and drains. If no longer needed by them it must be returned to the Crown Estate in good condition as per the Crichel Down Rules.

In Four Marks, the Parish Council went completely down the wrong track because they did not own the land that the Four Marks village hall was located on. Four Marks village hall just needed modernising.

Horndean, Lovedean and Catherington are not served by busses – there are not sustainable travel networks or public transport.

The District Council needs to work closely with neighbouring councils on infrastructure.

PeCAN

This text is based in part on the content of a document by Active Travel England called Standing Advice Note: Active travel and sustainable development which was published in 2023. These statements are phrased as policy statements and their inclusion is recommended. PeCAN suggests that inserting these bullets as a policy statement will give clear direction to developers to ensure that their development delivers sustainable and local travel.

At an early stage in the planning process, the matters discussed in the following should be given full consideration.

Opportunities for safe, step-free, fully accessible walking and cycling site access points must be maximised, and these should exceed the number of access points provided solely for motor vehicles (except where additional accesses would provide no benefit to people walking, wheeling and cycling).

Within a site, routes for walking, wheeling and cycling should be shorter and more direct than the equivalent by car.

Proposals should not prejudice the connectivity of existing and future development.

NPPF (Dec-23) Paragraph 116 suggests that transport infrastructure for developments should give priority first to pedestrian and cycle movements, both within the scheme and within neighbouring areas. However, LPT4 Page 64 appears to suggest that such a statement is too adversarial, instead Policy C3 asks that appropriate consideration is given to the items in an ordered list of issues and modes, which is illustrated using the diagram borrowed from LPT4 that appears on Page 189. PeCAN recommends that an additional policy statement that is consistent with LPT4 Policy C3 is added to either Policy HWC or DGC2.

The diagram on Page 189 was taken from Page 57 of HCC's LTP4 where an explanation of the diagram can be found. As this explanation is missing from this draft Local Plan, the purpose of this diagram is not clear. PeCAN recommends that the explanatory text from LPT4 is added near the diagram and that a reference to the diagram is added within the relevant text to emphasise that full consideration should be given to vulnerable users, people who walk, people who cycle etc, in the order of priority illustrated by this diagram.

Page 194 shows a photograph of four people cycling along a muddy track.

While it is useful to have a photograph to highlight active travel, this photograph may unintentionally convey the wrong message in that it might be construed as suggest that unsurfaced cycle ways are acceptable for off-road cycle tracks. This is not the case. Unsurfaced cycle tracks pose a skid risk (source LTN 1/20, TG10). Unsurfaced tracks may be suitable for routes used by recreational cyclists on mountain bikes but they are not suitable for utility journeys of the type that this document is trying to encourage, especially for risk averse and less experienced cycle users. It is recommended that this photograph is replaced.

Table 8.1. This table proposes that the desired switch to more sustainable forms of transport is measured by analysing planning applications. PeCAN recommends that this key source of carbon emissions is monitored by directly counting trips for various modes (vehicles, pedestrians, cycling). EHDC should work with HCC to increase the number of permanent automatic cycling, walking and vehicle counters that are currently in operation in East Hampshire. Note that HCC gathers school travel data which is relevant, as is data on bus and train passenger numbers.

Omission site

There is an opportunity to significantly improve sustainable transport provision in Four Marks and deliver new green connections by including the site to the rear of 87 Lymington Bottom, Four Marks, GU34 5AH as an allocated site in the final version of the Local Plan.

Allocating the proposed site to the rear of 87 Lymington Bottom would allow a pedestrian link between footpaths 16 and 17a, and also between the local primary school and the village.

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

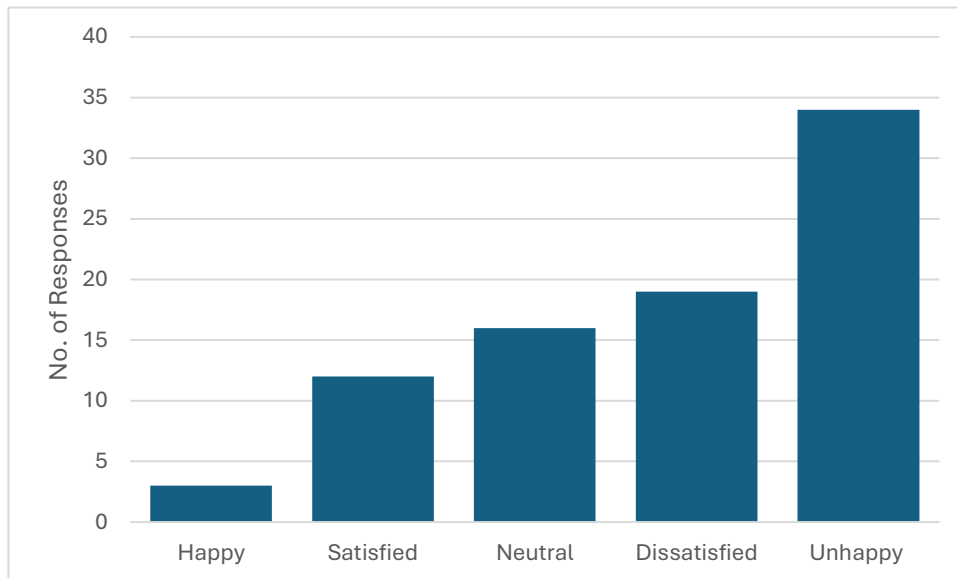
Combined with the LAA Ref FM-015 site, the proposed site provides an opportunity to significantly improve sustainable transport provision in Four Marks.

The proposed site would help to achieve prioritisation of sustainable modes of transport, including active travel (walking and cycling). In addition, the proposed improved connectivity will deliver green connections and reduce the need for transport by car and therefore reduce carbon emissions.

The proposed site and the opportunity to significantly improve sustainable transport provision is described in a supporting document that has been e mailed to localplan@easthants.gov.uk, including an overlay demonstrating the position of the proposed site and the LAA Ref FM-015 site showing how the proposed connectivity would allow a pedestrian link between footpaths 16 and 17a.

Chapter 9 Homes for All

Question: Chapter 9 Homes for All – How do you feel about this chapter?



Question: Policy H1 Housing Strategy - What are your comments on this policy?

There were many comments in direct response to Policy H1, but also relevant comments associated with Policy S1: Spatial Strategy, Policy S2: Settlement Hierarchy; as well as on specific settlements and sites.

Many comments expressed concerns that a disproportionate amount of growth was being proposed in Alton, which could undermine the emerging neighbourhood plan; and that a more balanced distribution to development across the district should be implemented. Some questioned why further growth was not identified in other settlements such as Whitehill & Bordon, and Liphook. However, there were also comments of support for the amount of growth in Alton, acknowledging that there are more facilities and services when compared to other settlements. It was widely acknowledged that lower tier settlements were less appropriate for high levels of growth.

There were general concerns associated with lack of infrastructure to accommodate the housing numbers, particular in regard to schools, doctors and traffic.

In terms of housing numbers, many public responses did not think it was appropriate or fair for the local planning authority to address unmet needs associated with the National Park and questioned the use of the standard method in East Hampshire. Many considered more development should take place within the National Park to reduce the burden on those areas outside. Many public responses also did not consider it was appropriate to apply a buffer to housing numbers as it would deliver homes above what is needed.

There was considerable support for the use of brownfield development, but some considered more brownfield sites should be identified instead of greenfield and policy wording strengthened.

Statutory Consultees (and Parish Councils)

Not many statutory consultees specifically commented on the housing numbers or housing strategy associated with Policy H1. Instead, most comments related to specific sites and/or settlements.

Neighbouring authorities welcomed the proposals to allocate more homes than required as a contingency against under-delivery and to meet any potential unmet needs. Portsmouth City Council acknowledge the expected surplus supply of 643 dwellings and note there is an unmet need of 4,377 homes in the City.

Most town and parish councils supported the housing strategy and that more housing was directed to larger, more sustainable settlements. However, some (as well as some campaign groups) raised concerns about the additional buffer, which was considered unnecessary. Alton Town Council did not approve of the amount of growth attributed to the settlement, but in contrast, Whitehill Town Council supported the approach, noting the number of facilities and infrastructure within the town.

Site Promoters/developers

From those promoting sites there was an overall consensus that the housing strategy did not identify enough homes to meet the needs of East Hampshire and alternative sites were proposed. It was acknowledged that the numbers associated with the standard method are an absolute minimum and that need between 2021-23 had been calculated incorrectly. There were also suggestions that the housing requirement should be increased to account for further unmet needs in the National Park, which has been underestimated, as well as unmet need associated with the South Hampshire sub-region. In regard to the latter, many stated that the housing strategy should identify a quantum associated with the unmet need. Some also commented that additional growth was needed in order to meet the significant need for affordable housing.

In terms of the difference between housing need and allocations, it was proposed that further housing should be allocated to provide a sufficient buffer should sites not be delivered over the plan period. Most advocated that this should be in the range between 10-15% and any buffer should be separate to the homes needed to meet potential unmet needs. There were also concerns regarding the windfall allowance and the reliance on the Alton Neighbourhood plan.

Whilst there was general advocacy to the tiers associated with the housing strategy, some promoting sites considered more housing was needed in the lower order settlements.

Overall, the development industry considered more housing was needed for the Local plan to be found sound at examination and many further sites, not currently proposed as draft allocations were encouraged.

Question: Policy H2 Housing Mix and Type - What are your comments on this policy?

Some generally supportive comments, particularly focussing on the need for smaller dwellings. A lot of comments received about small homes.

A comment about making sure small homes remain, saying PD rights should be withdrawn.

The policy should include a target for the percentage of new homes that are 1-2 bedroom homes / Recommend that a policy statement as to the minimum percentage of smaller

homes that would be required on any development of more than 5 houses. Based on the evidence provided by the HEDNA, recommend that this figure should be at least 75%. To ensure the robust implementation of this policy, recommend that the wording should include a requirement for at least 50% of all new homes on developments of 10 or more dwellings to have 3-bedrooms or fewer.

The proposed level of smaller homes should be subject to evidence indicating that, where there is a local need for an alternative housing mix, there should be flexibility in applying the polic

Developers need some financial incentivisation to build smaller dwellings, perhaps by reducing S106 and CIL payments required.

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. 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...'

EHDC should robustly enforce site configurations in accordance with actual need as set out in the HEDNA.

Comment that it is further recommended that there is a specific definition of 'smaller homes'.

Many comments saying need fewer 4/5 bed homes, 'executive' style homes. Some comments saying the mix needs to better reflect the type of housing people would like to downsize to (as such a change is needed from tall townhouses and flats, at high density).

The mix isn't a true mix and doesn't sufficiently cater for older people except with M&Stone type developments.

Need housing that attracts younger people

With regards to type/design, the Big modern developments do not give people choice and variety. They might be slightly different sizes and shapes but if you don't like that style it's getting harder and harder to find anything different. Not in favour of all the houses being the same style or type. Propose modern architecture. Houses should be fit for the 21st century and being carbon neutral, inexpensive to run, spacious enough, with sufficient storage and with good outdoor space, all essential for mental health.

Focus should be on brownfield sites

Some comments regarding affordable housing, noting that more is needed and that it needs to be truly affordable. It seems to be a low amount of affordable to be provided when considering what needed. There should also be rental properties plus variety of other ownership/financing models for younger/growing families. A comment that affordable housing shouldn't be mixed in with market housing. A proportion of older people will need affordable housing.

A few comments about density, mostly relating to concerns about high densities and the impact on the character of settlements. Densities should be appropriate to retain the character of villages. High housing densities are not in keeping with village locations and can very easily adversely affect the character. Most new developments are too crammed.

Flexibility should be afforded within the policy to allow for the character of the surrounding areas in line with Creating Desirable Places section

A specific comment about flats, that para 9.39 encourages smaller accommodation, but then goes on to discourages flats. 3 storey blocks of flats would be appropriate in central settlements. However, on the other hand, welcome comment that 1 and 2 beds should not be flats, but suggest consideration is given to maisonettes.

Many comments about bungalows – expressing a desire for more bungalows and an appreciation of their importance to a mix of housing. Many comments saying there needs to be more bungalows and should specially ensure bungalows are included in new developments otherwise it's just lip service to older persons housing. In particular, it is important developing bungalows in rural areas for local residents who need to downsize but would like to continue to live in the local area.

There is going to be tsunami of older population – not enough consideration has been given to this. The section on the ageing population doesn't hit the mark. The housing needs for someone in their 70s will be different from someone in their 90s. Developers do not like bungalows as there is insufficient profit for them but that is what the older population often seek and there are just not enough built. The Council should ensure that a % of all schemes have housing that is fit for older people eg bungalows.

Bungalows sell for a huge premium and are hard for many people to afford.

When discussing older people's housing, mention of the need for parking, better garden sizes and that accommodation needs to be located close to facilities. Drop the one car housing idea. No consideration given to what supporting services are needed

The demand for properties for over 55s will also be out weighed by the supply. There is a natural turnover and that is demonstrated by the number of these homes always available on the market. The numbers of those able to afford such homes and the service charges that come with them will be fewer and fewer due to the fact that those currently in their 50s and below will not have the pensions that those currently in their mid-sixties and older have.

With regards to downsizing, people looking for a smaller home but not necessarily a small home.

More allocation for self-build should be included within new developments. However with regards to self build; support no specific requirement for sites to provide a certain proportion of plots for Self and Custom-built homes. Indeed, based on experience, the inclusion of self-built plots within larger developments can create significant problems during the construction stage, creating delays and reducing implementation rates overall. It is appropriate that the need for this form of development is treated separately from the overall market and affordable housing needs of the District as it is often more appropriate for self/custom-build developments to come forward independently.

With regards to accessibility, many comments received, mostly detailed comments from industry professionals. Comment that there are many references to wheelchairs, but more attention should be paid to 2nd loos being big enough to change an incontinence pad on an adult and the ease of fitting a stairlift.

Welcome the proposed flexibility on applying part M4(2) of the Building Regulations, Category 2: accessible and adaptable dwellings as some developments may have difficulties in delivering this requirement due to site constraints.

M4(2) is an optional requirement, with significant financial consequences beyond the mandatory M4(1). The wording in the consultation draft should reflect the building regulations of the time, rather than set its own ambition, which may consequently cause delays or viability issues for the delivery of housing.

Further consideration needs to be given over the deliverability of all private dwellings to meet M4 (2) standards, especially when considering the delivery of apartment blocks or maisonettes.

Par 2.4 states that a proportion of affordable homes may be required to provide wheelchair accessible homes where there is evidence that this is needed locally. This approach is not unreasonable however the HBF would suggest that following where evidenced by local need the council insert “and is viable and feasible”. This would ensure that there is sufficient flexibility in the policy to take account of those situations where it is not viable, or it is physically impractical for such a home to be built to part M4(3). We note that the Council’s viability study sets the cost of delivering a home to part M4(3) at £115 per sqm. However, the study also fails to recognise the difference between part M4(3)a and M4(3)b. The cost of delivering the later is significantly higher. As to how much the cost of these should be the HBF have seen similar studies which estimate the cost to be between £13,000 and £30,000 per dwelling depending on which standard is used.

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. 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’. 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”.**

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

Specific detailed comment with recommendations

Bloor Homes recognise the need to provide a range of house types and sizes on sites such as Land East of Horndean. Whilst identified housing needs will need to be met across the district, housing provision at Land East of Horndean should be reflective of the local requirements, and not that of the wider district. Consideration should be given to the purpose sites such as Land East of Horndean serve within their wider setting. The services and facilities both on and adjacent to the site are better suited towards families rather than households with no children. Smaller households are generally better suited to more developed areas with closer links to employment or public transport (rail) links.

As per proposed 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”. It is therefore important to consider what is and is not appropriate. Likewise, consideration should also be given to the fact that although smaller dwellings have a reduced footprint, a higher provision of these would likely result in more private cars overall on site. This may pose difficulties in providing sufficient and adequate parking, particularly to the design expectations of proposed Policy DES2. It is 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:...”**

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. Furthermore, subject to site suitability, affordable dwellings should also meet M4(2) standards, with a proportion to be ‘M4(3) ‘wheelchair user dwellings’ standards where evidenced by local need. Bloor Homes appreciate this requirement is subject to design considerations as it is not always possible to make provisions for accessibility and adaptability. It is noted that Paragraph 10 of the guidance for optional technical standards states that “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”. 9 It is suggested that there is 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”.**

Question: Policy H3 Affordable Housing - What are your comments on this policy?

Some comments in support, saying the percentage and thresholds are supported, and that the policy is clearly expressed and is necessary to facilitate access to housing which is below the market price. Provision of affordable housing is generally supported. Some note an affordability crisis.

Many comments note the cost of market housing in East Hampshire, saying even smaller properties are expensive and unaffordable for people earning certain salaries. Various comments with various figures making this point. Comments saying houses need to be genuinely affordable, and that currently affordable housing isn't affordable. Also that housing that is 20% off market value is not what it seems and is not really very helpful, i.e. these houses are still unaffordable.

Many comments relating the relevant proportions and thresholds in the policy. The % of affordable homes should be greater. More affordable housing should be built and the overall percentage of affordable housing on new build sites should be raised, provided that developments are still able to benefit the wider community. To meet the requirements covered in the previous paragraph it is proposed that the reference to "10 dwellings or more" be reduced to "5 dwellings or more" to enable more of the smaller properties to be built. These proportions won't meet need. Comments generally saying need more affordable homes, more social rent, more starter homes, cheaper market houses.

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

A comment questioning whether it happens in reality, so suggesting start with a higher percentage requirement to ensure it is implemented.

A comment that supports the objectives of policy H3 concerning affordable housing but objects to the prescriptive requirement to achieve 25% social rent as part of the overall requirement. The tenure mix should be left to the affordable housing provider in order that they establish the specific tenure mix suitable for the site at a particular moment in time. NHS Property Services suggests the Council considers the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area.

Concern that affordable housing could be lost through sales, so a plea received to make sure affordable housing stays affordable housing.

Kingsley Parish Council would like to see a higher percentage of affordable housing on the market locally as there is an identified need. We would like to see some clarity on establishing a clear definition of what constitutes 'affordable' in the context of the local community, and the need for a mix of tenure types. This may involve considering the average income, housing prices, and other financial factors specific to the area. In addition, another commentor says that it is difficult to define affordable.

Many comments on the quality and design of affordable housing provided – need to ensure that affordable still means quality housing, with adequate parking. Gardens and shared community spaces for food growing within developments should be part of the design for affordable housing, integrated into the housing mix of any development. Affordable housing shouldn't be hidden away. A suggestion that EHDC adopts a similar

aggressive policy as per the Cornwall Housing schemes where quality affordable family sized social housing is built and only offered to local residents and their families.

Some questions received about the evidence behind the policy – asking whether an employment study been carried out to see what the average wages are, and has the Council assessed what and how much the affordable house price would be in this area? (Four Marks/ Medstead/ Ropley and Alton).

With regards to deliverability and outcomes, comments that question whether 40% will actually be delivered, and whether developers promise things but then don't deliver due to viability.

Any affordable housing policy needs to address the problem that Affordable Housing Providers are not interested in social rented housing on smaller sites, and therefore villages that have a requirement for such housing will not have that need met.

At Neatham Down, the paucity of local services and facilities, and difficulties in providing subsidised bus services, are likely to thwart EHDC's ability to deliver the quantity of affordable housing required locally. Additionally, Site ALT8's crumbly chalk geology will make building here expensive, which is a further hindrance to affordability.

A suggestion that brownfield land should be redeveloped to deliver affordable housing

With regards to the general policy approach, a suggestion that a total overhaul of the affordable housing arrangements is needed. Another suggestion to return to the Council Owned Housing system where long term rental can be secured at this "affordable" rate. That is a rate which is say 5% above running costs so the council can service the properties. And that there should be policies that direct the industry to build market houses below the median house price for the District. The building industry should also be encouraged to build market houses that people can afford, for which there is a strong need. The policy isn't robust enough to meet need.

Nothing is affordable without local employment.

With specific regard to the policy wording; in terms of exceptions - An affordable homes allocation should be insisted on without exceptions in all development - a comment that says developers should not be able to buy their way out of the need for affordable homes; it is unclear why the provisions in paragraph 9.61 refer specifically to connections within "the parish", given that parish boundaries are relatively arbitrary and not necessarily linked to locality in any relevant way.

On the other hand, raise concern that 40%, alongside the prescribed tenure ratios introduced within this draft policy wording, has the potential to adversely impact housing delivery overall due to wider scheme viability implications. This is especially the case when considered in the context of previous performance shortfalls against this target and the new and additional policy requirements such as the mandatory (minimum 10%) provision of Biodiversity Net Gain on all applications for major development from 12 February 2024 onwards. Indeed, potential viability constraints are recognised by the HEDNA which states "...the amount of affordable housing delivered will be limited to the amount that can viably be provided. As noted previously, the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise." Accordingly, request that this draft policy wording should be modified to include a caveat that where viability of a development is in question, the percentage of affordable housing on a site could be negotiated on a site-by-site basis.

Greater clarity is required within the policy with regard to the mix of housing that will be sought through developments, insofar as this should have regard not only to the latest evidence of need but also to the characteristics of the site and the local area. The second

Criteria H3.2 (there appears to be an error with the criteria numbering) currently provides that the types and size of dwellings will be determined on a site-by-site basis, using ‘...the most appropriate information that helps deliver the type and size of affordable units needed’. This wording is currently too vague to be effective. The lack of specificity as to what sources of information the Local Planning Authority considers relevant in such circumstances introduces confusion to the policy wording, which may result in unnecessary delays to the planning process. This clarification is particularly necessary, noting East Hampshire’s extensive geography, which includes both urban and rural areas in three distinct character areas, where patterns of development and housing needs will be very different. In this regard, Policy H3 (as presently drafted) is **not justified**, nor will it be effective when used to determine planning applications. Therefore, the draft policy requires revision to introduce greater clarity, rendering it more practical and capable of reflecting the distinct requirements of the District’s defined spatial areas.

With regards to locations/concentrations; Binsted Parish Council supports Policy H3 for Affordable Housing, except that affordable housing should be distributed across our parish area, not all concentrated into the large Strategic Site. There is a severe disconnect between the policy and the proposed Local Plan implementation; the plan should explicitly state that affordable housing must only be built in places in which the intended occupants of such housing wish to live, otherwise they may remain unoccupied when built. It is likely that one or more family members in such households will not have a car available to them at all times and therefore will wish to live within reasonable walking distance of public transport and/or of schools, doctors' surgeries and shops; not too many in any one place, a balance needs to be made.

With regards to viability, one comment raises concerns about policy H3.5. The whole issue of viability has to be considered in the context of the affordability crisis. With the affordability crisis the priority must be to build houses that people can afford. To support this imperative, it will be necessary for any viability calculation to be based on a modest rate of Return of Capital over Expenditure(ROCE)

With regards to First Homes, reference to First Homes and the flexibility proposed by EHDC should be referenced explicitly within the wording of the draft Policy rather than solely the supporting text. It is also important that it is recognised that First Homes are also “the government’s preferred discount market tenure” and there is an expectation that “at least 25% of all housing units delivered by developers” will be First Homes (PPG; Paragraph: 001 Reference ID: 70-001- 20210524). The flexibility to discuss appropriate solutions on an individual site basis is therefore, supported, however, EHDC should not seek to utilise such discussions as a mechanism for preventing the delivery of First Homes within the District, where these are proposed.

Question: Policy H4 Rural Exception Sites - What are your comments on this policy?

Representations received generally support the principle of the policy with affordability highlighted as the key consideration.

Some comments have expressed disagreement with the policy on the grounds that development should not occur outside the defined settlement policy boundaries.

Some representations received in response to the policy object to the overall development of the Alton area and suggest that more housing developments should be built around Petersfield.

One individual letter of representation notes that current speculative applications in Medstead and Marks are located outside the settlement policy boundaries and raises the question of why this policy is not enforced.

The SDNPA recommends that the policy should also set out how EHDC would consider applications for RES in their Local Plan Area where the related settlement is in the SDNP.

Beech Parish Council suggests amendments to clause H4.1(a) to read:

“there is an identified local need as indicated by the most recent Hampshire Home Choice and as agreed by the Local Planning Authority and the relevant town or parish council”

They state that it is essential that there is local council support for, and agreement to, affordable housing developments on a particular rural exception site.

Four Marks & South Medstead Neighbourhood Plan Steering Group and SMASH support the policy subject local need being agreed by the Parish Council as well as the LPA and that market housing should be at a price below the median house price for the District.

Representation received from Headley Parish Council support the policy but only if all of the criteria in H4.1 are adhered to. They have also expressed that the small proportion of market housing should not exceed 25%.

Kingsley Parish Council has expressed support for the policy in conjunction with H3 and further suggests tailoring housing or development initiatives to address specific requirements within the Parish.

Worldham Parish Council agrees with the policy but emphasizes that the policy should be based upon identified local need.

Comments received from Rowlands Castle Parish Council recommend that identified local need should also be agreed with the Parish Council to ensure development is sited within suitable locations.

Alton Climate Action Network consider that market housing should not be permitted on such sites and suggest that reference is made to ensure that any such development is climate sustainable and biodiversity positive.

CPRE consider that the policy should be strengthened to include local need being agreed by the Parish Council as well as the LPA and that market housing should be at a price below the median house price for the District.

Representations received from Master Land & Planning Ltd on behalf of English Rural Housing Association outline support for the inclusion of a rural exception sites policy within the Local Plan as an important mechanism to deliver small scale rural affordable housing. However, they suggest amendments as outlined in their submission to ensure a positive framework is set for rural exception sites.

Comments received from PeCAN express that the policy will make it easier for different generations of a family to live closer together and for key workers to live nearer their work. They consider that the policy will enable a reduction in journey times and an increase in community resilience.

Representations from a site promoter highlight that the policy wording does not reflect the up-to-date version of the latest NPPF, with references to Entry Level Exception Sites.

Question: Policy H5 Specialist Housing - What are your comments on this policy?

Some support for this policy saying more is needed, but need a variety of types of homes and affordable. Expensive to downsize and not enough of the type of homes wanted. Important to have 2 bedroom properties, so a bedroom is available for a family member/carer.

It is the larger developments that are more likely to be able to include this type of housing.

On the other hand some comments saying no more of this type of housing is needed, particularly in Alton.

Should be enhanced with more specialist retirement facilities and nursing homes required.

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

There is an increasing need for specialist accommodation types to cater for this demographic change.

Quite a few comments reference bungalows, with a preference and need for bungalows. Not everyone wants a M&Stone type home, or a large home, but many would like a well designed and insulated bungalow. Bungalows are ideal to extend the time can stay at home before needing residential care.

Also quite a few comments about the location of such housing, noting that it should be in accessible locations, in settlements where there are services available. However, also need good public transport and avoid locating near steep slopes. This type of housing should be in towns and not in the countryside.

With regards to sites, the Council should take this further and identify specific sites to deliver care and extra-care accommodation through the Local Plan to ensure that the need for older persons accommodation within the District will be positively addressed.

A specific comment received in relation to viability and specialist housing – which is available to see in the 'Evidence' summary.

A comment relating to quantity, noting the HEDNA shows an increase in population of those 65+ to be 13,034. In this context, the figure included in the Plan of 1,590 requiring specialist care looks very low.

The Integrated Care Board (ICB) commented - Additional provision for older persons that exceeds the local needs will create an inward migration of people who will have higher levels of health needs and this will lead to increased demands on an already under pressure health system.

The Home Builders Federation (HBF) commented - The HBF would consider such an approach to be ineffective in meeting the specialist accommodation needs for older people across Basingstoke. The most effective approach to meeting the housing needs of older people is for the Council to allocate sites within the local plan for retirement housing and other specialist accommodation for older people. Given the competition for sustainably located sites will be high, allocation is the most effective way in ensuring such development will come forward over the plan period. The HBF would also recommend that the Council include within the policy the amount of specialist accommodation required to meet the needs of different groups within EHDC. Whilst this is not specifically required by national policy the HBF consider it necessary in order to be make the policy effective. If no

indication is provided as to what is needed, then it is not possible for decision makers to effectively apply this policy or for the council to monitor its effectiveness.

Highwood - Supporting text to Policy H5 at 9.71 This currently states, "The Local Planning Authority has an obligation to ensure that the housing needs for all people are considered and provided for wherever possible." This does not properly reflect the wording of the NPPF and PPG and should be amended to more fully reflect the critical nature of the issue as set out in national policy and guidance.

Question: Policy H6 Park Home Living - What are your comments on this policy?

A small number of comments received on this policy. Some agreement and acknowledgement that this provides a more affordable form of housing, and suggestion that there is a need and more should be provided. On the other hand some comments saying it is not needed or desired, and depends on the restrictions. Also that this type of accommodation is only affordable if the maintenance charges are affordable.

To prevent abuse of the planning system the criteria set out in H6.1 – 6.3 must be strictly adhered to. Other holiday caravan sites in the District, usually in very rural and unsustainable locations, should not be permitted to change to permanent residential status.

Question: Policy H7 Gypsies, Travellers and Traveling Showpeople Accommodation - What are your comments on this policy?

Some agreement saying the Local Plan needs to be inclusive, with more liaison with members of the Traveller community. Agreement but with further consideration needed to implementation and enforcement to balance growth with the preservation of local character and infrastructure integrity.

With regards to the specifics of the policy, a comment that it is unclear why d of H7.1 is not considered applicable to H7.3.

Some concerns raised about social problems experienced with current accommodation.

Where pitches are allowed, further permanent buildings on site should not be allowed.

Some acceptance that it is difficult to find suitable sites.

When permissions are granted, pitches are rented to others other than Travellers.

Current Statements of Common Ground will need to be updated to reflect an updated GTAA.

Traveller and Travelling Showpeople communities should be consulted on these plans.

Whilst there is a need for accommodation for GTTS, there are risks involved in designating areas as suitable for GTTS. A lot of additional thought needs to go into what is being provided, what people actually want, and how it can be managed so as to be successful and not result in social difficulties.

There is a country road in Four Marks where over 50% of the dwellings on the road are traveller sites. I would suggest this is too much in one small area. They should be spread out more equitably.

Welcome the Council's support for new transit sites through draft Policy H7.3.

There is insufficient surplus in Waverley to be able to accommodate any unmet need arising from East Hampshire.

Any update to Statements of Common Ground will need to take account of the new GTAA.

Hope the policy can help avoid retrospective applications.

Kingsley Parish Council

While we support this policy, Kingsley Parish Council believe there is a need for additional consideration to outline the specifics of its implementation and enforcement. A comprehensive strategy can be developed to ensure a balanced approach that promotes growth while preserving the local character and integrity of infrastructure. It is essential that existing sites adhere to these policies.

It is noted there are no plots identified for gypsies, travellers and travelling showpeople within the Kingsley Settlement Area nor the areas adjacent, which the Parish Council agrees with. Kingsley and the immediate surrounding area have several plots for Gypsies and Travellers, disproportionate to the size of the Village. In a small community there is a risk of imbalance in favour of the minority which can create tensions and risk the overlooking the housing needs of others in the Parish. There should be no need during the period of the Plan to approve any further land for use as accommodation for gypsies, travellers and showpeople given the provisions there already are in the area.

Question: Policy H8 safeguarding Land for Gypsy, Travellers and Traveling Showpeople Accommodation - What are your comments on this policy?

A small number of comments on this policy. A couple offering support, with one saying everyone should have the same rights.

Small sites should be well managed and maintained.

Sites are not needed in Alton

Not all pitches are occupied by Travellers.

It is more complicated and has proved difficult except where this is a historical connection to GTTS community.

Question: Chapter 9 Homes for All – Please provide any further comments on this chapter

Need more affordable housing, and housing for older people. New market housing not needed. The older persons housing that has been built isn't attractive to older people and doesn't meet their needs.

Strongly disagree with some of the housing proposals.

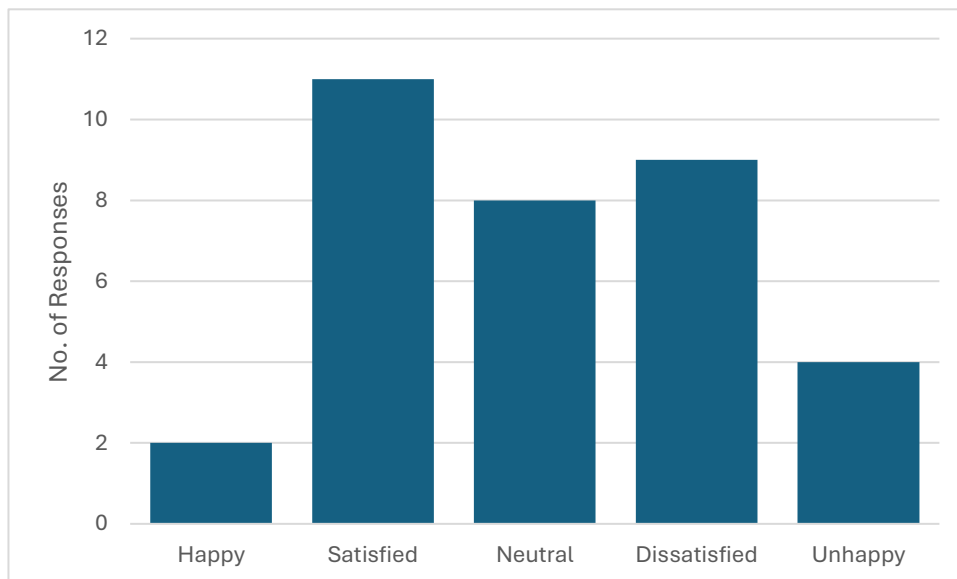
The aspirations laid out in this chapter do not align with some of the planning proposals that form part of this consultation.

While there are some laudable individual objectives, the plan imposes numerous onerous requirements (energy statements, lifecycle, sustainability, biodiversity etc) across multiple policies in various sections of the plan. In totality this will make the planning process more burdensome and discourage smaller developments (e.g. developments of single houses, extensions and improvements, which are typically much more sympathetic to maintaining the character and ethos of the area). These extra constraints will act counter to the objective of providing more accommodation and addressing housing need in the area.

EHDC needs to take responsibility for rural transport links. There is no point in having rural housing, business, leisure etc initiatives in areas where there are no buses, or if there are buses, there are only 3 per day and they don't run on Sundays. The plan objectives won't be met unless EHDC considers all aspects including transport.

Chapter 10 Supporting the Local Economy

Question: Chapter 10 Supporting the Local Economy – How do you feel about this chapter?



Question: Policy E1 Planning for Economic Development - What are your comments on this policy?

Local Plan seems to be all about housing – also need to local jobs,

Employment sites should be where the greatest number of working people are.

(Whitehill and Bordon Community Party) employment development is welcome and need commutable locations for business to operate.

Commuting data presented is out of date.

(Four Marks and Medstead NP group; SMASH) Need more employment sites to match growth in population to reduce commuting, included additional policies for more employment sites/ request further sites are identified close to public transport services

(CPRE) general support for employment policies but without provision of employment opportunities out commuting will increase and this will impact carbon emissions,

(Fight 4 Four Marks) concerned the LP does little to support employment in the district which results in commuting.

Plan does too little to support employment in the District. High levels of transport emissions are due to the amount of commuting undertaken in private cars because of the lack of employment opportunities; most people commute to work outside of the District; need more local opportunities – shared offices – workshops; commuting data is very dated

Need to safeguard existing sites and those with planning permission,

(Basingstoke and Dean Council) support policy to meet economic needs through intensification and allocations - need to ensure any required mitigation and infrastructure requirements are secured through the final policy wording

Need to reflect that there is an ageing population and jobs are available for those wanting to work locally including opportunities for young people

Need more small units to provide flexibility for 'non-office' activities;

Explore opportunities to sub-divide larger units

There are existing vacant commercial units how does the local plan ensure these are utilised.

(B&L PC) What are the criteria for determining a strategic employment site?

(Horndean PC) Support reference to skills and training agreements - how will these be applied to mixed developments?

(Headley PC) support policy in particular part c. that requires proposals within the countryside to demonstrate a need for development at that location and compliance with other plan policies.

Lack of reference to heavy/dirty engineering activities which are essential for the broader economy.

Question: Policy E2 Maintaining and Improving Employment Floorspace - What are your comments on this policy?

(Whitehill and Bordon Community Party, Whitehill TC) need to offer more incentives for businesses to attract companies and improve local employment opportunities,

Sites need to be identified and linked into the local education and training providers,

Vast majority of our economy is service based – to attract employment need low priced energy, low local taxes and strong digital communication links,

Promote green jobs involving solar energy etc

Need more investment in STEM

(B&L PC) What is the criteria for determining a strategic employment site?

(Four Marks and Medstead NP Group) agree safeguard existing sites and those with planning permission.

(Headley PC) support identification of strategic employment sites; local employment sites should be allowed to grow within their defined boundaries.

(Basingstoke and Dean Council) support policy to meet economic needs through intensification and allocations - need to ensure any required mitigation and infrastructure requirements are secured through the final policy wording.

(HCC) requirement for a 12 month marketing exercise could cause delay and costs to the disposal of sites - request policy provides flexibility to accommodate the unique role of public service providers and disposal of assets.

Need to increase amount of employment floorspace over that stated in the HEDNA to reduce commuting.

Question: Policy E3 Rural Economy - What are your comments on this policy?

(Whitehill and Bordon Community Party, Whitehill TC) To make a rural economy work further investment in the transport infrastructure is needed to ensure that workers can get to work.

Transport and transport links are vital for businesses – transportation of goods; supplies and workers

Need controls in place to ensure impacts are minimised particularly any detrimental impact on dark night skies; biodiversity; landscape and character.

(Kingsley PC) support appropriately sized industrial/business parks within the locality to cater for local needs; promote rural diversification

Policy should allow for the expansion of employment sites in rural areas in appropriate circumstances

(Headley PC) criteria listed in the policy must be applied to each application

Encourage agricultural businesses and diversification

Support local businesses – offer guidance and assistance to farmers/landowners considering diversification

Improve provision for home working (digital improvements such as fibre Broadband and improved mobile phone reception) ;

Encourage provision of working hubs to reflect changing working practices to enable local business to thrive and to support the local economy.

(HCC) request additional bullet to policy:

the public rights of way network and should not result in an adverse impact on that network, rather it should provide protection and enhancement, both onsite and offsite, including to the safe public priority use of the public rights of way network where relevant. This may include suitable and enhancing diversions. Developments that propose intensification of motorised vehicle use of public rights of way will not be supported due to public safety impacts. Alternative access routes shall be proposed.

No reference is made in the wording of Policy E3 or its supporting text regarding equestrians and the equestrian industry's contribution to the rural economy. The equestrian users and equestrian industry are dependent on a connected PROW network (particularly bridleways).

(SDNP) request reference is made to the setting of the SDNP in first bullet E3.1

Question: Policy E4 Retention, Provision and Enhancement of Tourism Uses - What are your comments on this policy?

Tourism plays an important role in our local economy. Need to protect and preserve tourist attractions.

Need improved hotel accommodation and free car parking; some tourist facilities should be made free as this will bring extra money to the economy

Policy is weak and allows for existing tourism facilities to be redeveloped.

Need to improve marketing of the District.

To attract tourist a reliable transport system is needed

(HCC) request an additional bullet to the policy

d. the development mitigates and compensates any adverse impacts to public green and transport infrastructure, such as intensification of the use of PROW, sensitive green spaces, or Country Parks. This may include onsite and offsite obligations including contributions.'

request additional wording to para 10.56 *'This can be notable for the PROW network and public green space.'*

(SDNP) support Criterion E4.2(b) but request that the criterion is expanded to explain that proposals should provide opportunities for visitors to increase their awareness, understanding, and enjoyment of the special qualities of the South Downs National Park (SDNP).

Also request that reference is made to the South Downs Tourism Strategy 2015-2020.

Question: Policy E5 Retail Hierarchy - What are your comments on this policy?

Numerous comments in relation to the re-use of vacant units; encourage businesses to fill town centres;

(Whitehill TC, Whitehill and Bordon Community Party); need financial incentives to encourage retailers, rates and rents too high ; lack of choice of shops so people go elsewhere.

People need to travel outside East Hampshire to purchase a range of goods.

How will the designated neighbourhood centres be sustained?

These areas are important in maintaining vibrant local communities and having basic retail facilities within walking/cycling distance. They need to be retained otherwise car journeys will increase.

(Headley PC) – Headley qualifies as a neighbourhood centre

(Alton TC) agree with town centres first approach

(Bramshott and Liphook PC) retail centres in Liphook - distinction seems arbitrary especially as two centres are effectively “bridged” by Sainsbury’s

(Four Marks and Medstead Neighbourhood plan group) agree with listed hierarchy -new retail development should be in keeping with the local character of the settlement where it is being located.

Agree with the retail hierarchy as proposed; any development should be appropriate to the role, function and distinctive qualities of each individual centre.

Question: Chapter 10 Supporting the Local Economy – Please provide any further comments on this chapter

(Hart DC) support EHDC’s economic policies which meet the needs of local businesses and employment through a focus on strategic employment sites, and the rural and tourist economies.

(Network Rail) proposals for housing and employment development in addition to encouraging alternative modes of transport to the car has the potential to increase passenger traffic on the rail network.

(SDNP) There are a number of towns and villages in the district which are identified as gateways to SDNP, acknowledge the potential for the increased role of tourism and visitor-related development within the setting of the SDNP. Welcome measures to ensure that tourism benefits towns and villages, providing that any tourism-related development is sensitively designed when in the setting of the SDNP.

(NHS Property Services) ensure affordable housing for NHS staff is factored into employment and economic policies.

(We are Cycling UK) utilise cycling and walking as the main modes of travel, specifically education, shopping and employment. By development being located in the most accessible areas, there is greater opportunity for the active travel modes to be utilised more frequently and to connect between different places

Focus on Alton is flawed, more of the housing need could and should be shared across East Hants, especially South given its proximity to significant employment areas such as Portsmouth, Whiteley etc.; lack of improvement/expansion for employment provision to reduce out commuting (Alton) ;

Horndean could be used for a larger manufacturing/distribution centre given its accessibility to A3 corridor

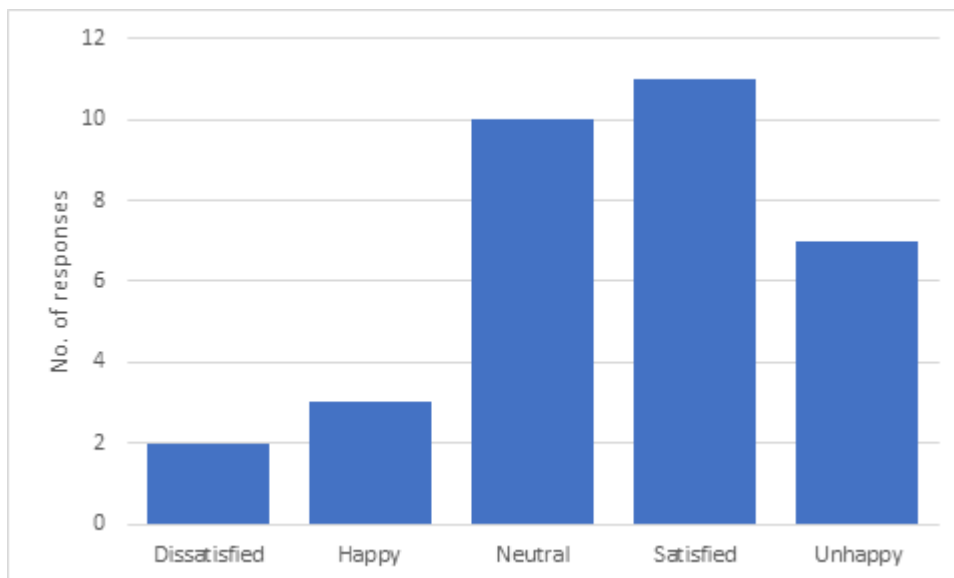
Numerous comments from site promoters suggesting their (housing) sites could also offer employment opportunities

Site specific comment - Passfield Business Centre, Lynchborough Road, Passfield

The East Hampshire Employment Land Review Update 2023 recommended safeguarding the site as a local employment site within the Local Plan. Request that the settlement boundary is adjusted to follow the extent of the local employment site.

Chapter 11 Development Management Policies

Question: Chapter 11 Development Management Policies – How do you feel about this chapter?



Question: Policy DM1 The Local Ecological Network - What are your comments on this policy?

(Natural England) recommend that further emphasis is placed on how the local ecological network policy and any associated mapping will link to the Local Nature Recovery Strategy (LNRS).

(Headley PC, Horndean PC) support policy.

(M&FMNP) Suggest DM1.1 is too vague. Does not say enough about what the scale of 'harm' or 'benefit' is.

(Common Place) Many of the representations received linked to other policies in Chapter 5 'Safeguarding our Natural and Built Environment', such as BNG, SPA/SAC buffers and offsetting. However, in general the policy was well received and seen as important.

It was considered that the policy links well with LNRS, so it is considered important that these are rolled out in some haste.

Question: Policy DM2 Trees, Hedgerows and Woodland - What are your comments on this policy?

(Common Place) The policy is supported with responses stating that it is important to protect trees, hedgerows and woodlands. It was, however, considered that it could be strengthened, for example, by providing a buffer around all woodland not just 'ancient' woodland.

(Headley PC, Rowlands Castle PC, Worldham PC, Grayshott PC) support the policy but one response suggested an edit to paragraph 11.11 to highlight Tree Protection Plans must be submitted and compliance with these should be enforced.

(Bramshott & Liphook PC) Suggested that para 11.16 should include provision of adequate root space using industry standard calculations. Trees in development must include large canopy species alongside other forms.

(Alton Climate Network Group) requested that reference is made to the importance of retaining native trees, plants and hedgerows.

(Medstead & Four Marks Neighbourhood Plan Steering Group) suggested that the policy is linked to Policy NBE 3 to enable BNG to be quantified and request that the policy applies to all mature woodland greater than 10 years.

(The Woodland Trust) wholly support the policy and consider it robust but have suggested some additional wording to link it to policies CLIM5. Additional wording has also been suggested regarding canopy cover and reference to 50m buffers.

(Developers) One response requested flexibility should be built into the policy which allows compensation through replanting. Paragraph 136 of the NPPF states “existing trees are retained wherever possible” and not as an absolute, therefore, DM2.2 should be amended to reflect this.

(Individuals) Generally support the policy. However, one response felt the words ‘harm’ and ‘benefit’ are words developers could exploit. Another response felt DM2 should be cross linked to NBE3 BNG.

Question: Policy DM3 Conservation Areas - What are your comments on this policy?

Representations received support the preservation of the Local Plan Area’s Conservation Area’s. Some concerns relate to the impact of development from the proposed site allocation at Neatham Manor Farm (ALT8).

Further concern has also been raised that the potential development proposal of Neatham Manor Farm will have a significant impact on the listed buildings and character and setting of Holybourne Conservation Area.

A suggestion has been made that the policy should be updated to include a reference to the need to have regard to the Conservation Appraisals.

Statutory consultee responses mostly support the policy in principle but suggest that some of the phraseology is changed. Concern has been raised that there is no reference to protected species or a requirement to submit a Protected European Species survey for demolition proposals.

Question: Policy DM4 Listed Buildings - What are your comments on this policy?

This policy is supported with comments stating that listed buildings must be preserved and protected from new development. It has been suggested that listed buildings must also be safeguarded from passing construction vehicles due to the threat of undermining the

structural integrity of the buildings. Development proposals should be supported by a Heritage Statement.

A suggestion has also been made stating that further support should be available to landowners for the repair and maintenance so as to avoid deterioration and disrepair.

Representations further suggests that energy efficiency measures such as the installation of double glazing should take precedence, and reference has been made to Winchester District Council's guidance on historic buildings and energy efficiency.

A comment has been received referring to the impact of the proposed site allocation ALT8 (Neatham Manor Farm) on the historic character of Alton.

Overall support has been received from Parish Councils and statutory consultees. Historic England has suggested some amendments to the wording of the policy so as to avoid any confusion about what is meant by 'over-restoration'.

Question: Policy DM5 Advertisements Affecting Heritage Assets- What are your comments on this policy?

This policy is supported with comments welcoming the protection and enhancement of the Conservation Area and the renovation of listed buildings.

Historic England welcomes this policy and suggests that alternative phrasing is considered.

Question: Policy DM6 Shopfronts Affecting Heritage Assets - What are your comments on this policy?

This policy is supported with comments welcoming the protection and enhancement of the Conservation Area and the renovation of listed buildings.

The policy is supported by Historic England with the suggestion of minor typo amendments.

Question: Policy DM7 Archaeology and Ancient Monuments - What are your comments on this policy?

This policy is strongly supported with comments empathising the need to protect the historic integrity of designated heritage assets. It has been suggested that new development should not affect the academic interests of the ancient monuments and sites.

One comment refers to the Allen Gallery (subject of a recent planning application to alter and extend) and the Curtis Museum and the impact of proposed development adjacent to ancient monument.

Historic England welcomes strong protection to conserve archaeological remains but considers that there is some conflict in some of the criterion with criterion NBE14. Suggested text has been provided to address this concern.

Question: Policy DM8 Historic landscapes, parks and gardens - What are your comments on this policy?

Many of the representations support this policy. Medstead & Four Marks Neighbourhood Plan Steering Group suggest that some of the phrasing in the policy is subjective.

Comments from Binsted Parish Council question the proposed site allocation ALT8 (Neatham Manor Farm) and the potential impact on the nearby Roman town site, villas and road. Thus, BPC request that a full archaeological evaluation should be carried out before determining the sites suitability.

Historic England has suggested adding some additional reference to 'enhancements' but are not clear about the purposes of some of the criterion.

Question: Policy DM9 Enabling Development - What are your comments on this policy?

This policy is generally supported with some commentary highlighting the impact of the proposed site allocation at Neatham Down on the Alton and Holybourne Conservation Areas.

Historic England has raised objection to the policy on the basis that it does not align with the Local Plan and suggested that it is deleted.

Question: Policy DM10 Locally important and non-designated heritage assets - What are your comments on this policy?

Representations received agree and support this policy.

Historic England welcomes the opportunity to discuss the section heading. It is expressed that Policy DM10 should refer to 'non-designated heritage assets' as referring to both 'locally important and non-designated heritage assets' risks implying the former is not a type of the latter. Further clarity is required on the Council's approach to local listing in the supporting text. Further comments express concern about the supporting text.

Question: Policy DM11 Amenity - What are your comments on this policy?

This policy is generally supported but comments have been made suggesting that ensure that amenity is maintained so as to avoid harmful impacts and to enhance visual amenity by the planting of additional street trees.

One representation has been received advocating that new infrastructure should be built simultaneously with residential development and not afterwards. This representation is echoed in the representations from Whitehill Town Council & The Whitehill & Bordon Community Party.

Hampshire County Council has suggested additional wording to support the consideration of new development on the amenity of buildings, spaces and public rights of way.

Question: Policy DM12 Dark Night Skies - What are your comments on this policy?

In general terms, this policy has received support, but comments have been submitted suggesting that the policy should be clearer on what it is seeking to achieve and that it should impose lighting restrictions.

The South Downs National Park Authority (SDNPA) supports the policy but recommends that the wording is strengthened in line with the approach of the SDLP Policy SD8 (as appropriate). The policy first needs to set out that development must conserve and enhance the intrinsic quality of the dark night skies, and that development must demonstrate that all opportunities to reduce light pollution have been taken in order to ensure that the measured and observed dark sky quality is not negatively affected. Further commentary has been provided on suggested mitigation measures which will align with the adopted SDLP.

Medstead & Four Marks Neighbourhood Plan Steering Group and Fight 4 Four Marks welcomes the Policy and considers that it will have a marked effect on the rural parts of the District.

Question: Policy DM13 Air Quality - What are your comments on this policy?

(Natural England) This policy does not recognise air quality in reference to ecological receptors, namely European sites. This should be mentioned in this policy.

There is support for this policy, specifically in relation to all future residential properties required to provide electric charging infrastructure. However, concern is raised that future planned residential and employment developments will only worsen air quality and contradict the aims of the policy, primarily by consequential increases to traffic volumes, thus contributing to poorer air quality. Responses highlighted that this is most likely to occur in relation to the Neatham Down proposed development site and in the vicinity of surrounding Alton and Holybourne. Responses also highlighted that large improvements will be required to public transport to ensure the Neatham Down site is not detrimental to air quality by reducing its car dependency. Suggestions have also been made that to overcome detriments to air quality, future development should be sited closest to transport provision in the tier 1 and 2 settlements of the settlement hierarchy. Suggested additions to this policy were to ensure there are sufficient carbon absorption methods are in place for future development, as well as being specific about such measures and expectations for developers to meet. HCC suggest that the LP should seek to address inequalities in health outcomes from poor air quality and can provide data and evidence to support this.

The SDNPA have stated that the policy should also capture potential effects on environmental designations.

Question: Policy DM14 Public Art - What are your comments on this policy?

This policy is supported with suggestions that it should be funded by the developers and that 'low - embodied carbon or recycled materials' are used.

The South Downs National Park Authority support the reference to historic, landscape, and/or cultural relation.

Question: Policy DM15 Communications and Infrastructure - What are your comments on this policy?

Representations received generally agree with the policy and highlight the issues of poor signal in some of the planning areas. It has also been suggested that telecommunication companies should be required to use cabling as opposed to masts in town centres.

Headley Parish Council has suggested that the policy should contain additional criterion that requires the removal of redundant infrastructure such as telecommunication masts.

PeCAN has noted that the policy does not refer to impact on wildlife or human health nor does it mention materials.

Question: Policy DM16 Self-build and custom housebuilding - What are your comments on this policy?

Representations indicate general support for the policy, providing that the policy meets the overall objectives of the Local Plan. The South Downs National Park Authority seeks clarification on the 'proportion' of development.

Medstead & Four Marks Neighbourhood Plan Steering Group has raised some concern on the viability of some of the candidates commencing self-build projects, and the subsequent effects on the immediate area of any non-completed projects.

Rowlands Castle Parish Council has raised concern about building outside the settlement policy boundaries and has suggested that the Council seeks a policy that addresses the issue of the incremental erosion of the countryside from the cumulative impact of new dwellings.

Question: Policy DM17 Backland development - What are your comments on this policy?

There is some support for the policy but some of the representations suggest that the policy should be more robust.

Medstead and Four Marks Neighbourhood Plan Steering Group stress the importance of Policy 1 A Spatial Plan of the Medstead and Four Marks Neighbourhood Plan and raise concern about the Settlement Policy Boundaries review and the development of residential gardens outside the SPB's. Concern has also been raised that the policy will not be fit for purpose if the Council does not have a 5 Year Housing Land Supply.

Headley Parish Council suggests that there should be a similar policy setting out criteria for infill plots and windfall sites.

Rowlands Castle Parish Council has expressed that if development is more likely than not to be permitted, then the form of the development must respond to local character. Residential gardens provide habitats to a range of insects, birds and small mammals. The loss of larger gardens to development will have a significant adverse impact on wildlife and therefore, there should not be a presumption that backland development will be permitted.

HCC has requested that the policy includes references to the Public Rights of Way network.

Question: Policy DM18 Residential extensions and annexes - What are your comments on this policy?

(Natural England) Certain extensions or annexes may be subject to mitigation requirements depending on their scale, design, planning restrictions or conditions.

Historic England suggests adding heritage significance to the considerations in DM18.1

Representations received generally support this policy. A suggestion has been made that the policy should prevent the loss of bungalows.

Beech Parish Council state that the policy as drafted is subjective and inadequate and should refer to maximum percentage uplifts in floor area as previously adopted.

Historic England request that the policy refer to heritage significance.

Question: Policy DM19 Conversion of an existing agricultural or other rural building to residential use - What are your comments on this policy?

Natural England recommends that the policy should refer to the importance of the SDNP management plan. Many developments within protected landscape areas could impact on the setting of the SDNP, reference to this would be recommended in the policy.

Alton Climate Action Network considers that the conditions in DM19.c are weak so as undermine the Policy (e.g the requirement for a local housing need would apply across the whole district).

This policy has generally received support, but several objections have been made in respect of the over requirements of the policy, loss of employment uses, creation of new dwellings in the countryside, and overall weakness of the policy.

Whitehill Town Council and the Whitehill & Bordon Community agree with the policy.

Beech Parish Council object to the policy as they consider the policy to be too broad. "Other rural building" can be taken to mean any building outside of a settlement policy boundary. This would give rise to the creation of new dwellings in the countryside

HCC has suggested that the policy includes references to the impacts of development on the Public Rights of Way network.

Question: Policy DM20 Rural worker dwellings - What are your comments on this policy?

Representations received support the policy. Headley Parish Council suggest clarification on the definition of rural workers.

Alton Climate Action Network consider that some of the wording undermines the effectiveness of the policy.

Question: Policy DM21 Farm & forestry development and diversification - What are your comments on this policy?

General support for the policy and recognition of the contribution agriculture and forestry make to the local economy. HCC requested that the policy includes references to the Public Rights of Way network.

Question: Policy DM22 Equestrian and stabling development - What are your comments on this policy?

The policy is generally supported but representations suggest that it requires adequate monitoring and enforcement. Hampshire County Council recommend additional criterion that relates to the Public Rights of Way network.

Question: Policy DM23 Shopping and Town Centre Uses? - What are your comments on this policy?

General support, but observations of the number of vacant units in town centres and suggestions that financial incentives are needed to attract new businesses. Specific comment on part DM23.2b in relation that out to town locations are unlikely to offer goods people can transport on public transport.

Question: Policy DM24 Alton town centre – primary shopping frontage - What are your comments on this policy?

Number of comments on quantity of vacant shops, parking charges, too many barbers, charity shops, excessive business rates. Agreement to the need to focus on the retail core of Alton and allow other uses outside of this.

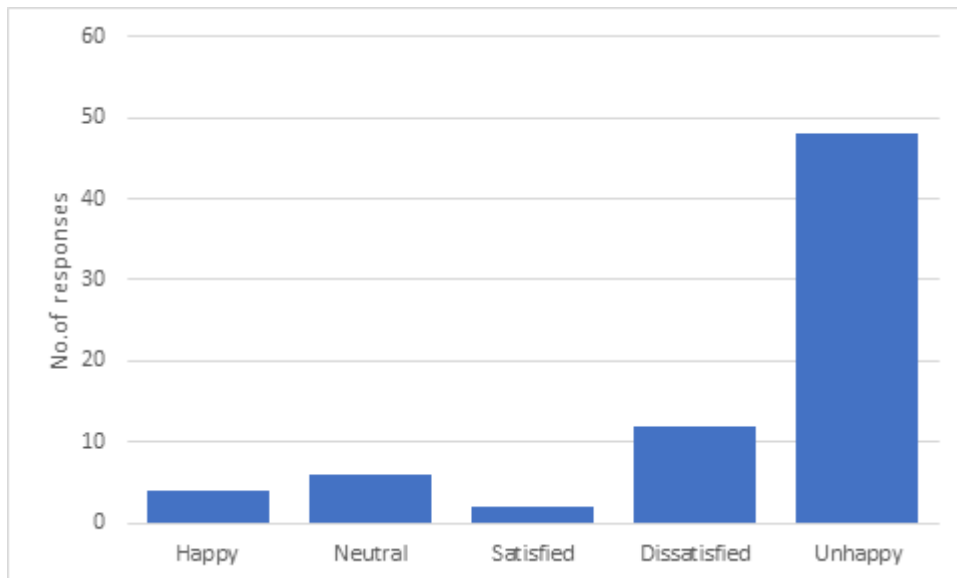
Question: Chapter 11 Development Management Policies – Please provide any further comments on this chapter

A small number of additional comments received, including saying this chapter is too large, the policies could be strengthened in places, and it is a good collection of policies if can be successfully implemented. Some comments just direct back to other comments already made.

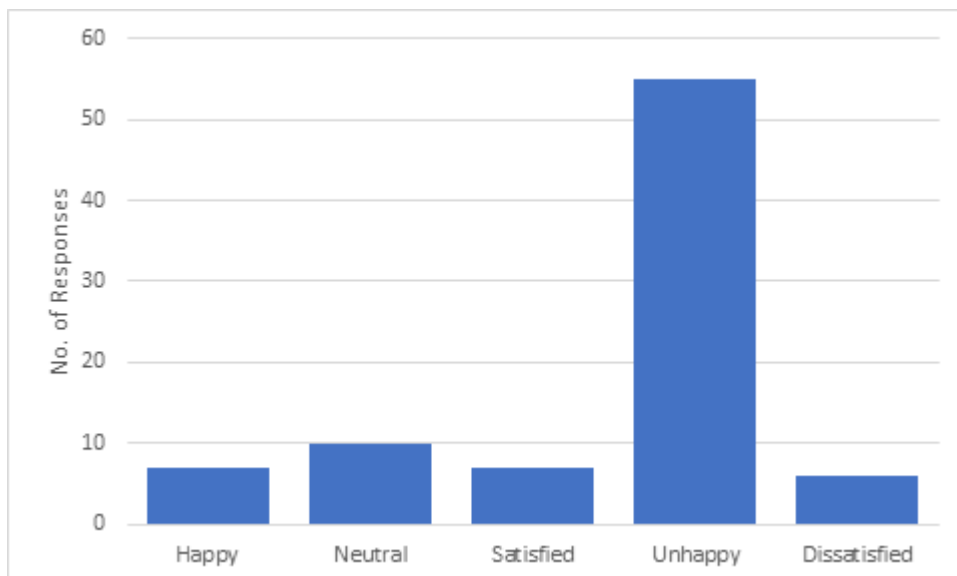
A couple of specific site comments, including about Neatham, which are generally picked up in elsewhere. One specific concern about developers buying single homes in Lindford and concerns about the condition of those sites. Also noted that have to preserve what is good, but also move forwards with the times.

Chapter 12 Site Allocations

Question: Chapter 12 Site Allocations Understanding the Sites
– How do you feel about this?



Question: Site ALT1 Land at Brick Kiln Lane, Alton - How do you feel about this site?



Question: Site ALT1 Land at Brick Kiln Lane, Alton - What are your comments on this site?

Some support for the proposed site. General reasons relate to benefits of new homes in terms of supporting the town shops and facilities, good connections to the town, and improvements to the roundabout. Some comments offer support if the impacts can be mitigated, particularly that the impact on the River Wey is well managed, and good, safe pedestrian and cycle links to other areas of the town. A comment stating the urgent need for housing, however, that the emphasis should be on creating sustainable communities.

Comments saying that if development does go ahead, the design and type of houses need to be attractive as the site is the gateway into Alton. There should be a green buffer to minimise the impact from building. High density/high rise would not be appropriate. A comment saying that smaller homes are needed, 2,3 bed, and affordable homes.

General concerns about the erosion of the countryside, and the creation of sprawl and the urbanisation of Alton. The excessive sprawl in Alton is creating unsustainable development. The site is too far away from the town, and residents will not walk those distances. The sprawling development risks removing the strategic gap between Alton and Beech, which is not in line with policy in the Draft Local Plan.

The amount of homes proposed is too high, and doesn't align with the developer's stated aspirations for the site (over 200 homes). Need to understand the number of homes to plan for infrastructure and site mitigation.

Many respondents raise concerns about the impact of new homes on infrastructure. The scale of this development will have a detrimental impact on services, roads, facilities and utilities. There is no planned improvement to healthcare, policing, fire etc. Chawton Park Surgery cannot cope with the already existing patient numbers, funding would not be sufficient to cater for the already over stretched services. More staff is needed, not more floorspace.

The Basingstoke Road is already too busy to facilitate this development. The B3349 is already too busy, and the width is not wide enough in parts for such heavy use. Significant upgrade of the junction of A339 and B3349 is needed, along with much wider pedestrian and cycle access to connect with town and sports centre/Dr surgery. The current pedestrian access to Alton is along a very narrow path with fast moving traffic.

The wording in the Draft Local Plan states that Brick Kiln Lane is 'unlikely' to be used as access. Brick Kiln Lane must not be used as access for this site. It is too narrow (one track), steep, and occasionally gets icy/slippery. It is commonly used by walkers

The proposed development would have an adverse effect on the amenities of local residents due to congestion and impact on services.

The development will have adverse landscape and visual impacts.

A site survey from the public footpath at the edge of Ackender Wood should be carried out to fully understand the visual impacts of it.

A lot of comments received raised concerns about flood risk. Comments saying that the site regularly floods, and development will increase flood risk, by increasing run off. Flooding occurs onto the A339 and footpath. The topography is cited as one of the main reasons for this, steeply sloping. Also that the site is the source of the River Wey and therefore risks altering the hydrology of the river. It is suggested that the number of homes needs to be lower with significant SUDs.

This is a rare protected chalk stream. The area that floods should be protected to ensure it can flood in the future, as it is groundwater flooding, not excess overland flow. The hydrology and geology is unsuitable for this proposal. There have been problems for existing development.

Run off from the surrounding land and the new development already in place has required a bund but this has not been done well and is inadequate in heavy rainfall periods at the moment. This is only set to get worse with continued climate change and would not be sufficient for a potential 4 degree rise which is what the CCC Adaptation framework requires there is preparedness for.

Also concerns about water pollution and water quality. The River Wey source has already become a polluted dumping ground, building further houses near the source will cause an environmental impact on the river. The land feeds into the River Wey - likely further deterioration of the water quality of this river.

The light pollution generated by this site will have a negative impact on the local wildlife - in particular the animals and birds in the two adjacent woodland - including that of the ancient woodland at Hungry Copse. The light pollution and visual intrusion of this site will also alter irreparably the rural nature of Beech.

General concerns about the loss of wildlife.

There is no mention of the sunken lane and the constraints it presents.

Many comments refer to the impact of development on the local landscape, particularly concerned about the surrounding hill/greenery no longer being visible from Alton, and noting that this site acts as part of the natural setting and entrance to Alton. The Hop Field site is relatively small, well landscaped and adequate; to extend housing the other side of Brick Kiln Lane and in such a vast area is unsightly and takes out a great swathe of countryside, dwarfing too Will Hall Farm.

Some comments note that if developed, a lot of attention needs to be given to mitigating the adverse landscape impacts and visual impacts.

The site is on a steeply rising site which will have a material and adverse landscape impact both when entering the town and also the distant views from the ancient woodland and woodland opposite (not in line with the proposed landscape guidelines of EHDC). It is also adjacent to an area of ancient Woodland (Hungry Copse) again having a material negative impact on landscape).

The site reaches very high and would be visually intrusive for all current dwellings reaching past Highridge. This site and number of dwellings would be twice as large, higher and steeper than the recent development at Brick Kiln Lane.

Concerns about the loss of agricultural land and land that is used for farming, to grow crops and provide food. Also concern about Heritage landscape loss and heritage buildings; ie the farm itself will be lost within a sprawling modern estate.

Some comments state that development here would be contrary to other policies in the Draft Local Plan, and Government policy, particularly in relation to environmental considerations and climate change. Also the Government's statements about building on brownfield land.

Comment that the constraints outweigh any benefits to this development and given the prominent location it should remain farmland.

A query saying that Hungry Copse is also wooded land used for a private shoot; and whether can build housing in such close proximity to land used for shooting.

The Defence Infrastructure Organisation have responded in relation to the RAF Odiham height and birdstrike safeguarding zones. Development exceeding 91.4m high will trigger consultation requirement.

The Environment Agency has raised significant concerns about the proposed housing development. This site is located at the headwaters of the North Wey, a designated chalk stream and a priority habitat with high ecological value. Concern has been raised that the proposed development could:

- Increase sedimentation and nutrient pollution, harming sensitive aquatic life.
- Alter water flow patterns, impacting spawning and migration of fish and invertebrates.
- Fragment important habitats and disrupt ecological connectivity.

This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a site-specific policy should ensure that a contamination investigation along with a remediation strategy and verification process is included.

It has been recommended that a site-specific policy should sets out the requirement for a Flood Risk Assessment. It has also been recommended that development avoids Flood Zones 2 & 3.

HCC Highways has expressed that the site access is expected to be achieved from a new roundabout at or in the vicinity of the A339/ B3349 junction depending upon further feasibility studies and assessment of the site constraints to be undertaken by the applicant.

Pedestrian /cycle crossing provision would be required on certain arms of roundabout to facilitate active travel access west along the A339 towards Beech, east along the B3349 providing a route into the town centre and south along Pertuis Avenue A339 towards the leisure park.

A combined access and the A339/B3349 junction would limit the requirement for new access points onto the A339 in accordance with the DM2 policy of LTP4.

Historic England raise objection to the proposed site allocation on the grounds that beyond identifying the presence of nearby listed buildings, it is unclear if the Council has examined the potential impact(s) of development on the significance of the adjacent heritage assets, especially the importance of an open, agricultural setting to the significance of Will Hall Farm and its associated listed buildings. They recommend that a heritage impact assessment (HIA) as the route through which it can be explored.

Thames Water do not envisage infrastructure concerns regarding wastewater networks.

Alton Town Council has no objections to the proposed site allocation of the site, provided that the principles of development that were found acceptable by all parties (the developer, EHDC, Alton Town Council and Beech Parish) present at the online workshop held in June 2021 are followed. Development should be focussed on the eastern half of the site (on the slope facing southeast towards existing Alton housing) rather than on the western half of the site (on the slope facing west towards Beech village). In this way:

- (i) The development stays within the urban 'Alton section' of the Wey valley, and does not stray into the entirely green rural 'bowl' of the 'Beech section' of the Wey valley;
- (ii) The green gateway to Alton, along the A339 from Basingstoke, is preserved; and

(iii) The “potential adverse landscape and visual impacts” acknowledged in the Draft Local Plan will be mitigated.

Alton Town Council has stated that it would strongly object to any proposal to develop on the slopes facing west towards Beech on the grounds of:

(i) reducing the size of the rural gap between Alton’s urban area and Beech village by a significant amount, in a manner that threatens Beech as a distinctive settlement; and

(ii) introducing a slab of urban housing into the entirely rural landscape that comprises the A339 corridor in the dry valley that contains Beech village.

They further state that an exit from site on to the Basingstoke Road taking the form of a roundabout at the junction with Pertuis Avenue would be supported.

Alton Ramblers Groups has expressed that good access to Brick Kiln Lane is essential and has suggested that a suitable crossing point on the A339 (if safe) is vital for connectivity.

Hampshire & Isle of Wight Wildlife Trust has raised concerns about the proximity of the site allocation to rivers. 20m natural buffers between watercourses and developments will ensure protection for biodiversity and reduce the risk of pollution reducing water quality.

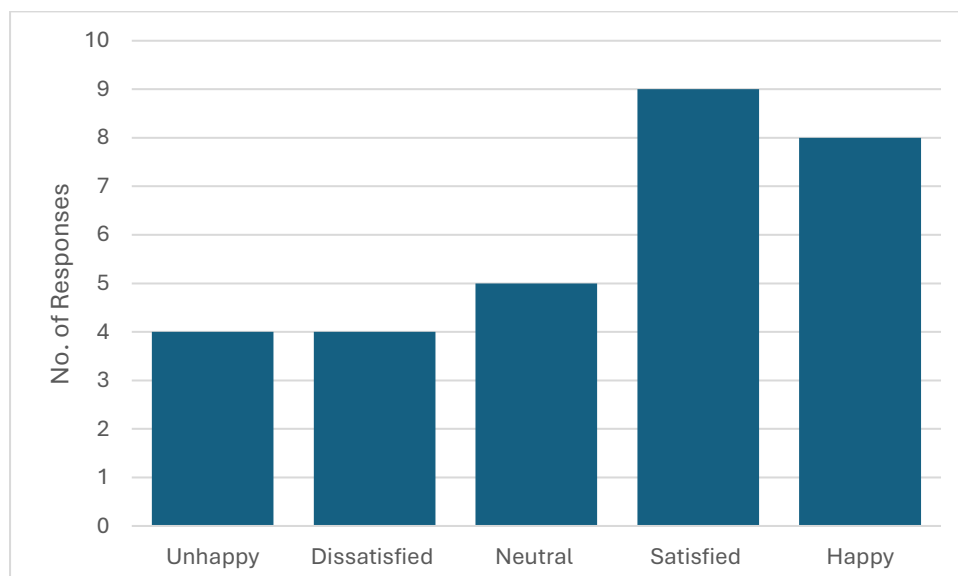
The Woodland Trust note the adjacent area of ancient woodland, Hungry Copse and suggest that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

Falcon Developments support the proposed site allocation subject to an additional allocation at BEE-011 to deliver a more comprehensive development proposal to the west of Alton.

Hallam Land Management Limited support the proposed site allocation and suggest that the site should be allocated as a first priority ahead of development at ALT8 east of the A31.

Tanvale Ltd consider that the in view of the objectives of the draft local plan, the proposed site allocation is contrary to objective B1, in ensuring that new developments are located to maintain and improve the quality of natural environments.

Question: Site ALT2 Chawton Park Surgery - How do you feel about this site?



Question: Site ALT2 Chawton Park Surgery - What are your comments on this site?

Comments received mostly support this allocation, acknowledging the need for more health infrastructure in Alton. Respondents are keen to stress that there is considerable need for health services for a growing and ageing population in Alton, and that this is a valued but oversubscribed surgery. There is concern about parking provision, stating that more parking is needed to support an extension and that people don't generally walk or cycle to a doctor's surgery.

There are also comments stating that both surgeries in Alton are oversubscribed, and that alongside this allocation, a similar project is needed at the Wilson Practice, and a new health facility. Query whether this proposal alone can meet the health needs from the quantum of housing proposed in Alton. A new surgery is needed in central Alton – this would be a more sustainable less car dependant option.

This proposal cannot support the need generated from Neatham Down development – it is also too far away.

There are general concerns about challenges to resource additional floorspace in terms of staff / medical professionals.

Some comments expressing it is an appropriate site for an extension given location with other health facilities, some concerned that an extension would result in loss of parking. The proposal will be car dependent and will need to retain or increase car parking. Others concerned that it is on the 'wrong' side of Alton in relation to the location of proposed new development. Comment that needs better use of the Community Hospital.

Some suggestions that the CIL funding allocated to the project so far (£50k) is insufficient to be meaningful, another suggestion that the entire project should be funded by developer contributions.

Environment Agency

Source protection zones 2 and 3, principal aquifer, history of land contamination, surface water /and or groundwater flooding.

Contamination - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a site-specific policy should ensure that a contamination investigation along with a remediation strategy and verification process is included.

Surface water /and or Groundwater Flooding - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.

DIO

Safeguarding Zone affected: RAF Odiham (height and birdstrike safeguarding zones)

Development triggering statutory safeguarding criteria

Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. • Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.

Woodland Trust

There are significant numbers of trees on site, including some protected trees, and ask for a full tree survey with a policy presumption for tree retention.

Alton Town Council

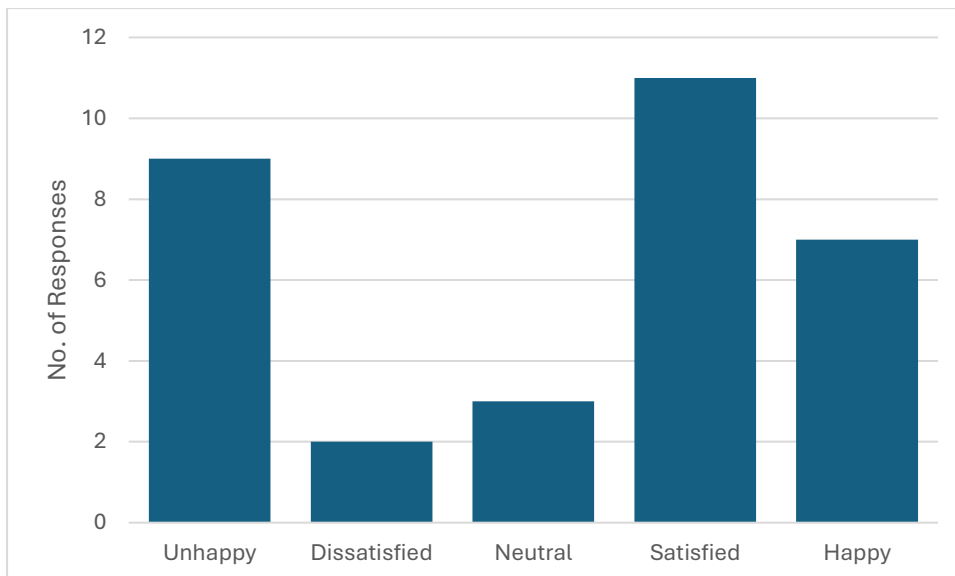
This proposal is supported by ATC and a policy is included within the ANP. However, given its location at the western end of the town, the surgery will remain largely reliant on access by car, which constrained its scope for expansion as the car park will need to be retained and potentially extended to accommodate additional patients.

With the proposal to allocate 1,700 new homes for Alton there is a question over whether the site is sufficiently able to support the additional c3,500 people, in the knowledge that Wilson Practice is already 2,787 patients oversubscribed (operating currently at 111%) and this is prior to the increase in patient numbers resulting from the current developments which have yet to be completed.

The Woodland Trust

There are significant numbers of trees on site, including some protected trees, and ask for a full tree survey with a policy presumption for tree retention.

Question: Site ALT3 Land adjacent to Alton Sewage Treatment Works - How do you feel about this site?



Question: Site ALT3 Land adjacent to Alton Sewage Treatment Works - What are your comments on this site?

Many comments received support the use of the site to be retained for waste water infrastructure purposes given its location adjacent to the existing sewerage treatment works and that there is planned residential growth in the locality which would need to utilise this facility.

Consideration must also be given to prevention and dissipation of odour whether this is screened with a shelter belt or burnt off, if the site is retained for sewerage treatment.

Alton TC, Fours Marks and Medstead PC and Binsted PC object to the site being allocated for generic employment purposes on the basis that there is no need for further employment land, but that it should be retained for sewerage treatment purposes.

Thames Water (site land owner and promoter) support the allocation for general industrial/storage/warehousing commenting that the land is currently retained operational land associated with Alton Sewage Treatment Works.

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure.

An infrastructure phasing plan is required to ensure the scale of development/s is needed to determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s upgrades to both the wastewater network and sewage treatment infrastructure.

Sensible extension to the existing industrial area

Some representations suggest alternative uses for the site including residential/affordable housing.

Suggest the site is used for a new industrial green and food waste processing centre.

Environment Agency comment that the site has a history of history of land contamination; surface and/or groundwater flooding and that there is a principal aquifer next to the sewage treatment works.

Contamination - This site/or the vicinity of has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer and doesn't pose unacceptable risks to the water environment, a site-specific policy should ensure that a contamination investigation along with a remediation strategy and verification process is included.

Surface water /and or Groundwater Flooding - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.

HCC as lead flood authority comments that there is no evidence within the Level 2 SFRA showing the land take for each site and it is not clear how the conclusions of acceptability within the Level 2 SFRA has been arrived at.

HCC comments that the site lies directly adjacent to the safeguarded Alton Wastewater Treatment Works and falls within the safeguarded buffer zones of Waterbrook Road Concrete Batching Plant – this needs to be shown as a constraint for the site and inform the amount and type of development that would be appropriate.

HCC as Highway Authority expects proposals for new development to be guided by the principles and policies contained in LTP4 and related guidance. There is a reduced focus on junction capacity improvements within the approach of LTP4. Applicants should be required to mitigate the transport impacts of the development through appropriate measures both on and off site, including via developer contributions.

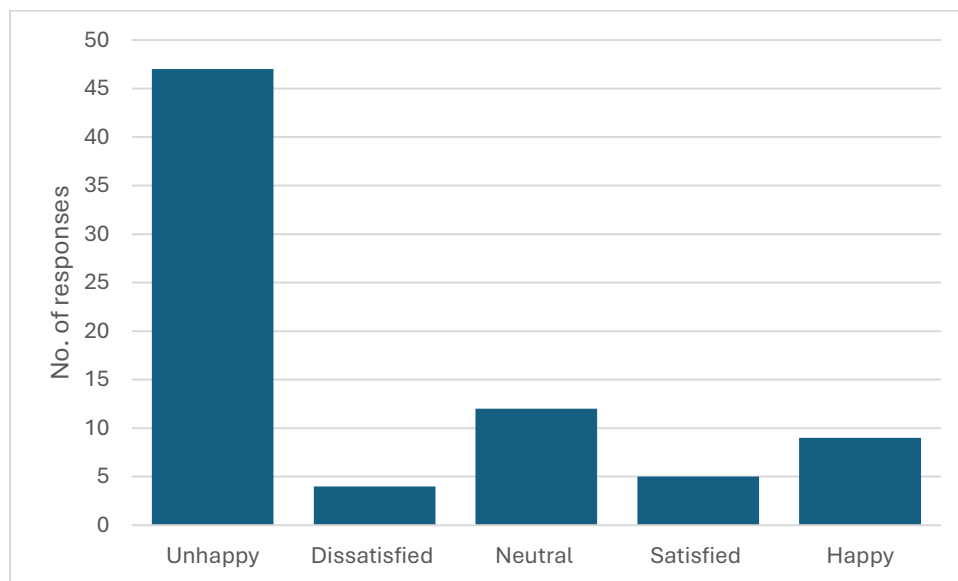
Query suitability of road access for HGV's and delivery vehicles.

DIO - RAF Odiham Height and birdstrike safeguarding zones - development exceeding 91.4m high will trigger consultation requirement + any development that creates an attractive environment for flocking bird species

Historic England – no comment

Site promoter – Chawton Park Farm - proximity of this site to the housing allocation at Neatham Manor given potential noise and smell emissions, make the Neatham Manor site unsuitable for residential development, promote Chawton Park Farm as an alternative site for large scale residential development in this area.

Question: Site ALT4 Land at Whitedown Lane, Alton - How do you feel about this site?



Question: Site ALT4 Land at Whitedown Lane, Alton - What are your comments on this site?

Some support for this proposal;

- Accessible to the main road into Basingstoke so will lend itself to commuters who will hopefully support the services, shops and facilities in Alton
- Close enough to the town centre so residents can stroll into town rather than add to the traffic passing through the town centre.
- Adjacent to another development that is functioning well

- Plenty land available
- Infrastructure available
- Perfect/logical natural infill and expansion
- Its impact on the local landscape would be the least given it is tucked more away in a corner and heavily screened by trees / woodland to the southern edges
- Reasonable location provided that there is appropriate road access, River Wey is protected and flood risk mitigated and that there are good, safe cycle and pedestrian routes to link with other areas of the town
- There is an urgent need for housing, especially affordable housing. Need to build communities though, not just housing.

However, many comments objecting and raising concerns in relation to the following topics;

Adverse impact on Beech

This site is actually within Beech parish. The proposal will have a negative impact on Beech, it will cause a loss of identity for Beech, and erode the gap between Alton and Beech. This gap should be preserved. The gap is identified in the Beech Neighbourhood Plan. The Beech Neighbourhood Plan consultation was clearly in favour of the Alton Beech gap – this proposal is against the spirit of the Neighbourhood Plan. This is too much of a western extension of Alton.

Density

The proposed number of homes is too high (90). The density needs to be much lower, with a very significant open field/open woodland buffer between the development and the existing woodland.

The proposed site

This site should be considered together with the one opposite it, rather than them being separate allocations.

This proposed development will form an island of development separated from the rest of Alton by woodland and the road network which will make residents feel removed from the town.

Location

This site is too far out of town for people to walk, with no nearby services.

This location creates excessive spread of development. This site in combination with the site to the north of Basingstoke road are significantly moving the boundary of Alton creating a corridor of development that will negatively affect the arrival into Alton from the North which is currently a gentle introduction through rolling farmland and woodland. The site is part of the natural setting and entrance to Alton.

Flood risk

Development will increase the risk of flooding on the A339, by increasing run off. The main road is already subject to flooding from surface water. The loss of plants and trees would result in water being funnelled into drains that are already over capacity.

The land slopes down to road with regular flooding. The land is catchment for the River Wey and should be protected.

Character

Adverse impact on character of area; rural character would be lost.

The site borders much used footpaths into woods and Beech.

Landscape

The development will have an adverse impact on landscape.

Situated on a rising site will have a material negative visual impact on the view of the woods when approaching from Basingstoke. It will also have a negative impact on the very many users of this woodland area as it will materially alter the landscape view from the woods across the fields to the hills on the other side of the A339. It is one of the view easily accessible woodlands from Alton on foot and the construction of houses in this area will significantly impact the many current and potential future users.

The proposal to create another junction would be damaging to the landscape, presenting a very ugly entrance to the town.

Environment (Ancient Woodland)

Considerable concern about the impact of development on ancient woodland / Ackender woods – which needs to be preserved. There are deer in the woods. The fields are integral to the habitat value and resilience of the Ackender woods. With the current new builds in Chawton Park Road it creates a pincer movement on these woods! As a result it will become a dormant wood without wildlife. The proposed development will overly encroach on the very scenic wooded area surrounding footpaths up the hill towards Chawton and Beech woods - this will be a loss of amenity for both Alton and Beech.

Comment from Forestry England;

The land at Whitedown Lane, Alton is immediately adjacent to woodland managed by Forestry England. The woodland at this location is classed as a Plantation on an Ancient Woodland Site (PAWS). We strongly encourage you to consider a minimum 50m buffer zone around the boundary of proposed development, as well as extra habitat connectivity throughout development sites, as an absolute minimum in order to ameliorate any future negative edge effects (i.e. noise pollution, light pollution, diffuse air pollutants etc.) on our neighbouring land. It is important to reiterate the fundamental purpose for buffer zones is the protection of priority habitats. Therefore these buffer zones should be designed accordingly, with appropriate planting of semi-natural habitats, in order to contribute to wider ecological networks. Subsequently, it is inappropriate for buffers to be utilised for alternative purposes i.e. for walking or cycle trails serving the development, as this can harm habitats through potential littering and trampling. The purpose of the buffer is to safeguard ecological sustainability and therefore it should not have a dual purpose. Furthermore, any green infrastructure provided by the development should be in addition to that of the ecological buffer.

The buffer area must be wide enough to protect the existing and future ecological features and to facilitate the absorption of additional recreational pressure from residents once the proposed housing development have achieved full build-out. The preferred approach is to create new habitat, including native woodland, around existing ancient woodland and linking to nearby woodland sites. This will help reverse the historic fragmentation of this important habitat. The consequent increase in ecological connectivity between areas of ancient woodland will enable the creation of resilient landscapes into the future and help to mitigate climate change.

Environment (cont.)

The proposed development would cause damage to; wildlife, habitats, countryside, ancient woodland, rare chalk stream.

The proposed development would have an adverse impact on air quality, and cause light pollution in a currently dark area.

Loss of beautiful fields which create a gateway to Alton / loss of green space. There are many beautiful Hawthorn Trees along the A339 Basingstoke Road and this is part of the rural setting and gateway to Alton. The proposal encroaches into one of the few open spaces available easily accessible on foot from Alton.

There is concern about the impact of development on the chalk stream (rare). The River Wey is a chalk stream and as such a rare environment and ecosystem. The environmental testing carried out monthly is already showing increased levels of phosphate in the water - any increase in building will only increase that and will destroy a key part of the local and British environment.

Loss of farming environment – the site is good arable land.

Conflict between proposed development and other policies; building on greenfields means won't achieve 10% BNG, building on greenfield is contrary to the Councils climate change commitments

Concern about groundwater; groundwater issues are present and the area is within a water protection zone.

There should be a buffer between development and countryside.

Design and layout

Any development should be of a high standard of design. Houses do need to be sympathetically designed so they continue to blend with the character of Alton. The houses on the site of New Odiham Road are some of the most aesthetically pleasing designs in the area.

Comment from Forestry England;

The design and layout of the development site is extremely important when considering the protection of neighbouring ancient woodland and other ecosystems. If residential properties within the development are immediately backing on to the buffer zones or woodland edges, it brings the potential for undesirable garden waste and debris to be deposited on sensitive habitats. This can subsequently lead to the potential risk of non-native invasive species colonisation, as well as unlawful access and encroachment on to the buffer zones over time. Therefore an appropriate land use layout, as well as an adequate management plan, for the development of the areas adjacent to sensitive sites or within close proximity to woodland edges, is essential to minimise the potential risk of increased pollution, littering and further detrimental impacts, such as root damage due to soil compaction or even encroachment on sensitive areas.

Urban, transport and construction activities are also all acute sources of pollution which can bring adverse effects to the ecology and water quality of many catchments and surrounding land, more specifically ancient woodland sites. Therefore significant attention and reference should be made to the layout of the development with regards to the location of access points, green infrastructure and the road network within the development in order to minimise these risks to the neighbouring sensitive ecosystems. These considerations need to be taken into account not just for after the development has achieved full build-out, but also during the construction phase.

Access

There is poor access to the site.

Infrastructure

Many comments raise concerns about insufficient infrastructure to support the number of homes proposed. Comments include reference to the following;

Basingstoke Road already too busy; dangerous road; adverse impact on roads and congestion; the junction must be significantly upgraded.

Insufficient schools, health services etc.

Additional recreation resource

Comment from Forestry England

A financially sustainable visitor management plan may, in the right circumstances, help to further mitigate against the effects of elevated levels of visitation on the adjacent woodland. However, this could be overly optimistic in the absence of:

- An appropriate ecological buffer as defined above.
- A guaranteed additional resource to improve visitor infrastructure and interpretation i.e. surfaced access trails, pedestrian bridges over watercourses, interpretation and managed access points, particularly where ancient woodland or PAWS are present.

We remain concerned about the potential impact that additional recreational pressure will have on priority habitats and on ancient woodland soils if appropriate mitigation is not put in place. An agreed financially sustainable visitor management plan should be considered and we are keen to be part of the discussions to accommodate green infrastructure to include interpretation and education, together with provision of adequate ecological buffer zones.

The plan should include, but not be limited to, identifying the current recreational infrastructure in place and outlining proposals to provide for the increased pressure from activities such as local dog walking, walking, cycling and informal forest activities, which the large development sites will bring. It should explore opportunities for investment into both existing and/or new infrastructure within the woodland, recognising that new and improved infrastructure will also create additional on-going management costs. Forestry England are therefore open to discussing different avenues of investment in-perpetuity in order to respond to the increased visitation pressure of the development and enable us to continue to sustainably manage our woodland in the future.

Such, proposals must also encourage public recreation away from ecologically sensitive areas e.g. Site of Alternative Natural Green Space (SANG), in order to enable biodiversity conservation, and take into consideration the safety requirements of ongoing forestry management activities, such as harvesting operations. It is important to recognise that these areas of the nations public forest are working forests and remain involved with the sustainable production of timber, which provides an extremely valuable source of revenue for Forestry England. Taking this into consideration, the creation of any visitor management plan will involve detailed discussions with developers and so we ask for a commitment to engaging and working closely with ourselves (Forestry England) in order to incorporate further adjustments to the outline proposal if appropriate. This could possibly enable the agreement of reasonable mitigation measures for increased visitor pressure and also for further site specific requirements to be met in the future.

General comments

Development should be focussed on brownfield land, this is what the Government has said. Should not build on greenfield land.

There has already been too much new housing in Alton. This proposal is unsustainable over development of Alton. Alton is completely built up.

Oppose Alton being classified as Tier 1 in the Settlement Hierarchy.

Preference for smaller sites.

No more housing is needed.

The Council needs to lobby the Government with the assistance of Damian Hinds to argue that the SDNP distorts the housing numbers required and that East Hants has already delivered its housing number quota.

There should be more housing in Petersfield.

The Defence Infrastructure Organisation has responded in relation to the RAF Odiham height and bird strike safeguarding zones. Development exceeding 91.4m high will trigger consultation requirements and might result in the creation of attractant environments for large and flocking bird species hazardous to aviation.

Natural England notes the site is located in source protection zone 3 and is susceptible to surface water/and or ground water flooding.

HCC Highways suggest that further feasibility work is required to determine where vehicular access for this site can be achieved off the A339 Basingstoke Road. Given the level differences between the site and the public highway at the A339/B3349 junction, the Local Highway Authority is uncertain whether an access can be achieved here. Additionally, an improved ped/cycle/active travel crossing facility must be provided on Pertuis Avenue where existing bridleway crosses the A339, with the provision of LTN01/20 compliant infrastructure connecting with Highridge/Whitedown Lane. An upgrade of the existing bridleway to the west of Pertuis Avenue will also be necessary.

It will be necessary to reduce severance caused by the A339 and B3349 through new active travel crossings and dedicated route infrastructure (to enable a reduction in local trips needing to be made by private vehicle).

In respect of walking and cycling infrastructure requirements, HCC has stated that proposals would need to be supported by off-site contributions towards funding emerging Local Cycling & Walking Infrastructure Plan (LCWIP) network proposals.

Access opportunities include combining access and the A339/B3349 junction. Off-site contributions would also be required to mitigate impacts on the PROW network.

Historic England recommends liaison with the Council's archaeological adviser to ensure the archaeological potential of the site has been given adequate consideration, noting the proximity of Roman finds on the Historic Environment Record.

Thames Water do not envisage infrastructure concerns regarding wastewater networks in relation to this development.

Alton Town Council has highlighted that site access would require a new arm to any new roundabout on the A339. There is also a need for improvements to the surrounding area for active travel routes into the town along the A339 and the installation of a crossing point.

Beech Parish Council strongly objects to the proposed site allocation as the site lies within the Beech Neighbourhood Plan Local Gap. Development of this area of land would create coalescence with Alton. It would set a precedent for future housing allocations and would cause harm to the landscape character.

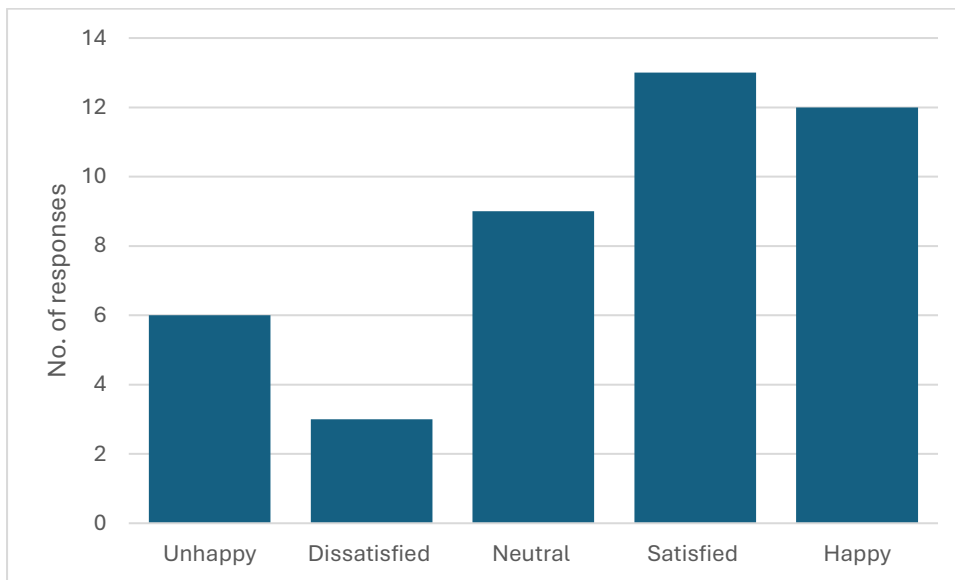
Alton Ramblers Group has expressed that link paths to the PROW network would be required and need to be maintained for access at all times.

The Woodland Trust notes that the site is adjacent to an area of ancient woodland on the southern boundary, Alexandra Wood and have requested that should this site be allocated,

that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

Nexus Planning on behalf of Vortal Homes wholly support the draft allocation of the site and recommend that the housing numbers are increased from 90 dwellings to accommodate a greater quantum of dwellings on site. It is suggested that the provision of a T-junction would constitute an appropriate access arrangement as opposed to a roundabout.

Question: Site ALT5 – Land at Travis Perkins (Mounters Lodge part) - How do you feel about this site?



Question: Site ALT5 Land at Travis Perkins (Mounters Lodge part) - What are your comments on this site?

Some support for this proposal, particularly noting the use of brownfield land. Comments noting that it is an appropriate and accessible location, low impact from this development, brownfield is preferable, and support for brownfield development. Comment stating there is an urgent need for housing, and support for CIL towards Chawton Park Surgery.

Those objecting to the proposal raised issues about access, traffic, noise, overlooking, adverse impact on surroundings, negative impact on local services, and over development of the area. The density proposed is too high, and no more housing is needed. It is still a greenfield site.

The narrow land (Mounters Lane) is not suitable as an entrance either due to it being narrow, having no footpaths for pedestrian / equestrian traffic and providing no options for turning.

Any overflow parking to the Winchester Road would make an already difficult situation much worse as no alternative parking exists, since there is only one road here and its already fairly congested.

Any additional parking would then make visibility at any new junction dangerous since there would be no visibility, plus this would adversely impact lost (often large) vehicles trying to turn around as they would have to reverse up the entire length of the road (as already happens fairly frequently).

Need to ensure road access improvements do not excessively disturb existing biodiversity and make good priority provision for pedestrians to use the subway to Chawton.

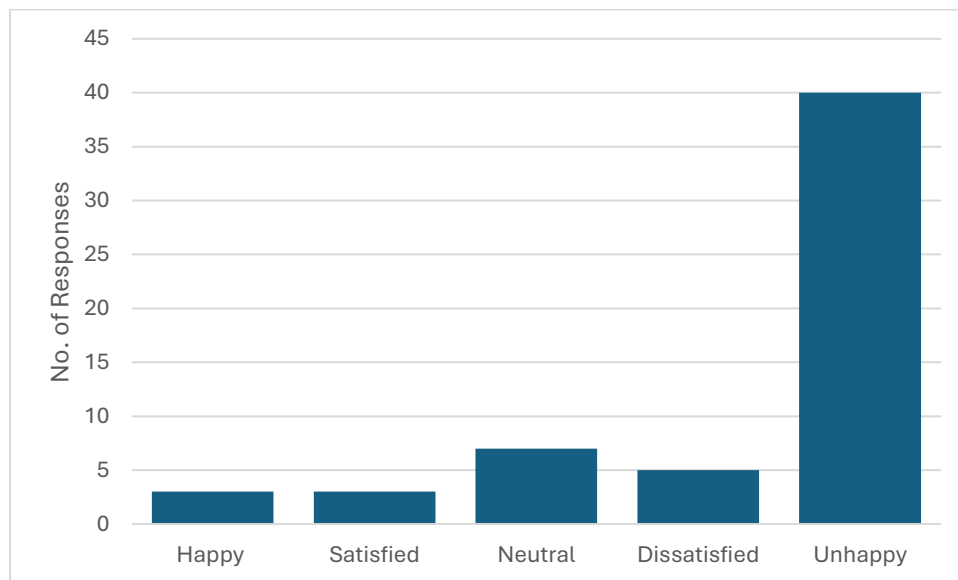
The Defence Infrastructure Organisation has responded in relation to the RAF Odiham height and bird strike safeguarding zones. Development exceeding 91.4m high will trigger consultation requirement and might result in the creation of attractant environments for large and flocking bird species hazardous to aviation.

Thames Water do not envisage infrastructure concerns regarding wastewater needs.

Alton Town Council raised no objection raised to planning application 59923 (response submitted 25th October 2023) for this site. A decision is pending.

The Woodland Trust state that there are significant numbers of trees on site, including some protected trees, and request that a full tree survey with a policy presumption for tree retention.

Question: Site ALT6 Land at Wilsom Road, Alton - How do you feel about this site?



Question: Site ALT6 Land at Wilsom Road, Alton - What are your comments on this site?

Alton TC - question if the site is developable and deliverable to retain in the Local Plan.

The land at Wilson Road is a prime site for more business and employment . It enjoys a close proximity to the Alton by pass and new employment opportunities in Alton will help to

provide jobs for residents who choose to move to Alton, so improving the revenue for local business owners.

Good use for extra employment opportunities in an infill area close to other business areas

There are already vacant employment buildings in the area - how will creating more help?

Employment premises on the market in Alton is about 100,000sqft industrial/warehouse and 50,000sqft office space. These premises are built, empty, and ready for letting – there is no need for more.

Question the need for more employment land, particularly with land at Lynch Hill allocated,

If really needed, the only acceptable employment would be single storey Class B1 office/admin buildings

This site is not suitable for an extension to the existing business park;

No justification for this flood meadow to be used and incorporated into Riverside/Omega Park

Whilst the site is sensibly located for employment the high flood risk and the potential for major damage to a chalk stream should prevent its development;

Caker Stream runs through this site and a large area of the land is subject to flooding. Flood risk extends downstream to the Omega Park Industrial site, which has flooded this winter.

Object - proposed site is greenfield land with potential to impact the eco systems and quality of the River Wey

Delete this site from the local plan on the basis that it floods, has high biodiversity interest, difficult vehicular access and forms a gateway to the national park and should remain undeveloped.

Given the known flooding and biodiversity interests on the site and adjacent the site should be retained for biodiversity enhancement and opened up to the public.

With the known constraints on the site only a small proportion would be available for development – is this viable?

Site is a gateway to South Downs National Park and should not be built on.

Site lies within a residential area opposite existing dwellings and others under construction

Site actually falls in East Worldham Parish not Alton.

Site lies within Flood risk zones 2 and 3

The stream running through the site will be polluted by water run off from any proposed development

Environment Agency - disagree with SFRA - Exceptions test has not been passed and have concerns about the deliverability of the site - due to no detailed flood modelling being available - site should be considered as functional flood plain see PPG. Level 2 SFRA does not consider climate change and extent of risk may be greater than shown.

Development should avoid Flood zone 2 and 3 and main river defences.

Fails to identify Caker Stream which runs through the middle of the site - needs at least 10 metre buffer either side of the watercourse - request commitment to restore Caker Stream as part of the proposal.

Request site specific policy for site specific FRA - development should avoid Flood zone 2 and 3 and 10m buffer zone distance needs to be referred to in policy.

Is a highly constrained site and may need detailed modelling

See advice from HCC as lead flood authority for surface and groundwater flooding on the site.

HCC as Lead Flood Authority - the LLFA notes that information has not been provided within the Level 2 SFRA showing the land take for each of the sites assessed and it is not clear how the conclusions of acceptability within the Level 2 SFRA has been arrived at.

Reference to on-site drainage is useful.

Applicants need to ensure that the drainage solution is acceptable to the LLFA.

Development of this site would create adverse landscape impacts;

Site is full of wildlife and biodiversity interests— known as Caker Stream Meadow

Site is of high biodiversity interest, including herons, otters, birds of prey, slow worms etc

Hampshire and Isle of Wight Wildlife Trust – concern over proximity of the site to the river.

Site should be retained in its existing form and made publicly accessible

Thames Water - the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed development will have on the wastewater infrastructure.

Details for each sites are required in terms of location, type and scale of development together with the anticipated timing of development.

Thames Water would welcome the opportunity to meet to discuss the wastewater infrastructure needs relating to the Local Plan

HCC - mineral safeguarding is a strategic constraint to new development, and therefore, request that the Minerals Safeguarding Area is added to the maps.

Access to the site is hazardous

HCC as Highway Authority - Hampshire County Council's Local Transport Plan 4 (LTP4) marks a significant shift in how planning of our transport networks and local streets should be undertaken. The Highway Authority expects proposals for new development to be guided by the principles and policies contained in LTP4 and related guidance. There is a reduced focus on junction capacity improvements within the approach of LTP4. Applicants should be required to mitigate the transport impacts of the development through appropriate measures on and off site.

To enable safe pedestrian access to the site for visitors and employees the development will need to facilitate new footway provision, and an informal pedestrian crossing facility on Wilsom Road in vicinity of the site. To improve road safety and facilitate the provision of a

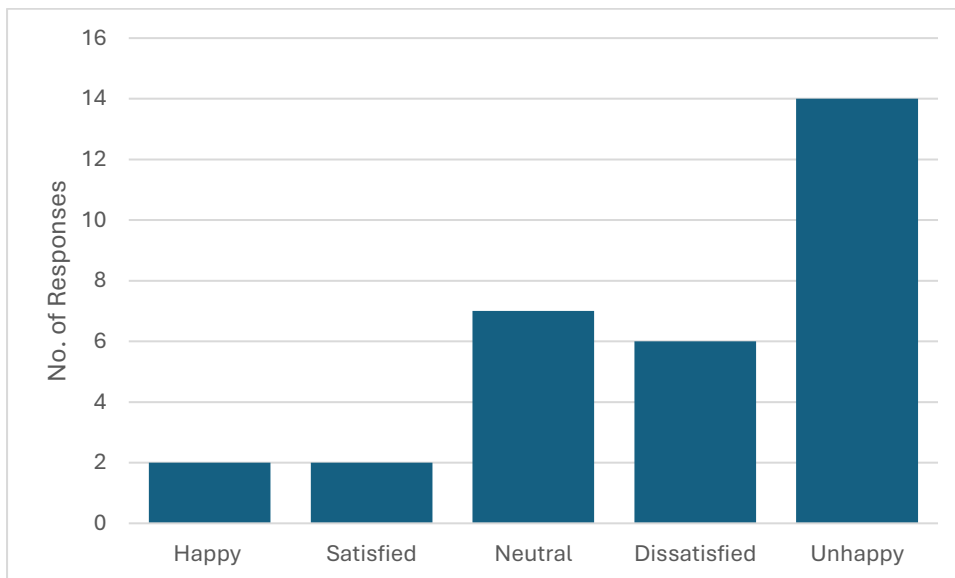
new vehicular access on this section of Wilsom Road the 40mph speed limit should be reviewed.

The Hangers Way long distance path runs along the northern boundary of the site via a PROW. The development will need to facilitate the provision of a high-quality path appropriate for use by pedestrians and potentially cyclists (either upgrade of the existing PROW or provision of new route through the site) over the River Wey and under the A31 between Wilson Road and Neatham Down that is aligned with the route of the Hangers Way

DIO - RAF Odiham Height and birdstrike safeguarding zones - development exceeding 91.4m high will trigger consultation requirement + any development that creates an attractive environment for flocking bird species

Historic England – no comment.

Question: Site ALT7 – Land at Lynch Hill, Alton - How do you feel about this site?



Question: Site ALT7 – Land at Lynch Hill, Alton - What are your comments on this site?

Alton Town Council, Binsted PC request links with ALT8 and the need for the privately owned track to be available for public access

Binsted PC - This site has a complex history, with planning discussions spanning many years. BPC has made its views known through responses to previous planning applications. There were two outline consents for the site, (49776/003 and 49776/004), an outstanding reserved matters application for the whole of the site (49776/004) as well as an outstanding reserved matters application for site access for pedestrian, cycle, and vehicular access to the site from Waterbrook Road (49776/005).

Nexus Planning obo Tanvale Ltd promoting land at Lynch Hill, Alton - Tanvale Ltd broadly support the Council's vision and objectives to deliver sufficient housing and employment development on sites which provide sustainable and active travel options along with maintaining and improving the quality of built and natural environments. However, in delivering on these objectives in a manner consistent with the Framework, Tanvale Ltd consider that the Council should:

- Ensure the deliverability of the housing allocations
- Take a proactive approach to identifying sites for later living
- Take a broader view of employment and how the need for jobs can be met across a range of sectors
- Ensuring that the extent of employment allocations reflecting likely requirements, focussing investment and delivery
- Ensuring the deliverability of its employment allocations through considering the appropriate mix of development
- Ensuring site allocations are located to protect and enhance valued and high quality landscapes
- Locate development in sustainable, walkable locations and to make use, where possible of existing infrastructure in considering how the Site can best serve the Draft Plan objectives.

Tanvale Ltd would question the extent of allocated employment land at ATL7 given the Council's seemingly sufficient supply of employment land - therefore need to consider alternative uses for the site. Tanvale Ltd agrees with the Council in allocating flexible employment use and supports the commercial aspect of this allocation. However, Tanvale Ltd strongly urges the Council to further increase the flexibility of ALT7, so that the Site can provide meaningful employment opportunities and assist those sectors which are currently underperforming as well as those which currently benefit from a strong presence within the district.

It is considered appropriate to review the potential contribution of Lynch Hill, a largely already committed site, to meeting the development needs of the district:-

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

Various other housing site promoters comment that their sites could also accommodate employment provision.

There are already too many empty office buildings and warehouse type buildings in Alton that could be redeveloped into better employment accommodation. Any industrial development would require major screening with trees/planting to soften the likely unsightly buildings/warehouses that would be seen driving along the A31 and also from various viewpoints in Alton itself detracting from the wider countryside and South Downs landscape beyond.

If housing is such an issue, why not incorporate some into this plot instead of building on Neatham Downs. -although would need to consider the traffic impacts on Montecchio Way.

Lynch Hill is historic hence the Mediaeval lynchets which are a historic landscape feature, it forms one of the 7 hills of Alton used by walkers and ramblers.

Where it may be possible to extend the appallingly ugly commercial development in Water Lane extreme care is required to adequately screen commercial development both from Water Lane and the bypass.

Need to retain Grade 3 agricultural land.

This is a large exposed area, is there actually demand for such a large scale industrial estate? Lots of units in the existing industrial parts of town seem empty. Will there be planting and trees to hide the likely ugly generic warehouses or will they be of a high quality design?

Increasing the productivity of existing developed land should be prioritised before building more spaces.

Completely disagree with this. Central government wants focus to shift from green space to brownfield sites, this proposal will decimate our green land vital for biodiversity with built development.

As a site for consideration, it looks to be favourable compared to many - and while it is still greenfield, it is 'infill' between the town and A31 'boundary' so an example of where one might expand the town's infrastructure whilst still overall containing overall 'urban sprawl'.

That said, as employment / 'industrial' development, the size/scale of buildings could well be insensitive and intrusive.

Given the change in working practices since Covid, is it still deemed necessary for building this employment area. Could this area be adapted to include some residential provision near administrative outlets.

Look at empty units first

Why are we choosing to build on greenfield site when the existing warehousing and employment zones are not fully utilised? We should be regenerating brownfield sites, not taking the easy option of building on greenfield sites

This site and all the other designated sites in an around Alton should not proceed due to the fact the town has already been overdeveloped having already taken on 5 large developments some of which have not yet been completed. The infrastructure simply cannot cope with significantly increased traffic, pressure on local GP surgeries, schools and the utilities. This is also a green field site which goes against Government guidelines in not developing areas on green space. With the council allegedly committing to their carbon responsibility how can building more homes which will generating hundreds more cars on local roads be anything other than a CO2 hazard.

Environment Agency - disagree with SFRA - Exceptions test has not been passed and have concerns about the deliverability of the site - due to no detailed flood modelling being available - site should be considered as functional flood plain see PPG.

Level 2 SFRA does not consider climate change and extent of risk may be greater than shown.

There is evidence of historical Flooding at this site.

Request site specific policy for site specific FRA - development should avoid Flood zone 2 and 3 and 10m buffer zone distance needs to be referred to in policy.

See advice from HCC as lead flood authority for surface and groundwater flooding on the site.

HCC as Lead Flood Authority - the LLFA notes that information has not been provided within the Level 2 SFRA showing the land take for each of the sites assessed and it is not clear how the conclusions of acceptability within the Level 2 SFRA has been arrived at.

Current government guidance recommends that Level 2 SFRA's are triggered by all sources of flooding. The LLFA has identified several sites which would benefit from inclusion in the level 2 SFRA, including, sites where there is a surface water overland flow routes running through the middle of the site.

Infrastructure Requirements- Reference to on-site drainage is useful. The LLFA have identified several sites which are completely reliant on infiltration to drain - Applicants need to ensure that the drainage solution is acceptable to the LLFA

Hampshire and Isle of Wight Wildlife Trust - concern over proximity of the site to rivers

In terms of visual impact at n point should be the crest of this hill which should not be compromised by commercial or urban development. Flood lit sites would also be detrimental to the night sky and biodiversity. Water Lane contains some stunning historic and listed buildings which have been utterly ruined by ugly modern development with no thought given to its siting or impact in terms of the historic landscape. Water lane is also home to Northern Way and otter population which passes through again this needs to be conserved to ensure any hope of a 10 % net gain in Biodiversity. This hill should ideally be protected from a landscape point of view and opened up for walkers and countryside recreation being so close to the town and opposite the proposed Neatham Manor urban extension.

The land is rich in biodiversity and would not be able to achieve a biodiversity net gain of 10%

Loss of open land

Detrimental impact on the skyline

This is a beautiful piece of woodland

Object on the basis of - adverse landscape and visual effect as this is a hill and anything build on it will be going over the skyline; loss of biodiversity and impact on wildlife eg skylarks .

Thames Water The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to

ensure development does not outpace delivery of essential network upgrades to accommodate future development/s

HCC - The mineral safeguarding is a strategic constraint to new development, and therefore, request that the Minerals Safeguarding Area is added to the maps.

The Hampshire Minerals and Waste Plan safeguards potential mineral resources through Policy 15 (Safeguarding – mineral resources). Where a potential development site lies within the Mineral Safeguarding Area (MSA) and is over 3 hectares in size, the site should be assessed for the prior extraction of the underlying minerals.

Request following text is added: ‘Applicants should aim to maximise the prior extraction of mineral resources on this site in line with the policies of the Hampshire Minerals and Waste Plan. A Mineral Resource Assessment is required to be submitted to the Minerals and Waste Planning Authority as part of any application to develop this site.’

HCC – Highways Authority - Hampshire County Council’s Local Transport Plan 4 (LTP4) marks a significant shift in how planning of our transport networks and local streets should be undertaken.

The Highway Authority expects proposals for new development to be guided by the principles and policies contained in LTP4 and related guidance. There is a reduced focus on junction capacity improvements within the approach of LTP4. Applicants should be required to mitigate the transport impacts of the development through appropriate measures both on and off site, including via developer contributions.

Provision of a new access via Montecchio Way is not in accordance with Policy DM2 of LTP4 and a preferred access arrangement would be via Waterbrook Road. However, this is an unadopted road with significant on street parking that would need to be managed.

There is a new signalised junction between Mill Lane and Montecchio Lane. The proximity of the two junctions needs to be assessed and further modelling work is required.

Development will need to facilitate a safe and dedicated active travel crossing on Mill Lane and improvements to the junction of Newmans Lane/Anstey Mill Lane to connect with emerging LCWIP network and allow safe access by active travel modes. Further information is also required to demonstrate that vehicular access to Waterbrook Road is achievable.

Request that the following wording, or similar, be added:

‘Applicants should provide evidence to demonstrate how the site can be safely accessed for all modes, in line with the policies contained within LTP4’

Proposed new access from Montecchio Way would cause unacceptable traffic problems at the east approaches to Alton from the A31 with existing traffic lights at Holybourne and Mill Lane. Routes to the development via Waterbrook Lane should be considered.

The site abuts the Neatham Down strategic site and requirements to facilitate linkages between the developments to facilitate sustainable access should be set out.

There is reference to the private track which runs through the site, connecting Golden Chair Farm with Waterbrook Road, which must be factored into any reserved matters decision affecting access from the site into Waterbrook Road and how the site is laid out.

It is further noted that this privately owned track which would be required to enable pedestrian and cycle access to the proposed site ALT-8; without which access to Alton would be across the A31. It is therefore vital for the delivery of both this site and consideration of ALT-8 that there is certainty in the securing of this right of way for public access.

Concern about further junctions onto Montecchio Way and traffic impacts.

Access onto Montecchio way is not safe as it is very close to roundabout on A31.

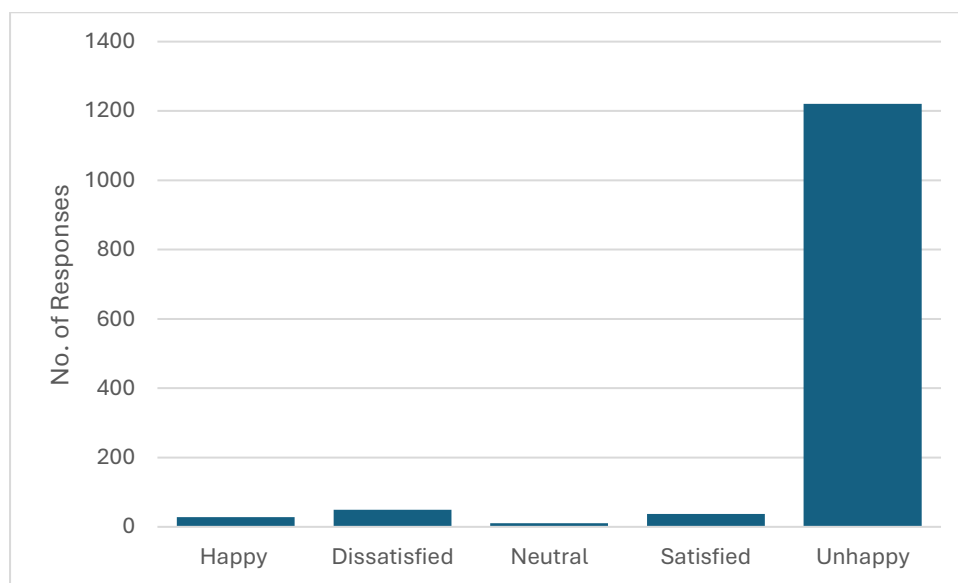
Access from Montecchio Way will clearly be a major issue - this is already heavily congested.

Only develop the site is access is not from Montecchio Way.

DIO - RAF Odiham Height and bird strike safeguarding zones - development exceeding 91.4m high will trigger consultation requirement + any development that creates an attractive environment for flocking bird species.

Historic England – no comment.

Question: Site ALT8 Land at Neatham Manor Farm, Alton - How do you feel about this site?



Question: Site ALT8 Land at Neatham Manor Farm, Alton - What are your comments on this site?

Comments of support suggesting there is infrastructure and services in Alton to support such a development. Comments noting the benefits of delivering development on a large scale, in terms of infrastructure and opportunities. Also commenting on transport options in Alton. Some comments offering comparisons in some cases between Whitehill & Bordon and Alton, and other comments comparing sites in Alton and stating this is the 'least worst option'.

Many on comments on the following topics:

Size – the site is too big and is disproportionate to the local area. Would increase Alton by varying percentages offered, overwhelming Alton.

Location – poor/wrong/unsustainable location for development. Is in Binsted Parish not Alton. Not connected to Alton.

Evidence base – lack of evidence to support the allocation and show it is deliverable.

Countryside – development will spoil the countryside, loss of green space. It will further diminish the open boundary land meaning Holybourne becomes even more contiguous with Alton.

Agricultural land – loss of prime agricultural land. Food security concerns.

Landscape - This site contributes to the landscape setting of the SDNP, adverse impact on the SDNP. The site is an important entrance to Alton. Adverse impact on the landscape.

Character – adverse impact on the character of Alton. Loss of rural character.

Heritage, Culture & Archaeology - The countryside around Alton holds historical and cultural significance – this is not being taken account of. The development would fail to conserve or enhance the historic environment but instead would represent an unwelcome intrusion on the otherwise rural setting. There are a number of archaeological sites nearby (Part of the proposed site was extensively surveyed recently when the new oil pipeline was put through).

Environment – destroy natural and ancient woodland, cause severe ecological damage. Cause loss of biodiversity. Adverse impact on the chalk stream. Cause pollution of the River Wey. Adverse impact on dark night skies.

Flood risk – increase flood risk on site and elsewhere. High flood risk area. Lack of drainage. Photos of flooding submitted.

Infrastructure – the infrastructure cannot support this amount of housing. The impact on infrastructure hasn't been properly assessed. Existing infrastructure at capacity. Considerable mention of health, education and transport (photos submitted of queuing traffic).

Amenity – increase pollution (light, air), loss of tranquillity, adverse impact on health.

Type of housing – opinions on what type of housing is needed.

Affordable housing – is not affordable. Need affordable housing. We don't have a housing crisis, we have an affordable housing crisis. Need more affordable small scale quality housing.

Contrary to policy – contrary to climate change policy, contrary to the policies/vision/objectives proposed in the plan.

Other comments;

In relation to the inclusion of Travelling Showpeople accommodation – not supported, not a suitable location. Also, query why Traveller pitches not included when high need.

In relation to alternative sites, suggestions that should build more on brownfield, focus on smaller sites, use empty properties and bring them back into use, regenerate Alton Town Centre, and other towns mentioned particularly Petersfield.

Considerable comments saying this amount of housing is not needed, with specific comments about how housing numbers are calculated, and disaggregated.

There will be no benefits to Alton residents from this development.

A lot of comments on Tiers, Binsted is not a Tier 1 parish and therefore should not be expected to double its population. No rationale for Alton being Tier 1, and the only Tier 1 settlement. The tiers are not equitable.

The proposed development is not viable, due to geology and road improvements needed.

Considerable comments focussing on Alton generally – too many homes, already over developed. SDNP is over protected.

Queries about the Local Plan process, in terms of how this site was previously included and rejected.

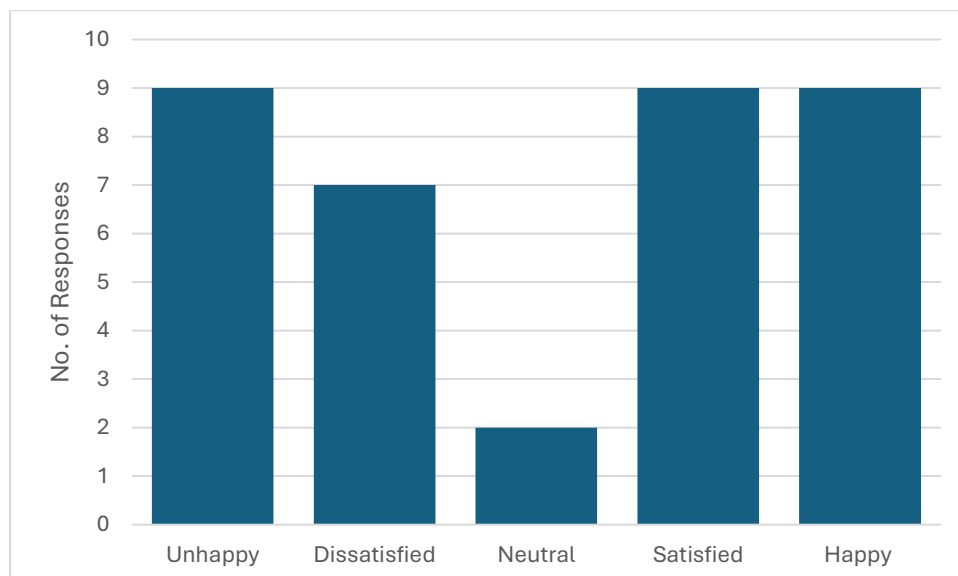
The Highway Authority is currently unable to support the allocation of ALT8 Land at Neatham Manor Farm, Alton. Significant highways and transport issues have been identified with this site, along with a lack of evidence of a genuine choice of transport modes, and no transport assessment to review. The Highway Authority is currently unable to support the allocation of ALT8 Land at Neatham Manor Farm, and has concerns surrounding the accessibility of the site for all modes. The site is in relative proximity to Alton, but it is physically severed by the A31 meaning it is disconnected from the town.

The SDNPA requests that EHDC revisit the proposed strategic allocation and how it can meet the requirements to conserve and enhance the SDNP and its setting. The development quantum should be reduced.

The response from the representative of Neatham Manor Farm at the time, as listed in the contents page for the Industry Professional reps – Masker Architects regarding Neatham Down (LAA sites BIN009 BIN010 BIN011, draft Local Plan site ALT8), confirming the availability of the site and further work planned.

Many Industry Professional reps critique the site, querying it's deliverability, particularly Savills on behalf of Harrow Estates regarding Chawton Park (LAA site CHA007).

Question: Site W&B1 Whitehill & Bordon Town Centre Intensification - How do you feel about this site?



Question: Site W&B1 Whitehill & Bordon Town Centre Intensification - What are your comments on this site?

Some residents support the policy in general and consider that the redevelopment of the existing brownfield sites is sustainable and accessible to local service, facilities and green spaces. One resident considers that the proposal would allow for infrastructure and community growth and aligns with the policies included in the Draft Local Plan.

Residents recognise the importance of ensuring that local wildlife and green networks are protected from adverse impacts. However, one comment has been received raising concern that the Local Plan does not consider the impacts of air pollution which impacts the ecological interests of the Wealden Heaths European SPA & SAC sites. It is suggested that more native trees should be planted to absorb the CO₂ and produce more oxygen, therefore resulting in a net biodiversity gain which will help cool the town.

Other residents are unhappy with that the intensification of the area and consider that the area is already overwhelmed with housing. Residents are frustrated with the lack of infrastructure to support the housing growth which was “promised”.

There are concerns about housing density being too high above the Health Hub in the new town centre and that far too many houses are being built without the supporting infrastructure.

Concern has been raised that the Draft Local Plan proposes removing yet more trees from a number of areas around Whitehill and Bordon, not least the town's attractive, wooded fringe / backdrop.

Residents have also highlighted concerns regarding the existing lack of shops, GP's and poor public transport.

Whitehill Town Council & The Whitehill & Bordon Community Party both recognise that housing increases extra economic activities such as the creation of local jobs and businesses. However, concern has been expressed that housing without the associated infrastructure, there will be a strain on local vital facilities. Concern has also been expressed that the proposed Health Hub is not yet 100% and suggest that the Draft Local Plan recognises that adequate medical facilities are provided if the Health Hub is not built. It is also suggested that there should be a requirement supporting public transport via a S106 legal agreement which is crucial for the community given that there is no train station.

Representations have been received from key statutory consultees including Hampshire County Council, in its role as the Local Highway Authority (including public rights of way), Local Education Authority, Minerals and Waste Planning Authority, Lead Local Flood Authority, and Public Health body, in support of the inclusion of minerals as a constraint HCC Minerals & Waste support the inclusion of minerals as a constraint. The representation states that the figure shows areas adjacent to Shortheath Common and to the south of Broxhead Common as new Green Infrastructure Opportunities. It is not clear how this identification of green infrastructure opportunities will function to avoid impacts of protected habitats. The County Council in respect of its countryside sites, encourage consideration of new development, and associated visitor pressures to these protected sites. Impacts on Shortheath Common and Broxhead Common may require mitigation (including for habitat enhancement and alongside PROW Connections to the Green Grid Green Loop).

Natural England acknowledges that the site falls within 5km of the Wealden Heaths SPA and SAC sites, including Shortheath Common SAC. Natural England agree that recreational

disturbance produced by these allocations on the Wealden Heaths SPA and SAC sites will need to be appropriately mitigated in accordance with Policy NBE4.

Historic England object to the proposed site allocation but welcome acknowledgement that the site includes buildings that are of local heritage value, providing a valuable and recognisable link to its previous military use. A proportionate HIA would help to inform the proposed development.

Natural England consider that any bespoke mitigation package will need to be agreed for each site and secured in perpetuity. For all site allocations located within 5km of Wealden Heaths SPA/SAC sites, mitigation will likely be necessary.

The South Downs National Park Authority (SDNPA) has raised concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat including the SPA.

They have suggested that given the scale of proposed additional development in Whitehill & Bordon, the Draft Local Plan should require development to deliver both multifunctional green infrastructure (GI) and the Bentley-Bordon old railway line for nonmotorised use (NMU). The part of the line in the SDNP is safeguarded for NMU delivery under SDLP Policy SD20. The opportunity to deliver the safeguarded route across both LPA Areas should be discussed further as a cross-boundary matter, and should be included in any future allocation and policy criteria.

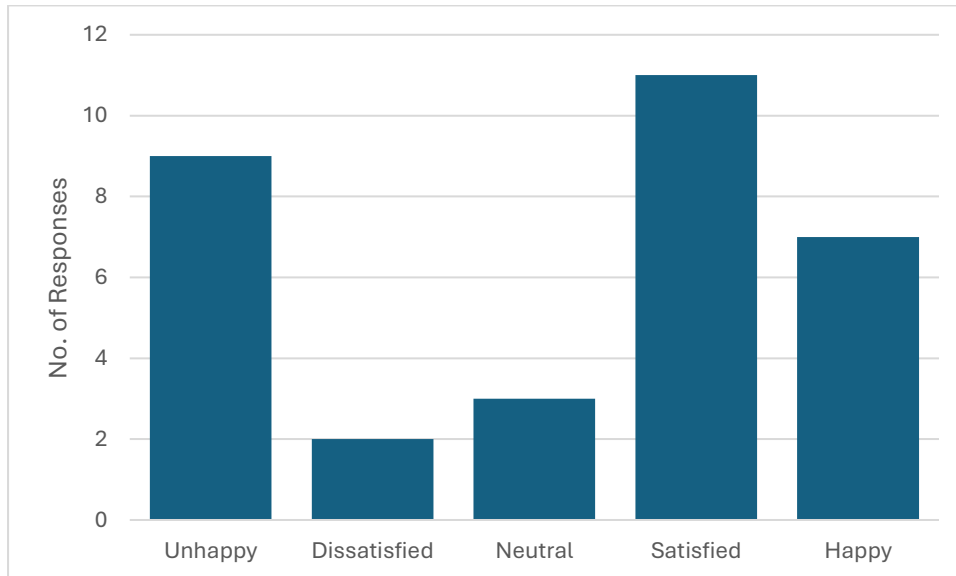
Concern has also been raised regarding the significant additional traffic that will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

The SDNPA has also raised concern regarding the significant additional traffic arising from the sites which could have potential negatives impacts on the SDNP and its setting has suggested that an assessment of SANG options will need to be prepared to ensure that any potentially adverse impact to the Wealden Heaths II SPA is sufficiently avoided or mitigated. One option could be for SANG / Off-lead zones adjacent to (but not in) the SPA (i.e., BOSC Village), but such areas would need to be investigated further and would need to be large enough to properly exercise a dog.

Avison Young (on behalf of Defence Infrastructure Organisation -DIO) and the Whitehill & Bordon Regeneration Company (WBRC) have raised objection to the wording of the text on the grounds of lack of evidence concerning infrastructure requirements.

The Defence Infrastructure Organisation have responded in relation to the RAF Odiham height and safeguarding zones. Development exceeding 91.4m high will trigger consultation requirement.

Question: Site W&B2 Land at the Former Bordon Garrison - How do you feel about this site?



Question: Site W&B2 Land at the Former Bordon Garrison - What are your comments on this site?

Representations have been received from some residents indicating that they are happy or satisfied with the proposed site allocation. Of those provided comments, residents are pleased to see that former MOD land is proposed to be used as favourably as brownfield and that the proposed development aligns with the policies in the Draft Local Plan which supports growth of the area.

Whilst some residents are generally satisfied with the proposed site allocation, some comments referenced concern that the future amenities provided by the new town centre and future employment opportunities locally may not be sufficient to prevent commuter traffic and more journeys further afield for shopping and leisure purposes.

The development of the area is welcomed to enable provision of local amenities. However, SEN provision is lacking along with difficulties accessing local GP's and hospital.

The opening up of the Oxney Drain for a potential landscape feature to promote biodiversity and landscaping is welcomed. Support is also received for Sustainable Open Drainage Systems (SuDs) and native tree screening, tree lined walks and cycle ways. It has been suggested that part of the site nearest to Templar's Way (the relief road) is retained as long as possible for commercial development.

One comment welcomes the opportunity to develop in a most energy efficient and 'green' way which will enhance the area.

Some neutral comments received highlight the need to restrict density of housing to no more than 3 stories. Delivery of services and shops first is important.

One representation that has been received, questions whether the development would affect the views from existing housing near the Linear Park and whether there will be sufficient parking provision for the additional residents. Incorporating SuDs and permeable paving into the design of the development has been highlighted as a consideration.

Of those residents who are dissatisfied and unhappy, concerns received relate to land contamination from former military mechanical and engineering workshops and whether the site is suitable for housing. As opposed to housing, a recreational ground/park and picnic ground is far more favourable.

Several concerns suggest no more additional houses should be built. The road out of Bordon to Alton is already congested and crime is increasing within the area. There are no offices job opportunities. There should be business incentives before the construction of any additional houses.

There is concern that the retail, health and transport infrastructure has not been delivered. The new secondary school is not large enough and there are not enough qualified teachers to education the local younger population yet more housing is proposed. The area is far too densely populated and built. Local roads are unable to cope and there is a lack of public transportation which means more cars are being driven.

Whitehill Town Council & The Whitehill & Bordon Community Party both recognise that housing increases extra economic activities such as the creation of local jobs and businesses. However, concern has been expressed that housing without the associated infrastructure, there will be a strain on local vital facilities. Concern has also been expressed that the proposed Health Hub is not yet 100% and suggest that the Draft Local Plan recognises that adequate medical facilities are provided if the Health Hub is not built. It is also suggested that there should be a requirement supporting public transport via a S106 legal agreement which is crucial for the community given that there is no train station.

Representations have been received from key statutory consultees including Hampshire County Council, in its role as the Local Highway Authority (including public rights of way), Local Education Authority, Minerals and Waste Planning Authority, Lead Local Flood Authority, and Public Health body, in support of the inclusion of minerals as a constraint. The HCC representation states that the figure shows areas adjacent to Shortheath Common and to the south of Broxhead Common as new Green Infrastructure Opportunities. It is not clear how this identification of green infrastructure opportunities will function to avoid impacts of protected habitats. The County Council in respect of its countryside sites encourage consideration of new development, and associated visitor pressures to these protected sites. Impacts on Shortheath Common and Broxhead Common may require mitigation (including for habitat enhancement and alongside PROW Connections to the Green Grid Green Loop).

HCC also states that connections onto the existing Oxney Drain would be fundamental as well as connecting into the Green Grid/Green Loop. Connections across to the western side of the A325 are also key to access employment and the Hogmoor Enclosure. The development parcel would also need to be consistent with the already permitted Phase 3 in facilitating a route appropriate for the use by buses should demand require that in the future, and off-road cycling facilities north/south connecting Havannah Way to Budds Lane and Station Road.

Natural England acknowledges that the site falls within 5km of the Wealden Heaths SPA and SAC sites, including Shortheath Common SAC. Natural England agree that recreational disturbance produced by these allocations on the Wealden Heaths SPA and SAC sites will need to be appropriately mitigated in accordance with Policy NBE4

Any bespoke mitigation package will need to be agreed with Natural England for each site and secured in perpetuity. For all site allocations located within 5km of Wealden Heaths SPA/SAC sites, mitigation will likely be necessary.

Historic England object to the proposed site allocation and state that a proportionate HIA is needed to support effective place-shaping, taking into account the potential heritage

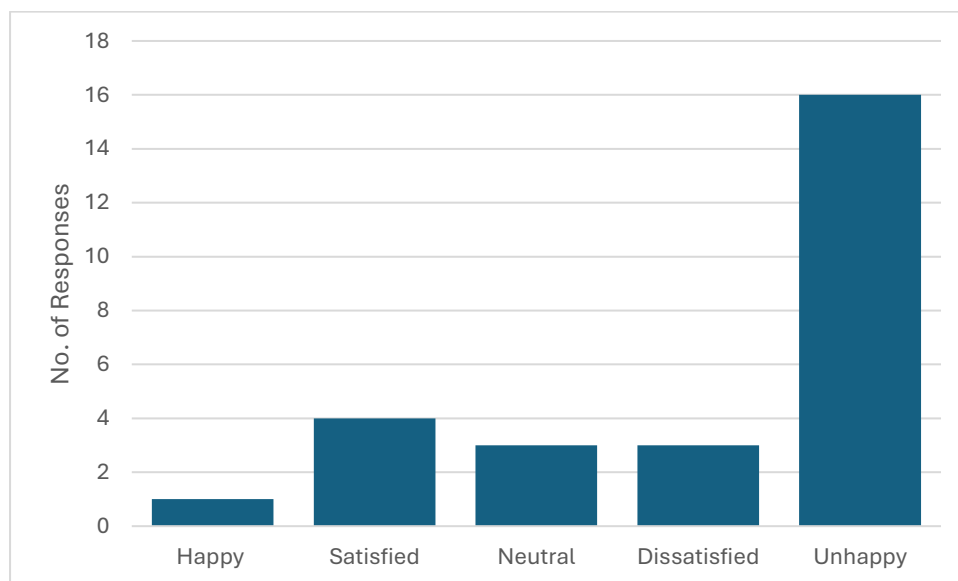
significance of structures of local importance that connect with previous military use (as above), and ensure that any impacts on the setting of nearby Scheduled Monuments are considered.

The South Downs National Park Authority (SDNPA) has raised concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat including the SPA. The SDNPA has also raised regarding the significant additional traffic arising from the sites which could have potential negatives impacts on the SDNP and its setting has suggested that an assessment of SANG options will need to be prepared to ensure that any potentially adverse impact to the Wealden Heaths II SPA is sufficiently avoided or mitigated. One option could be for SANG / Off-lead zones adjacent to (but not in) the SPA (i.e., BOSC Village), but such areas would need to be investigated further and would need to be large enough to properly exercise a dog.

The Defence Infrastructure Organisation has responded in relation to the RAF Odiham height and safeguarding zones. Development exceeding 91.4m high will trigger consultation requirement.

The Environment Agency has noted that the site lies within a source protection zone 3, principal aquifer.

Question: Site W&B3 BOSC Residential Expansion - How do you feel about this site?



Question: Site W&B3 BOSC Residential Expansion - What are your comments on this site?

The vast majority of comments raise concerns about this proposal, primarily in relation to impact on the environment. Any supportive comments were in relation to an acceptance of the overall amount of housing allocated to Whitehill & Bordon, given the context.

The proposal is not justified, as there is no need for development of this site, which is beyond the boundary of the W&B regeneration zone. Just because it has been identified as having poor quality species diversity and habitat value should not automatically make it an area for development. Rather the habitat value could be improved to offset the trees that have been removed and the virgin ground that has already been built upon in this area.

Considerable concerns about the density proposed, stating it is too high, and that the area around BOSC was originally supposed to be for low density eco self-build houses that would tie in with the landscape. The more houses there are the less trees and historic landscape.

Comments on the proposed design, stating that to retain the town's Green Vision and credentials, any new build should be of eco-design with solar /pv and EE fitted as standard and ideally ground or air source heat pumps. The use of bat bricks, swift bricks or towers, owl lofts and a central communal wildlife pond as a landscape feature would be welcome if sand extraction has to take place.

Concerns about impact of development on infrastructure. There is no public transport and health services are stretched. Expressed concern that the Health Hub proposed for Whitehill and Bordon is not yet 100% confirmed and thus need to ensure there is adequate medical provision if the Health Hub does not get built with the Local Plan acknowledging this. There should be a requirement supporting public transport e.g. via S106, as this is crucial for the community, especially where we have no train station.

HCC is making cuts, the roads are in bad condition, traffic is increasing and the recycling centre is under threat of closure, yet more homes are proposed. Development here also puts pressure on infrastructure and transport which serves Farnham.

Concerns about the impact of development on the character of the area. The loss of trees and wildlife is changing the character of the area, to be more suburbia than village. Development would have a considerable impact on the outlook from the sports fields.

Considerable concern about environmental impact of development, particularly about the loss of trees and woodland, and associated potential impacts on climate change. Specific concerns about the impact on Shortheath and Kingsley commons, nearby SSSIs. People need wildlife and greenspaces. These are some very sensitive important ecological sites, including a SSSI. It is essential that the two SINCs here are kept intact. There has already been an enormous increase in footfall, traffic, fly tipping and criminal behaviours. The area has also become more prone to flooding since trees have been removed effecting people living close to this site.

The TPO'd oaks should be retained, and the housing numbers reduced slightly with strictly native tree and wild plant landscaping.

There are old banks and ditches within the woods which should at least be recorded if they cannot be preserved. The difference here is that the woodland is predominantly native, it is not a dark and foreboding crop of non-native hemlock with minimal wildlife value designed to be clear-felled for a crop. The woodland here is full of wildlife including owls, deer, foxes, bats and badgers.

There is a bronze age cemetery once known as Seven Barrows behind the Military Cemetery, these are high status burial mounds of clan chiefs and their kin and are around 4000 years old. There is also an ancient Holloway here that could be Mediaeval or earlier. This runs parallel to the Relief Road. These must be preserved as part of our local heritage. Concern that heritage landscape features such as field boundaries, banks and ditches, holloways and any archaeological features are retained as part of such development. Similarly, that as much native woodland can be retained and conserved whilst removing invasive and plantation species.

A request for more walking routes.

The proposed development does not align with the policies included with the EHDC local Plan.

An alternative site is the parade ground.

Representations have been received from key statutory consultees including Hampshire County Council, in its role as the Local Highway Authority (including public rights of way), Local Education Authority, Minerals and Waste Planning Authority, Lead Local Flood Authority, and Public Health body. HCC consider that connections onto the existing Oxney Drain would be fundamental as well as connecting into the Green Grid/Green Loop. Connections across to the western side of the A325 are also key to access employment and the Hogmoor Enclosure. The development parcel would also need to be consistent with the already permitted Phase 3 in facilitating a route appropriate for the use by buses should demand require that in the future, and off-road cycling facilities north/south connecting Havannah Way to Budds Lane and Station Road.

The South Downs National Park Authority (SDNPA) has raised concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat including the SPA.

They have suggested that given the scale of proposed additional development in Whitehill & Bordon, the Draft Local Plan should require development to deliver both multifunctional green infrastructure (GI) and the Bentley-Bordon old railway line for nonmotorised use (NMU). The part of the line in the SDNP is safeguarded for NMU delivery under SDLP Policy SD20. The opportunity to deliver the safeguarded route across both LPA Areas should be discussed further as a cross-boundary matter, and should be included in any future allocation and policy criteria.

Concern has also been raised regarding the significant additional traffic that will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

The SDNPA has also raised concern regarding the significant additional traffic will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

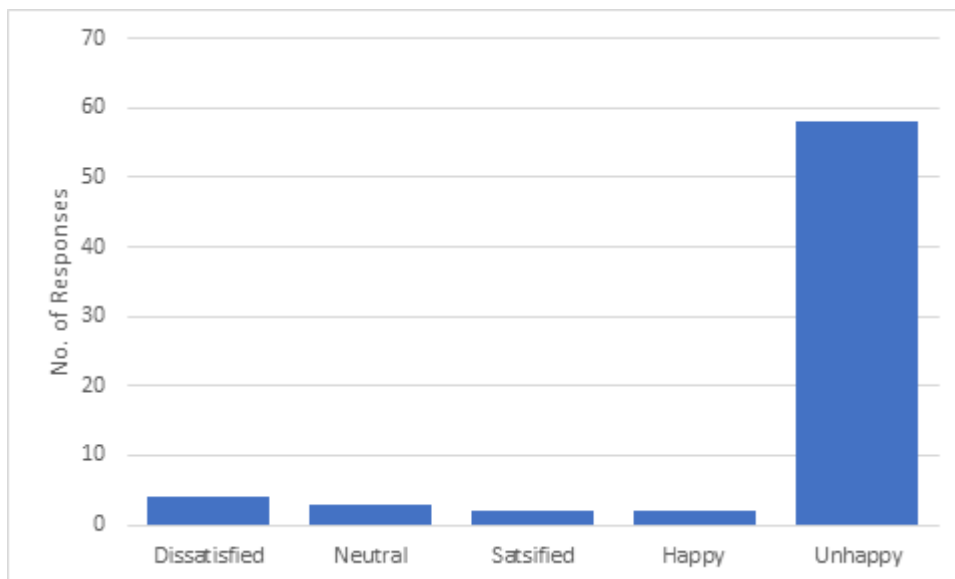
Whitehill Town Council & The Whitehill & Bordon Community Party both recognise that housing increases extra economic activities such as the creation of local jobs and businesses. However, concern has been expressed that housing without the associated infrastructure, there will be a strain on local vital facilities. Concern has also been expressed that the proposed Health Hub is not yet 100% and suggest that the Draft Local Plan recognises that adequate medical facilities are provided if the Health Hub is not built. It is also suggested that there should be a requirement supporting public transport via a S106 legal agreement which is crucial for the community given that there is no train station.

The Environment Agency responded in relation to the site posing a risk of contamination, (and a history of this on the site). It was suggested that to ensure that the planned development doesn't pose unacceptable risks to the water environment, a site-specific policy should be developed to enforce contamination investigation along with a remediation strategy and verification process. The Environment Agency also stated that restriction may be placed on the uses of deep infiltration systems for surface water drainage.

Thames Water suggests that the scale of development is likely to require upgrades to the wastewater network.

Pro Vision (on behalf of Bargate Homes) consider that the development of approximately 65 homes at Whitehill & Bordon (draft policies W&B3 and W&B4) promotes the clearance of over 2ha of woodland which contradicts the Government's objective to deliver significant net gains in biodiversity. They suggest that there are alternative sites available which do not promote the clearance of sensitive natural habitats and which should be considered more favourably in the first instance.

Question: Site W&B4 Louisburg Residential Extension - How do you feel about this site?



Question: Site W&B4 Louisburg Residential Extension - What are your comments on this site?

Any supportive comments were in relation to an acceptance of the overall amount of housing allocated to Whitehill & Bordon, given the context. One comment suggested this was good use of spare infill land.

However, most comments raise concerns, and state that this is a reverse of a promise to retain this land as woodland/greenfield. This sets precedent for further expansion at an increasing density.

The key issues being raised are infrastructure, flood risk and impact on the environment.

In terms of infrastructure, comments that the existing infrastructure isn't sufficient and cannot cope. There is no public transport and the roads are increasingly congested. There is

insufficient work places, so increased commuting, by car (this isn't an eco-town as have to drive everywhere). More infrastructure needs to be planned, e.g. a train station or a hospital – so far very little has been built that is in addition to what was already here. Development will increase parking problems in the area. Development will also put pressure on infrastructure and transport which serve Farnham, particularly train and bus services and access to A325, A31.

Expressed concern that the Health Hub proposed for Whitehill and Bordon is not yet 100% confirmed and thus need to ensure there is adequate medical provision if the Health Hub does not get built with the Local Plan acknowledging this. There should be a requirement supporting public transport e.g. via S106, as this is crucial for the community.

This development would destroy woodland, SANG and large areas of habitat. The woodland is in natural state of equilibrium and houses many species of animals. This area should be protected, not built on. No trees should be cut down.

The following have habitats here; birds, bats, reptiles, deer, foxes, rabbits and hedgehogs grey in-crested newts, badgers, bats inc brown long ear, pipistrelle and soprano Pip, tawny owl, great spotted woodpecker, nationally scarce Wood Ant. This site is a SINC and should be protected - EHDC is now required by law to get a 10% increase in Net Biodiversity, query how is this to be achieved if EHDC allows the destruction of a SINC for new housing. Reduction of any part of this SINC in terms of its size will reduce its ecological integrity leading to further degradation of habitat and its attendant species. Anything that affects any ecological unit in our area be it a SINC, Local Nature Reserve, SANG, SSSI, SAC or SPA has an impact on the wider ecological area. The developer has not shown how they would maintain the wildlife or achieve biodiversity net gain, as required by the national planning policy framework. The developer has not maintained existing provision.

This is against the Green Vision for the town. Given climate change, this woodland is needed. The land is used daily by people for walking.

The land is sloped, uneven, and prone to flooding due to its elevation. The developer would have to undertake extensive and expensive work to make the land suitable for building. Many comments saying the site is waterlogged and boggy with inadequate drainage, and querying where the water will go. There are existing drainage problems on Oxney Way that should be fixed before anymore housing is proposed.

New homes here would be at significant risk of flooding due to being located nearer to the river which regularly floods and due to fact there is this drop off that makes the plot lie at river level. The steep hill allows a lot of surface water to flow into that area and this into the stream further down.

Development would have an adverse impact on the amenity of current residents and new residents. The smell from the sewage works is strong in that area, new homes should not be built adjacent to a sewage station. The removal of the trees would expose existing residents to the sight of more houses, reducing their privacy. There is a significant drop of 15ft+ which would drastically affect the amount of light these houses would receive, especially during the winter.

Development would have an adverse impact on the character of the area. This is a natural rural area. The land offers a scenic view and a convenient access to the countryside for

many residents. The development of the site would ruin the natural beauty and the quality of life of the community.

This proposed development does not align with the policies included with the EHDC local Plan.

As alternatives suggested; the empty land beside the future skills centre, the large undeveloped area currently earmarked for a 'Tech Forest' (vacant for years).

Whitehill Town Council & The Whitehill & Bordon Community Party both recognise that housing increases extra economic activities such as the creation of local jobs and businesses. However, concern has been expressed that housing without the associated infrastructure, there will be a strain on local vital facilities. Concern has also been expressed that the proposed Health Hub is not yet 100% and suggest that the Draft Local Plan recognises that adequate medical facilities are provided if the Health Hub is not built. It is also suggested that there should be a requirement supporting public transport via a S106 legal agreement which is crucial for the community given that there is no train station.

The South Downs National Park Authority (SDNPA) has raised concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat including the SPA.

They have suggested that given the scale of proposed additional development in Whitehill & Bordon, the Draft Local Plan should require development to deliver both multifunctional green infrastructure (GI) and the Bentley-Bordon old railway line for nonmotorised use (NMU). The part of the line in the SDNP is safeguarded for NMU delivery under SDLP Policy SD20. The opportunity to deliver the safeguarded route across both LPA Areas should be discussed further as a cross-boundary matter, and should be included in any future allocation and policy criteria.

Concern has also been raised regarding the significant additional traffic that will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

The SDNPA has also raised concern regarding the significant additional traffic will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

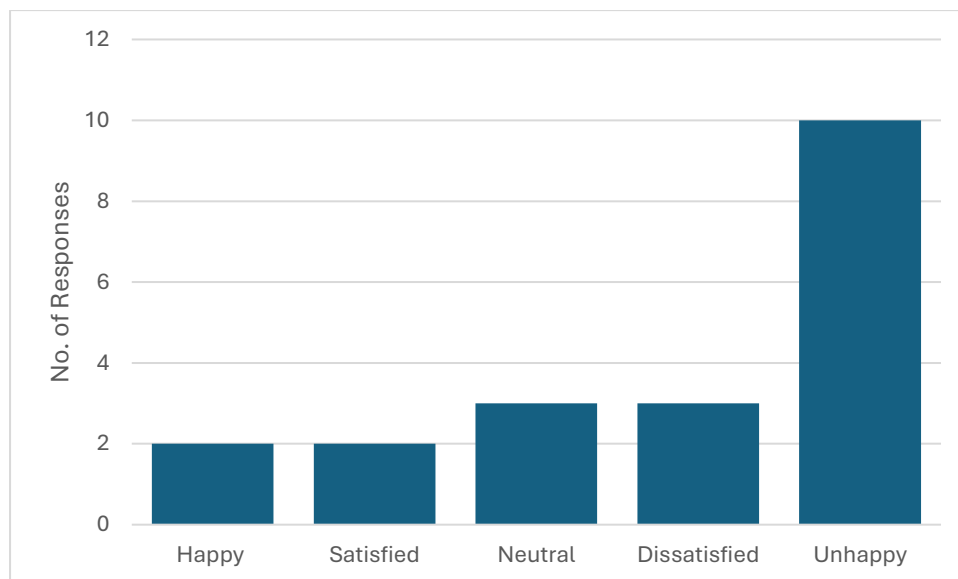
Thames Water do not envisage infrastructure concerns regarding wastewater networks in relation to the proposed development.

The Environment Agency responded in relation to the site posing a risk of contamination, (and a history of this on the site). It was suggested that to ensure that the planned development doesn't pose unacceptable risks to the water environment, a site-specific policy should be developed to enforce contamination investigation along with a remediation strategy and verification process. The Environment Agency also stated that restriction may be placed on the uses of deep infiltration systems for surface water drainage.

Pro Vision (on behalf of Bargate Homes) consider that the development of approximately 65 homes at Whitehill & Bordon (draft policies W&B3 and W&B4) promotes the clearance of over 2ha of woodland which contradicts the Government's objective to deliver significant net gains in biodiversity. They suggest that there are alternative sites available which do not promote

the clearance of sensitive natural habitats and which should be considered more favourably in the first instance.

Question: Site W&B5 North of Louisburg Employment Proposal - How do you feel about this site?



Question: Site W&B5 North of Louisburg Employment Proposal - What are your comments on this site?

The South Downs National Park Authority (SDNPA) has raised concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat including the SPA.

They have suggested that given the scale of proposed additional development in Whitehill & Bordon, the Draft Local Plan should require development to deliver both multifunctional green infrastructure (GI) and the Bentley-Bordon old railway line for nonmotorised use

(NMU). The part of the line in the SDNP is safeguarded for NMU delivery under SDLP Policy SD20. The opportunity to deliver the safeguarded route across both LPA Areas should be discussed further as a cross-boundary matter, and should be included in any future allocation and policy criteria.

Concern has also been raised regarding the significant additional traffic that will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

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DIO object to the infrastructure requirements listed in Fig 12.10 – these should be more evenly apportioned across all sites.

HCC comment that the electricity substation which has been approved within the red line should be set out as a constraint. Access proposals for wider employment have not been considered in detail as part of that application, but access from Hudson Road should be appropriate to accommodate some employment uses.

Historic England has no comment.

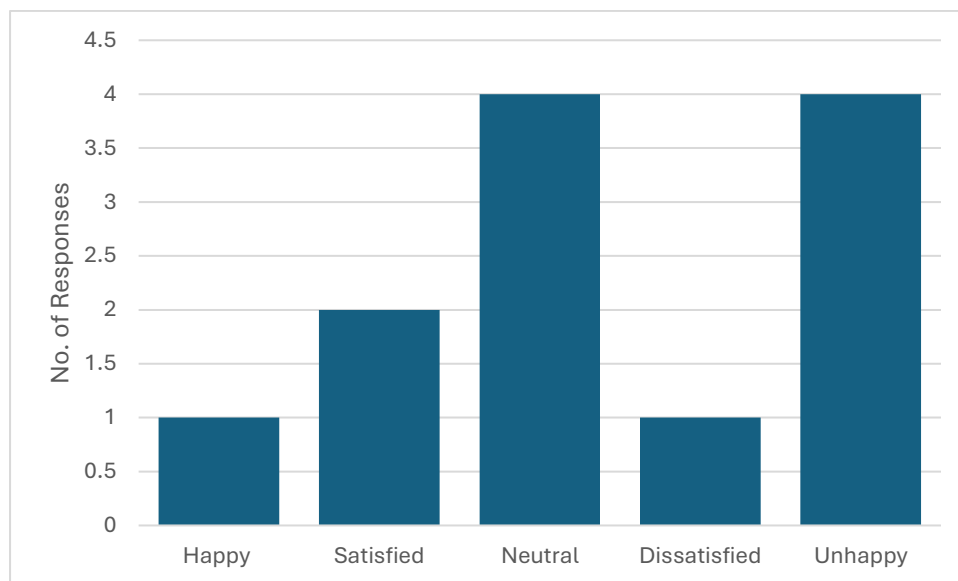
Thames Water further detail is needed to assess the impact of the development of this site on the waste water network infrastructure and sewerage treatment works.

Environment Agency refer to the fact that the site/vicinity has a history of land contamination and request that a site-specific policy should ensure that a contamination investigation along with a remediation strategy and verification process is required. Need to refer to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.

Whitehill Town Council concerned that the area is taking a significant amount of growth both housing and employment but recognise that new housing increases/creates extra economic activity, creating jobs locally and supporting local businesses is supported. Development can also generate S106 that can be invested into the local area. We would not want to see the development and regeneration of the new Town Centre area stagnate.

Other comments refer to the fact that the site is significantly constrained by woodland and consequently any requirement for 10% BNG could not be achieved. Lack of logic to allocate this site when other employment land is unused. Tech Forest should be developed first and has been vacant for many years. Concerned there's a lack of infrastructure to support the levels of growth identified for Whitehill and Bordon. There's sufficient brownfield sites without using those covered by trees.

Question: Site W&B6 Land at Lion Court, Farnham Road - How do you feel about this site?



Question: Site W&B6 Land at Lion Court, Farnham Road - What are your comments on this site?

The South Downs National Park Authority (SDNPA) has raised concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat including the SPA.

They have suggested that given the scale of proposed additional development in Whitehill & Bordon, the Draft Local Plan should require development to deliver both multifunctional green infrastructure (GI) and the Bentley-Bordon old railway line for nonmotorised use (NMU). The part of the line in the SDNP is safeguarded for NMU delivery under SDLP Policy SD20. The opportunity to deliver the safeguarded route across both LPA Areas should be discussed further as a cross-boundary matter, and should be included in any future allocation and policy criteria.

Concern has also been raised regarding the significant additional traffic that will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and

Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

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Historic England – no comment

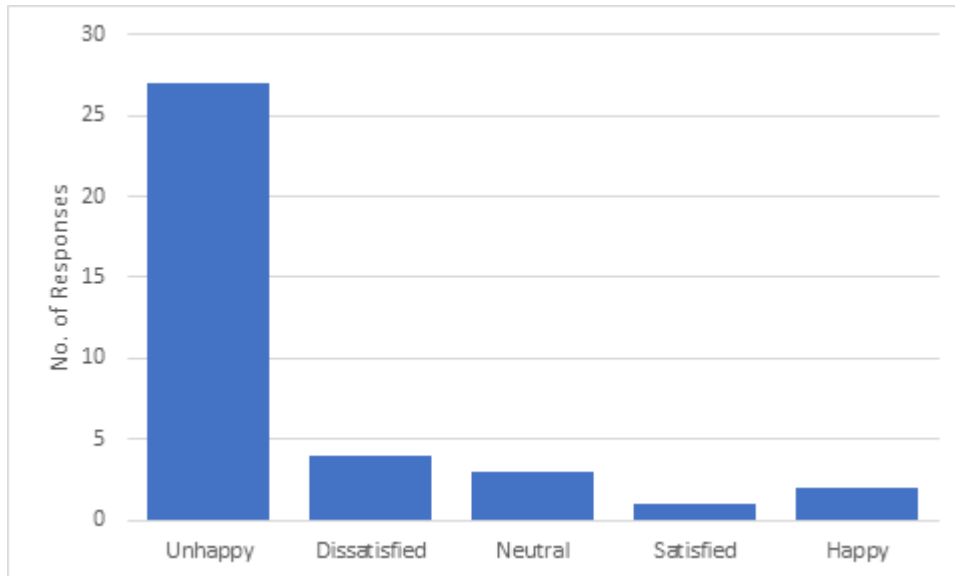
Environment Agency - This site/or the vicinity of has a history of land contamination, any site-specific policy should ensure that a contamination investigation along with a remediation strategy and verification process is included.

Whitehill Town Council concerned that the area is taking a significant amount of growth both housing and employment but recognise that new housing increases/creates extra economic activity, creating jobs locally and supporting local businesses is supported. Development can also generate S106 that can be invested into the local area. We would not want to see the development and regeneration of the new Town Centre area stagnate.

Support this proposal as more employment land is needed to minimise commuting. If this area is developed for employment purposes there also needs to be a local shop to allow those employed to access facilities in their lunch hours as its too far from the town centre. The type of business on this site must be designed to high eco standards, using as many natural materials as possible and to include an interpretation board for local heritage, the walls of the retained gatehouse have excellent examples of military graffiti from WWI and WWII and the former Broxhead House on the site this was built in 1877 by the 5th Baron Foley. The sunken gardens of Broxhead House/Lion Court are national importance and the Garden Society visited them within the past 10 years. The site should link with the Green Loop.

Concern on impact of trees on the site and local wildlife and existing buildings should be utilised rather than building new. The site should not be allowed to be expanded.

Question: Site W&B7 Land at Hollywater Road and Mill Chase Road - How do you feel about this site?



Question: Site W&B7 Land at Hollywater Road and Mill Chase Road - What are your comments on this site?

A small number of supportive comments, noting that the site appears to be highly accessible, with potential for greater connections. There are no major issues regarding flooding etc with potential for increasing biodiversity. Impact should be minimised with appropriate landscaping.

Note Standford Grange Farm is in fact in Headley Parish not in Whitehill Parish and therefore not within Whitehill & Bordon's Settlement Policy Boundary (SPB).

Considerable concern about infrastructure. No more housing should be provided until there is more infrastructure to support it. The schools and health provision cannot cope with additional housing. There is no public transport and no supermarket. There is congestion heading out of Bordon to Farnham. The roads cannot cope with additional housing. Traffic speeds are a specific concern. There are no footpaths along Hollywater Road as this is a rural lane. There is a need for a proper crossing at the Pinch which is the footpath behind the Rec ground opposite the entrance to Whitehill Cemetery.

Site access would be difficult with an already busy local junction nearby. The local sewage works are inadequate for the number of dwellings already in existence.

Also considerable concern about the use of greenfield land, loss of trees and wildlife and the impact of development on the environment. Brownfield should be developed, of which there is still plenty in and around Bordon – query why building on more and more greenfield. The road verge is a SINC as it contains rare Green Wing Orchids.

This is a loss of valuable farmland, which is needed. This site is a farm and should not be developed. The Sang plan violates the boundary of the conservation area by digging a

pound and fencing in tree root protection zone and digging a path presumably with heavy machinery. Development will undermine the economic integrity of the Stanford Grange Farm and the tenants prize winning Charolais Herd.

The proposals will remove fields from the Hampshire County Council owned farm located here. Hampshire County Council considers these farms as highly important for allowing people access to the farming sector who would not normally be given the opportunity. The reduction of the farms farmed area will also risk the viability of the farming business to the current occupants. If the farm is unviable it will increase the likelihood of further development on the farm and further urbanisation of the area.

If development does go ahead then at the very least developers contributions should be found for the conservation management and upkeep of the woodland asset on Stanford Grange Farm.

More open space is not required - the adjacent area of Jubilee Park, off Mill Chase Road, is completely under used simply to due to poor access and management.

Comments that the land is often waterlogged, boggy and therefore is unsuitable for development. The site is liable to flooding and has been consistently waterlogged. The whole area should be SANG.

Archaeological issues raised; Deserted Medieval Village although it has been suggested that it is in-fact a shrunken medieval village. It is likely to be nucleated along Hollywater Road but there is always a possibility of Mediaeval archaeology here, stray finds here have also inclosed a roman rush lamp, a roman honing stone and two Mesolithic Thames picks (tranchet axes). There is also historical documentation of a water Meadow at Shepherds Cottage and raised carrier. Plus a holloway and a Pest House the footings of which are thought to be in just over the border in Stamford. It was used by Headley, Bramshott and Selborne Parishes. The name Hollywater is derived from Holy Water due to the healing springs. The earliest reference to the settlement is in 1349.

It is important that cultural heritage is taken into account.

Development will have an adverse impact on the character of the area; lose the separate identity of Stanford by merging this hamlet with Bordon. Development creep / urbanisation. Concern about impact on the landscape setting of Headley Mill which has been there since Saxon times belonging to Saxon Queen Aelfrida and appearing in the Domesday Book of 1086.

This proposed development does not align with the policies included with the EHDC local Plan

Alternatives suggested; this land should be donated to Hollywater School for recreational and other uses; the north end of the site should be considered for expansion of the Hollywater School providing much needed additional capacity for special educational needs.

The Local Highway Authority (HCC) has suggested that If access is to be provided onto Hollywater Road, opportunities to reduce existing vehicle speeds on the road should be explored to improve safety of all road users accessing and egressing the site. It is further

suggested that access from Mill Chase Road should be avoided so as not to add to conflict with the school operation.

Opportunities for improvements to access the new town centre should also be considered to support any application. Integration is also required to provide a route to the proposed and existing SANG provision to ensure usability for residents of the site and those within the immediate area. There is currently no footway provision on Hollywater Road so access for sustainable users will need to be considered.

In accordance with the Hampshire Minerals and Waste Plan, the County Council suggest amended wording regarding mineral extraction.

The South Downs National Park Authority (SDNPA) has raised concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat including the SPA.

They have suggested that given the scale of proposed additional development in Whitehill & Bordon, the Draft Local Plan should require development to deliver both multifunctional green infrastructure (GI) and the Bentley-Bordon old railway line for nonmotorised use (NMU). The part of the line in the SDNP is safeguarded for NMU delivery under SDLP Policy SD20. The opportunity to deliver the safeguarded route across both LPA Areas should be discussed further as a cross-boundary matter, and should be included in any future allocation and policy criteria.

Concern has also been raised regarding the significant additional traffic that will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

The SDNPA has also raised concern regarding the significant additional traffic will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

Historic England has raised objection to the proposed site allocation on the grounds that the site lies immediately adjacent to the River Wey Conservation Area. The development of the site is likely to affect the setting of this designated heritage asset. Historic England suggest that a proportionate HRA is required to inform the sites development. It is also suggested that consideration should be given to the ruins associated with Standford Mill.

The Environment Agency responded in relation to the site posing a risk of contamination, (and a history of this on the site). It was suggested that to ensure that the planned development doesn't pose unacceptable risks to the water environment, a site-specific policy should be developed to enforce contamination investigation along with a remediation strategy and verification process. The Environment Agency also stated that restriction may be placed on the uses of deep infiltration systems for surface water drainage.

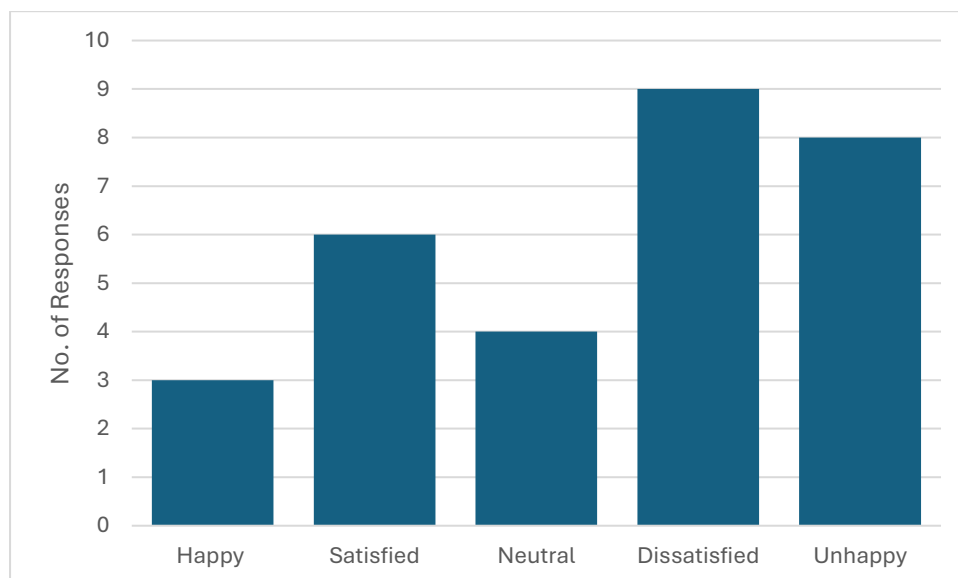
Thames Water suggest that the scale of development is likely to require upgrades to the wastewater network.

The Woodland Trust notes that the site lies adjacent to an area of ancient woodland on the SSW boundary, Eveley Wood. In the event that the site is allocated, the Woodland Trust suggest that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

Avison Young (on behalf of Defence Infrastructure Organisation -DIO) and the Whitehill & Bordon Regeneration Company (WBRC) have raised objection to the wording of the text on the grounds of lack of evidence concerning infrastructure requirements.

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

Question: Site W&B8 Land at the Forest Centre, Whitehill & Bordon - How do you feel about this site?



Question: Site W&B8 Land at the Forest Centre, Whitehill & Bordon - What are your comments on this site?

The South Downs National Park Authority (SDNPA) has raised concerns regarding the amount of proposed tree loss and the individual and cumulative impacts on surrounding habitat including the SPA.

They have suggested that given the scale of proposed additional development in Whitehill & Bordon, the Draft Local Plan should require development to deliver both multifunctional green infrastructure (GI) and the Bentley-Bordon old railway line for nonmotorised use (NMU). The part of the line in the SDNP is safeguarded for NMU delivery under SDLP Policy SD20. The opportunity to deliver the safeguarded route across both LPA Areas should be discussed further as a cross-boundary matter, and should be included in any future allocation and policy criteria.

Concern has also been raised regarding the significant additional traffic that will arise from these sites (both individually and cumulatively), and that this additional local traffic will displace through traffic. This could have potential negative impacts on the SDNP and its setting. Significant increases in traffic in SDNP villages (esp. Binsted, Greatham, and Selborne etc.) could be detrimental to defined village characters. The SDNPA suggest that the forthcoming transport assessment will address this concern and should include a re-assessment of the capacity of the relief road (A325 Templars Way / Louisburg Avenue) in order to accommodate additional traffic; and for mitigation measures, put forward to be fully reflected in any final allocation policy.

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Whitehill Town Council is satisfied with the allocation.

Worldham PC query whether the existing development would be demolished.

Thames Water comment that they do not envisage any concerns with regard to waste water for this allocation.

Environment Agency comment that in terms of surface water /and or groundwater Flooding, the advice of Hampshire County Council as the Lead Local Flood Authority is sought.

HCC as education authority refer to the school catchments in terms of the residential element of the proposal.

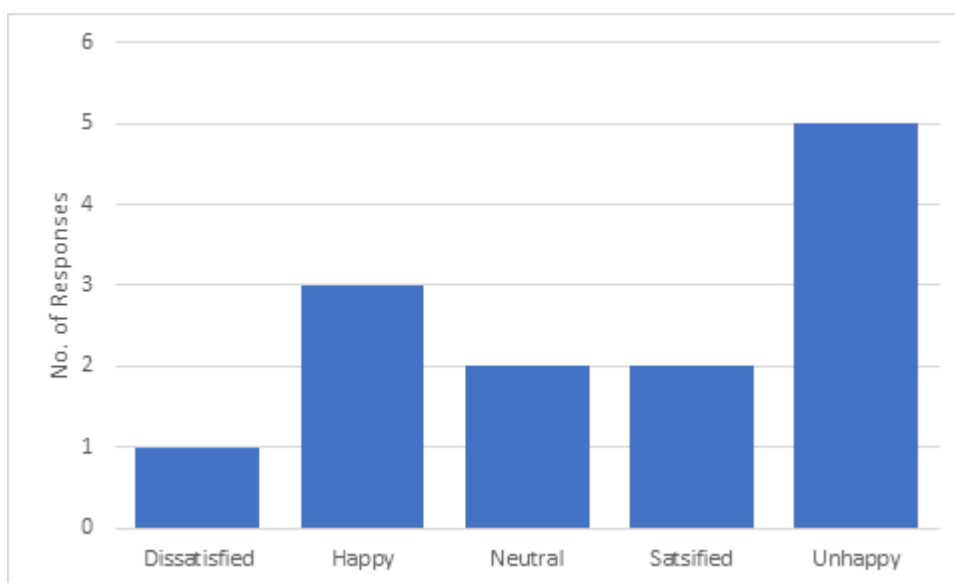
Historic England has no comment.

ICB refer to the need for developer contributions towards improvements at Pinehill Surgery and request to be involve with the master planning of the site to understand the potential for primary and community health services on it.

Natural England refer to the fact the site lies within 5km of the SPA and a bespoke mitigation package would need to be secured.

Other comments refer to the fact that this site is accessible to a large part of the local community many of who do not have access to a car and on this basis it should be improved and invested in. Focus should be to get existing units occupied before building new ones. The area does not need more housing, there is a lack of supporting social services and facilities. Concern about impact on local roads and lack of public transport. Also concern about impact on this site, when the new town centre is fully functioning, but is essential this site is retained for the local community. Forest Centre has suffered years of lack of investment and may benefit from new investment but not housing. Must retain all the existing facilities and also consider addition of amenity space and allotments, to make this area more attractive and for it to be retained as a vital part of the locality.

Question: Site HDN1 Land at Woodcroft Farm - How do you feel about this site?



Question: Site HDN1 Land at Woodcroft Farm - What are your comments on this site?

Suitable location as Havant is ideally situated for access to major towns and cities. It has sufficient infrastructure (incl. bus routes and community facilities) to meet the needs of more housing and residents and is centrally positioned for access to major supermarkets.

There is a low level of impact from this development on East Hampshire.

This site has many practical advantages with drainage and access to support development

However, a few concerns raised. These include concerns about impact on local infrastructure and wildlife/habitats.

This proposed development does not align with the policies included with the EHDC local Plan

Whilst they may seem an easy solution, it is still the loss of open spaces which keep Lovedean Lane looking green. Lovedean lane has already experienced development.

A query about how the site is labelled – asking why it is classed as Horndean and not LOV2 as it is in Lovedean?

<p>Environment Agency</p> <p>Source protection zones 1, 2 and 3, principal aquifer, situated near historical landfills, surface water /and or groundwater flooding.</p> <p>Groundwater Protection - The site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled. We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p> <p>Contamination - This site is in the vicinity of/and or has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and SPZ1, does not pose unacceptable risks to 28 17 the water environment, a site-specific policy should include the need for a contamination investigation along with a remediation strategy and verification process.</p> <p>Surface water /and or Groundwater Flooding - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
<p>Portsmouth Water</p> <p>Source Protection Zone 1. This site is underlain by Lambeth Group overlying Chalk. This geological situation is prone to solution feature formation. Solution features are present in the immediate vicinity. These can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies is present. Groundwater in the Chalk is relatively shallow in this area (>20 mbgl) and the presence of solution features increases the risk profile of the site. Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.</p>
<p>HCC highways</p> <p>Vehicular access to this site would need to be achieved through the new Catherington Park development, however it is noted there are mature trees that may make this difficult, along with some of the new residential roads which are an unsuitable width to accommodate significant levels of additional vehicle movements. Vehicle access should not be provided to the north of the site as the rural and narrow nature of the road is not suitable for the traffic levels generated. Consideration should be given to the presence of existing rights of way (bridleways and footpaths), ensuring that routes are maintained and enhanced. Pedestrian links to local facilities at present are not direct and should be provided to enable direct and convenient pedestrian and cycle access from the development through the bird estate to the school and community centre.</p> <p>Subject to the necessary regulatory tests being met, the County Council will seek off-site obligations for surface improvements to Horndean Byway Open to All Traffic 46; Havant Bridleway 1b; Horndean Bridleway 30; Denmead Bridleway 42.</p>
<p>HCC Education</p>

See rep for details of what required.

Havant Borough Council

Havant Borough Council notes that there are two sites which are immediately adjacent to the border between the two authorities: ▪ HDN1 - Land at Woodcroft Farm - 164 dwellings (this land actually lies adjacent to a development for ~290 dwellings currently being built out in Havant Borough planning references (APP/13/00804; APP/20/00357) ▪ RLC4 - Land at Little Leigh Farm - 81 dwellings With a large unmet need, it is expected that allocations are likely on land close to Havant and within the Portsmouth Housing Market Area. Havant Borough Council looks forward to working with East Hampshire District Council to refine these two individual allocations, together with any further ones which emerge close to the boundary. It is essential that allocations reflect our respective evidence base studies, particularly on infrastructure need.

Natural England

Solent designated sites (SPA/SAC/Ramsar) The site allocations listed below fall within the Solent catchment area and are subject to demonstrating robustly that they achieve nutrient neutrality, in accordance with Policy NBE9. We advise that you make clear use of Natural England's latest guidance on achieving nutrient neutrality for new housing development (January 2024). This guidance has been published alongside an updated nutrient calculator. Please see further information in later chapters and our HRA comments regarding nutrient neutrality.

Nutrient budgets and assessment, and any nutrient mitigation proposals must be agreed with Natural England and securable in perpetuity.

The following sites fall within close enough proximity to the boundary of the South Downs National Park that they could have potential negative impacts to its landscape features and special qualities and must therefore consider Policy NBE10. We advise that you seek the views of the landscape advisor/ planner for the National Park for their knowledge of these sites and the wider setting, together with the aims and objectives of the park's management plan and how this can be considered through the Local Plan.

Natural England advise that the Council need to undertake a landscape assessment/ landscape and visual impact assessment (LVIA) to demonstrate that these site allocations are deliverable in their current locations. The Plan correctly identifies that landscape impacts should be considered across these allocations, yet it does not conclude that the Council has conducted its own assessments to justify the sites. Given the scale of some of these developments and the varied topography across the Local Plan Area, Natural England recommend that a landscape assessment to underpin this Plan is necessary. We would expect appropriate consideration through the Plan to further the purposes of the National Park's protected landscape features, characteristics and special qualities.

Horndean Parish Council

This is effectively an extension of Havant Borough's Catherington Park development, which itself is also being extended by the Woodcroft Copse development. The early planning submission we have seen is for 200 dwellings, not 160, with many dwellings in flats or apartments. The site is only accessible via Eagle Avenue/Milton Road.

The "local shops" are convenience stores, the nearest supermarkets for the weekly shop being Sainsburys/Lidl/ASDA at Waterlooville or Morrisons on the A3M, increasing traffic on Lovedean Lane and Milton Road.

The proposed development on Lovedean Lane is close by and two other developments are underway on Lovedean Lane (Havant Borough side).

The Land in the winter is wet, run off is high, and flooding on the smaller roads (e.g. Anmore Road) and in Lovedean Lane residents' gardens on the west side is frequent. There are significant wildlife issues such as a large badger population in the centre of the proposed site. The developer proposes to surround the badgers!

There is Woodcroft Junior School on site, but the nearest senior schools are at Cowplain and Horndean Technology College, again a drive not a walk. Buses run to Cowplain but not to Horndean.

These drainage and traffic issues need to be understood and mitigation planned. The existing issues with the access roads on to the Catherington Park site need to be resolved (currently the roads are unfinished and not adopted).

SE Hants Ramblers Group

It is noted that currently the PRowS around the site are ill defined. May be as a result of the adjoining development, but this needs to be highlighted as an issue to be addressed. –

On the site map it would be useful to identify the PRowS abutting the site as bridleways and include reference to these in the constraints and opportunities section (C&O).

Woodland Trust

The site is adjacent to an area of ancient woodland on the NE Boundary, James's Copse 5.285 Ha at grid ref SU683123. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

Site promoter rep

Developer PDF 4 from Savills – see rep

Summary from the rep:

Overall, Grainger Plc broadly welcomes the direction of travel of the emerging EHDC Local Plan and welcomes the robust and justified allocation of Land at Woodcroft Farm. However, as set out in this document, it requests some minor modifications to policies as the plan progresses, in order to ensure that the plan can be considered sound and deliverable.

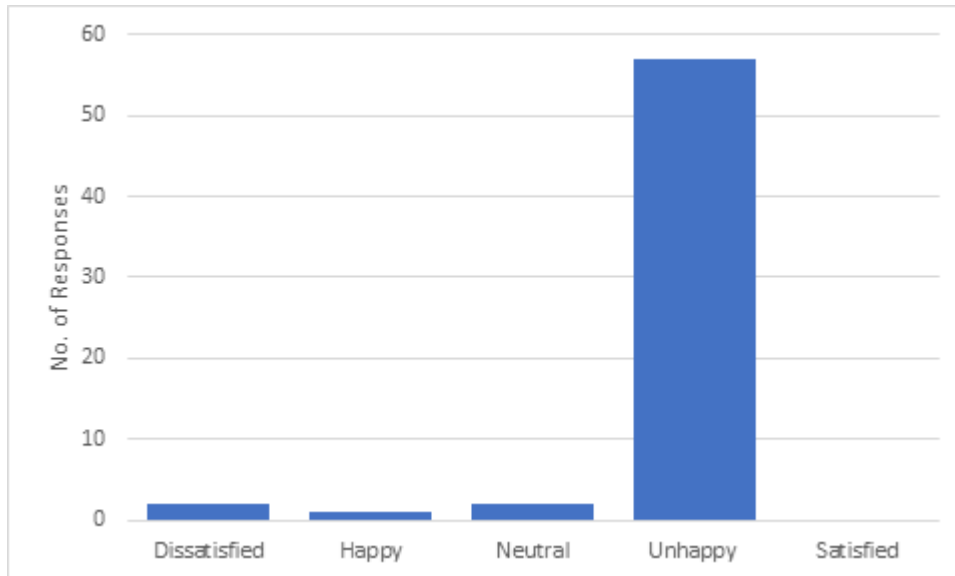
Land at Woodcroft Farm has the ability to provide a high-quality living environment and a sustainable residential development of up to 200 units without harm to any environmental designations. Grainger Plc's aspiration is to create a layout which responds to and enhances the site's physical and ecological characteristics, creating a strong sense of identity and allowing the surrounding nature and landscape to form an integral part of the settlement of Horndean.

Grainger Plc wishes to be kept informed as work on the draft plan progresses to Submission version stage, and would welcome a meeting with EHDC officers to discuss any of the comments made in these representations.

HCC as landowner

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

Question: Site HDN2 Land south of Five Heads Road - How do you feel about this site?



Question: Site HDN2 Land south of Five Heads Road - What are your comments on this site?

A few supportive comments stating that Horndean is good location for more housing due to its proximity to major roads linking it to large towns and cities, and it has good retail infrastructure.

This site is a logical location on the edge of the development around Horndean and manageable in terms of transport and access.

Most comments raised objections to the proposal, with quite a few stating that they have already commented on the planning application. Also concerns about further expansion of this site, and saying the cumulative impact in the local area should be considered.

This is an unsustainable location for development; there is no employment within the village and there are no facilities. All travel will be by car.

The site falls entirely within the small village of Catherington, population 2849, at the last census. As such, it does not meet the Tier 4 proposal for development, as laid out on Page 146 of the EHDC Local Plan Site Allocations, which states 'only small scale developments are appropriate'.

This proposal is infill and erodes the gap between Hordean and Catherington. These gaps must be preserved to maintain the identity of these communities. This green belt is valuable to separate Catherington from Hordean. Approximately 118 homes at Horndean (draft policy HDN2) does not rely on any existing defensible boundary and creates an arbitrary northern edge to the settlement which will narrow the undeveloped gap with the village of Catherington (and its Conservation Area) to approximately 100m.

The proposed development will cause the loss of green field agricultural land (used since 1950s). This site is Grade 3 agricultural land. The site should not have been chosen as it contravenes the Local Plan paragraphs 5.99 and 5.100. The UK is short of land used for farming – this erodes food security. To reduce the current field size with this development

disrupts safe access to large farm machinery and will also reduce the size to below viable modern agricultural needs.

The proposed development will cause the loss of established wildlife including deer, bats, green and spotted woodpeckers, hedgehogs and dormice, which will all suffer loss of habitat. The development will require destruction of existing hedges and trees that provide shelter and homes for a wide variety of flora and fauna. Attention must be drawn to the recent Dormouse report.

The proposed development will have an adverse impact on the character of the area. The land is elevated from the existing houses along the Bridle Path so any build work will overlook the current housing and destroy all nature in the area. This area is partly rural and should stay that way.

Catherington has a distinct character and history. The proposal will have an adverse impact on this.

As the land of the proposed development is at a much higher elevation, the proposed buildings will look down directly into the gardens and homes of the occupants of the Bridle Path creating a loss of privacy and light and pollution. There are blocks of 3 storey flats which are totally out of keeping with other properties in this area. Their proximity to properties on the Bridle Path will create further privacy and light and noise pollution issues from cars. Building large houses with small gardens or small houses with either small or no gardens is a mistake.

The site is adjacent to a conservation area and development will have an adverse impact on heritage.

Most comments raise concerns about adverse impact on infrastructure, particularly congestion, stating that the road infrastructure around the site is not suitable for more traffic.

The roads, especially Catherington Lane, are already very busy with local and school traffic, residents have to queue for long periods at the traffic lights at the Catherington Lane / Portsmouth Road junction. Five Heads Road is a single lane with few passing places for cars, it is narrow with no street lighting and the road itself is in poor condition. It cannot be widened. There are schools at both ends. It is a sunken lane and should not be destroyed. The footpath stops just north of the Bridle Path, making it dangerous for pedestrians & cyclists. Cars regularly park along the narrow pavement forcing pedestrians into the road. The end of Lychgate drive is already dangerous, and with another exit up the road it will get worse. There should be restrictions on where construction traffic can access and park.

Schools are already full with no room to expand; more school places needed. Doctors surgeries are over subscribed. The surgery at Horndean will need extra doctors, nurses and consulting room. CLanfield surgery is at capacity and cannot be extended. Ssewerage and drainage should be considered too, especially when Southern Water cannot meet legal requirements for discharge of foul and storm drainage.

There is a high voltage live above the site, and development under or close to it is not desirable.

This development proposal will cause flooding near the Bridal Path.

Greenfield sites shouldn't be developed when there are numerous brownfield sites in the local area. The Government has recently specified that building should take place on brown field or industrial sites.

Alternative sites should be used; Land East of Horndean is a far better site for development; outskirts of Petersfield; Lucky Lite Caravan Park.

This proposed development does not align with the policies included with the EHDC Local Plan. This policy response does not deliver the vision for our residents to be able to live in healthy, accessible, and inclusive communities, where quality affordable homes, local facilities and employment opportunities in sustainable locations provide our communities with green and welcoming places to live, work and play. It does not deliver Objective B: Providing better quality, greener development in the right locations.

Comments querying how affordable 'affordable housing' is, saying it is a myth. Also saying a greater proportion of affordable homes is needed as part of the development.

Since the creation of the SDNP, EHDC has to cram as many houses as possible into the remaining space.

<p>Environment Agency</p> <p>Source protection zones 1, 2 and 3, principal aquifer, situated near historical landfills, surface water /and or groundwater flooding.</p> <p>Groundwater Protection - The site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled. We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.</p> <p>Contamination - We also note that for HDN2, a historic landfill is mapped on the edge of the development area. Due to the presences of the SPZ1, the area is extremely sensitive to any contamination. To ensure that the planned development, located over principal/secondary aquifer A and SPZ1, does not pose unacceptable risks to the water environment, a site-specific policy should include the need for a contamination investigation along with a remediation strategy and verification process.</p> <p>Surface water /and or Groundwater Flooding - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.</p>
<p>HCC Highways</p> <p>The County Council query the above average score for this site in EHDC's Accessibility Study. The proposal for 118 homes is a significant quantum in an area which would be reliant on the private car. The Highway Authority has significant concerns regarding sustainability of this site and the lack of real opportunities to improve the site given the existing network and distances to infrastructure.</p>
<p>HCC education</p> <p>See rep for requirements</p>
<p>Historic England</p> <p>HDN2 – Land south of Five Heads Road CTN1 – Land at Parsonage Farm CTN2 – Land at the Dairy Informed by the HER, the NHLE, Catherington character appraisal, the Neighbourhood Character Study, the historic settlement survey for Catherington etc</p> <p>Object - We would encourage a sensitive approach to the north western section of the site, minimising the potential for coalescence with Catherington and impact on the character and setting of its conservation area. Proportionate HIA is merited</p>

Integrated Care Board (ICB)

Horndean Surgery is currently undertaking expansion (internal reconfiguration) works for the surgery and for wider use by the PCN. Additional expansion will be required to support primary care provision within East Hants in the future.

Natural England

Solent designated sites (SPA/SAC/Ramsar) The site allocations listed below fall within the Solent catchment area and are subject to demonstrating robustly that they achieve nutrient neutrality, in accordance with Policy NBE9. We advise that you make clear use of Natural England's latest guidance on achieving nutrient neutrality for new housing development (January 2024). This guidance has been published alongside an updated nutrient calculator. Please see further information in later chapters and our HRA comments regarding nutrient neutrality.

Nutrient budgets and assessment, and any nutrient mitigation proposals must be agreed with Natural England and securable in perpetuity.

The following sites fall within close enough proximity to the boundary of the South Downs National Park that they could have potential negative impacts to its landscape features and special qualities and must therefore consider Policy NBE10. We advise that you seek the views of the landscape advisor/ planner for the National Park for their knowledge of these sites and the wider setting, together with the aims and objectives of the park's management plan and how this can be considered through the Local Plan.

Natural England advise that the Council need to undertake a landscape assessment/ landscape and visual impact assessment (LVIA) to demonstrate that these site allocations are deliverable in their current locations. The Plan correctly identifies that landscape impacts should be considered across these allocations, yet it does not conclude that the Council has conducted its own assessments to justify the sites. Given the scale of some of these developments and the varied topography across the Local Plan Area, Natural England recommend that a landscape assessment to underpin this Plan is necessary. We would expect appropriate consideration through the Plan to further the purposes of the National Park's protected landscape features, characteristics and special qualities.

Portsmouth Water

Source Protection Zone 1. This site is underlain with Clay with Flints formation which overlies the Chalk aquifer. This geological situation is prone to solution feature formation. Solution features are present in the immediate vicinity. These can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies is present. Groundwater in the Chalk is relatively deep in this area (>40 mbgl) but the presence of solution features increases the risk profile of the site. Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.

SDNP

The sites are in the setting of the SDNP and will require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to: landscape character; views; tranquility; and dark night skies. It is important to note that any potential mitigation should not be solely reliant on screening. In order to achieve a landscape-led approach, with the associated necessary evidence, development must respond to

settlement pattern, adjacent built form, and the role each site has as part of the setting of the SDNP.

Southern Water

Southern Water is the statutory wastewater undertaker for Horndean. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development.

Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 118 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.

Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network.

It is therefore important that our suggested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery. Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF. Having regard to the above, Southern Water proposes the following additions to the Infrastructure Requirements of HDN2 (new text underlined): On site drainage: western parts of the site have been identified as highly compatible with infiltration sustainable drainage systems but in eastern areas, significant constraints have been indicated. Appropriate infrastructure will be required to mitigate flood risks. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.

Horndean Parish Council

Our major concerns here are traffic on Catherington Lane and the main sewer on Catherington Lane. The developer traffic survey was done at the wrong time of the day, at a time of the year when two school years of HTC children were on exam timetable and work experience. Catherington Lane is busiest between 0800hrs and 1500/1600 hrs and is considered by the residents as a nightmare. It is busy at other times also, resulting in poor air quality for residents and children attending school particularly between Stonechat Road and London Road.

Those same residents experience significant issues with the main sewer, often resulting with sewage backing up into their houses and gardens. Many have had pumps installed because the main sewer is higher than the local pipework. An additional 118 dwellings plus those at Catherington will exacerbate this issue.

In addition, this development plus those at Catherington, effectively close the gap between Horndean and Catherington to a few yards on the west side of Catherington Lane. Horndean Junior School and Catherington Infant School are full (but walkable to if they weren't) and would require extension or a rebuild.

We understand that Horndean Junior School has been on the rebuild list for some time, but no action has been taken. The nearest weekly shop destination is Morrisons on the A3M (via Catherington Lane!)

Lastly the habitats of wildlife such as deer (which graze the land) and the overall biodiversity of the site, need specific actions not in the current developer plans.

SE Hants Ramblers Group

- The bridleway (Bridleway 34) needs to be clearly marked. - Representations have been made in respect of the planning application 60033 concerning the need to maintain the existing hedgerow and trees and keep a landscaped area between the bridleway and the proposed housing development.

- It is unclear which are parts of the PRow network that the potential to connect to is suggested - is it FP 16/3 and FP 14/2? If so, then the point on the map this is shown needs to move to those locations and the footpaths shown.

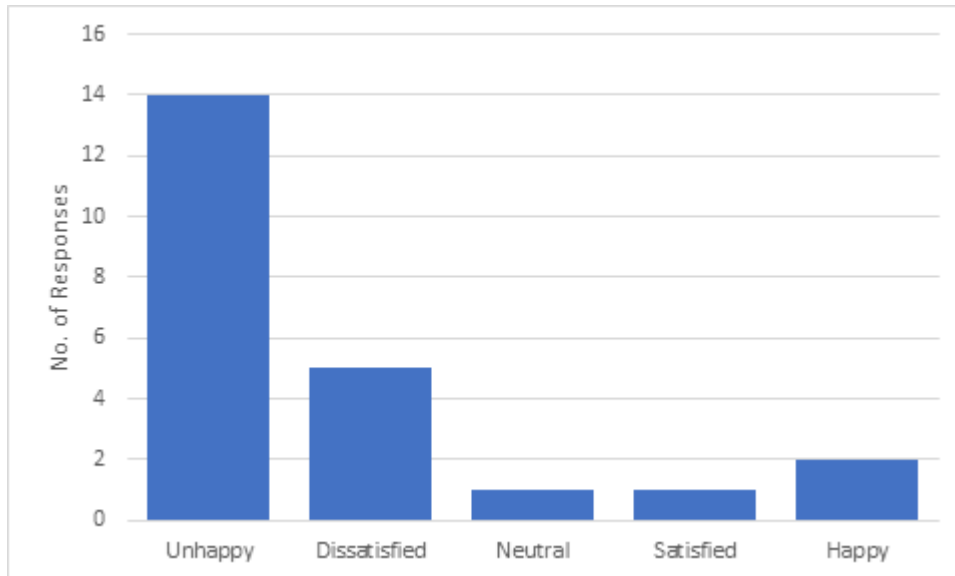
Site promoter rep – Thakeham Homes

PDF#13

Summary from rep:

Thakeham supports the Council's identification of Land South of Five Heads Road, Horndean as a residential allocation in the emerging local plan and is in general support of the methodology proposed for assessing sites. However, as set out above, sites should be assessed against the objectives in line with information submitted in consultation documents, which in this case would show the Site is an appropriate, sustainable allocation that fully accords with the objectives of the emerging Plan. We trust that these representations are clear, and we would be grateful for confirmation of receipt of our submission. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Question: Site HDN3 Land north of Chalk Hill Road - How do you feel about this site?



Question: Site HDN3 Land north of Chalk Hill Road - What are your comments on this site?

A small number of responses expressed supportive comments. This is a suitable area for new development as it is between existing parts of Horndean and has no effect on the gap between communities. Whilst do not want to see greenfield developed, it will provide housing on land that is not currently productive. The site is close to the A3M motorway and May's Yard Industrial area. It would also be an extension of the existing estate style and older more traditional homes so as with Farmers way low impact on local character.

Dissatisfaction with the density proposed. Houses will be close together completely blocking any view and providing little by way of garden. Propose better homes and reasonable size gardens.

This site has already been refused planning in the past which shows unsuitability of the site for mass development. As such, disappointed to see it being identified again as nothing has changed.

The cumulative impact on Clanfield, Horndean and Catherington means over 500 houses in a very small overall area has and increased negative impact. Clanfield has only recently absorbed significant numbers of new housing changing the character of the village and the infrastructure's ability to support the people who live and work here.

The proposal encroaches onto chalk downland.

Most comments raise concerns about infrastructure being insufficient to support the proposed development, with poor road infrastructure and lack of public transport. Development will significant increase traffic in the local area. Concerns also about impact on health facilities and schools (both the infant and junior schools are oversubscribed). Sewerage and drainage should also be considered; especially when Southern Water cannot meet legal requirements for discharge of foul and storm drainage. Water has been streaming

down the road in Highcroft from the field concerned, due to poor drainage which would be made worse by further housing. The site is too close to electricity pylons.

The proposal states that access to the site will be from Chalk Hill Road. The connecting roads of Highcroft Lane, Tarberry Crescent, Durlands Road and Five Heads Road will become more congested. Even now, all of these roads are heavily used, are congested at various times of the day and often have vehicles parked on both sides throughout the day. In particular, the start and end of the school day make the junctions of Five Heads Road with Merchistoun Road and with the Portsmouth Road very difficult and even dangerous at these peak times. With schools either end of Five Heads Road it is already a 'run through' of cars taking children to and from school. Further vehicles will only exacerbate the current problem. This proposal is car reliant.

Particular concerns about access, saying that access through Chalkhill Road is poor. There may be fewer houses included in this plan, but the access issues via Highcroft Lane and the already congested roads remain a problem. The access to this site is only via Highcroft Lane which is a narrow road, barely wide enough for 2 cars to pass each other.

The other site listed for Five Heads Road with an entry from Catherington Lane was logically agreeable for the caveat of this being the only entry. Specifically the reasons were environmental impact and the narrowness of Five Heads road which is accessed by many walkers and cyclists. Placing more building at Chalk Hill Road immediately only offers exit and entry via Five Heads Road which has been specifically identified as a concern in another part of the plan. This needs to be clarified.

This leads to Durland Road, with access to Fiveheads Road. Durland Road is also a very narrow Road, again barely wide enough for 2 cars to pass each other. This would lead to potential accidents. It should not be assumed that the current roads are adequate. The reference to upgrading and widening Chalk Hill road is misleading.

Concern about the impact on the environment and character of the area. Filling valuable countryside gaps with housing loses the identity of each individual settlement. This site is Grade 3 agricultural land, and site should not be developed as it contravenes the Local Plan paragraphs 5.99 and 5.100. The chalk grassland would be a major habitat loss were it to be developed. Destroys a valuable recreation area. Concern that surface water flooding in Tarbery Crescent or in Five Heads where the school crossing is located has not been mentioned.

The proposal will erode the narrow gap to the village of Clanfield, which is already less than 100m at its narrowest.

Sufficient new homes are planned at Hazleton Farm, and more are not needed.

Concern that the proposal doesn't deliver the vision for residents to be able to live in healthy, accessible, and inclusive communities, where quality affordable homes, local facilities and employment opportunities in sustainable locations provide our communities with green and welcoming places to live, work and play. It does not deliver Objective B: Providing better quality, greener development in the right locations. This proposed development does not align with the policies included with the EHDC local Plan

Environment Agency

Source protection zones 1, 2 and 3, principal aquifer, history of land contamination, surface water /and or groundwater flooding.

Groundwater Protection - The site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water

supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled. We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.

Contamination - This site is in the vicinity of/and or has a history of historic land contamination. To ensure that the planned development, located over principal/secondary aquifer A and SPZ1, does not pose unacceptable risks to the water environment, a site-specific policy should include the need for a contamination investigation along with a remediation strategy and verification process. Surface water /and or Groundwater Flooding - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.

HCC Highways

Above average score in EHDC's Accessibility Study: this site is not considered to be sustainable given that residents will be reliant on the use of the private car due to distances to local facilities. There are few opportunities to improve the existing walking and cycling network, and the access proposals as seen by the Highway Authority to date do not demonstrate that safe and suitable access can be achieved. The resulting impact on the Public Right of Way network can therefore not be established.

Notwithstanding the concerns set out above, and subject to the necessary regulatory tests being met, the County Council will seek off-site obligations for surface improvements to Surface improvements to Horndean Footpath 16, 17 and 21.

HCC education

See rep for requirements

Integrated Care Board (ICB)

Horndean Surgery is currently undertaking expansion (internal reconfiguration) works for the surgery and for wider use by the PCN. Additional expansion will be required to support primary care provision within East Hants in the future.

Natural England

Solent designated sites (SPA/SAC/Ramsar) The site allocations listed below fall within the Solent catchment area and are subject to demonstrating robustly that they achieve nutrient neutrality, in accordance with Policy NBE9. We advise that you make clear use of Natural England's latest guidance on achieving nutrient neutrality for new housing development (January 2024). This guidance has been published alongside an updated nutrient calculator. Please see further information in later chapters and our HRA comments regarding nutrient neutrality.

Nutrient budgets and assessment, and any nutrient mitigation proposals must be agreed with Natural England and securable in perpetuity.

The following sites fall within close enough proximity to the boundary of the South Downs National Park that they could have potential negative impacts to its landscape features and special qualities and must therefore consider Policy NBE10. We advise that you seek the views of the landscape advisor/ planner for the National Park for their knowledge of these

sites and the wider setting, together with the aims and objectives of the park's management plan and how this can be considered through the Local Plan.

Natural England advise that the Council need to undertake a landscape assessment/ landscape and visual impact assessment (LVIA) to demonstrate that these site allocations are deliverable in their current locations. The Plan correctly identifies that landscape impacts should be considered across these allocations, yet it does not conclude that the Council has conducted its own assessments to justify the sites. Given the scale of some of these developments and the varied topography across the Local Plan Area, Natural England recommend that a landscape assessment to underpin this Plan is necessary. We would expect appropriate consideration through the Plan to further the purposes of the National Park's protected landscape features, characteristics and special qualities.

Portsmouth Water

Source Protection Zone 1. This site is underlain with Clay with Flints formation which overlies the Chalk aquifer. This geological situation is prone to solution feature formation. Solution features are present in the immediate vicinity. These can act as a rapid pathway to the Havant and Bedhampton springs and therefore a risk to public water supplies is present. Groundwater in the Chalk is relatively deep in this area (>40 mbgl) but the presence of solution features increases the risk profile of the site. Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.

SDNPA

The sites are in the setting of the SDNP and will require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to: landscape character; views; tranquility; and dark night skies. It is important to note that any potential mitigation should not be solely reliant on screening. In order to achieve a landscape-led approach, with the associated necessary evidence, development must respond to settlement pattern, adjacent built form, and the role each site has as part of the setting of the SDNP.

Hordean Parish Council

Biodiversity and traffic are the major concerns here. This development begins to close the gap with the eco-system of Catherington Lith. There has been much development already at the top of Five Heads Road opposite the park. This will add more traffic making its way down Five Heads Road towards the London Road and the Junior School (where there is a particularly nasty blind corner near the old library). Five Heads Road near the park is not sufficiently wide for two vehicles to pass each other. The schools are full but at least within a walkable distance.

Woodland Trust

The site is adjacent to an area of ancient woodland on East & South East boundary 1.98 Ha at grid ref. SU704137. Should this site be allocated, we ask that the presence of ancient woodland be noted in the constraints and that appropriate buffers are specified.

SE Hants Ramblers Group

The site map provided is incorrect as it doesn't show FP 17/1 that crosses the eastern part of the site, nor the route of FP 21/1 that runs along the southern boundary. The distinction between the 'informal paths mentioned in the C&O section and PRowWs needs to be

explained and also how these are to be treated. – A commitment to ensuring that the existing ProWs are kept and remain as green corridors is needed.

Metis Homes

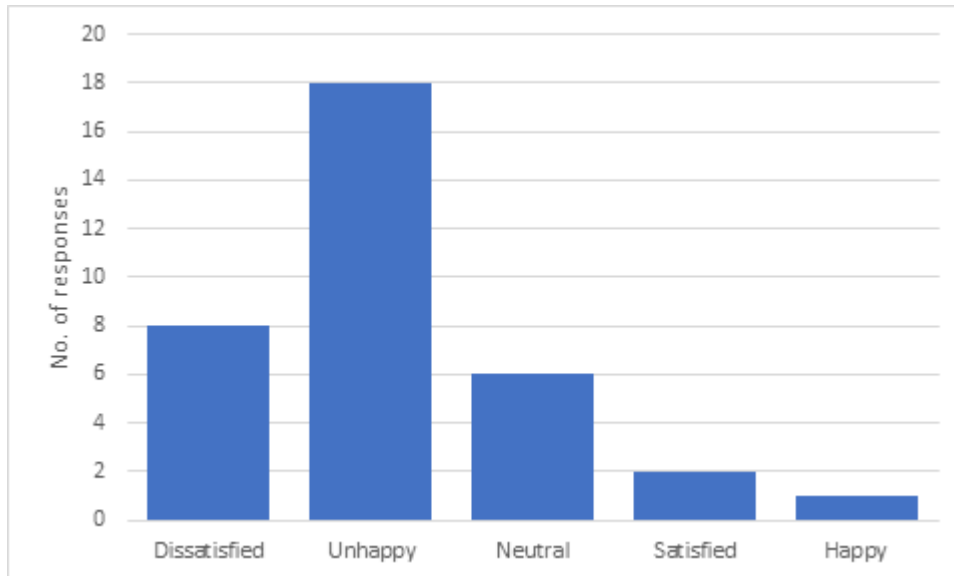
Metis Homes supports the inclusion of Policy HDN3 within the Plan. Metis Homes has promoted the site since 2022 which has included wide ranging consideration and assessment of the site and its surroundings taking into account the location of the site and its close proximity to a range of services and facilities (See Appendix A – Local Services and Facilities Plan), the overall sustainability of Horndean as a settlement, the pattern of existing development within the settlement, landscape character including consideration of key views of the site from the South Downs National Park, ecology, trees, topography, and existing and surrounding neighbours.

Metis Homes is keen to work with Members and Officers of the Council, together with local stakeholders and interested parties, to deliver a high quality development on the site that appropriately responds to the constraints and opportunities presented by the site. This site is particularly well placed to accommodate new development in the southern part of the District as it will assist in addressing the shortfall in the southern PfSH authorities that is likely to persist given the constrained nature of the many of those locations (for example, Portsmouth, Havant and Gosport all being coastal locations with associated flood and ecological sensitivities).

Metis Homes continues to supplement the work done to date in relation to the site through keeping relevant surveys and data up to date which will ensure that, should an application be submitted, it will be supported by the most up to date technical information.

The inclusion of Land at Chalk Hill Road, Horndean: HDN3 within the settlement of Horndean, as contained in the Settlement Policy Boundary Review paper, is welcomed. Its inclusion is reflective of the draft allocation within Chapter 12 of the Plan, and an amendment of the settlement in this location will ensure the site is properly incorporated in to the community within which it is located. One minor point of clarification, it would appear that the 'Action' relating to the boundary alignment (page 39, point 10) needs to be adjusted to remove the text 'Redraw boundary along opposite side of the road' and replace with 'Redraw boundary to include allocated site'.

Question: Site LIP1 Land north of Haslemere Road, Liphook - How do you feel about this site?



Question: Site LIP1 Land north of Haslemere Road, Liphook - What are your comments on this site?

A small number of comments in favour of this proposal saying Liphook is a sustainable location for development and that development helps maintain the vibrancy of the village. Some acceptance of the proposed development but equal concern about the increase in traffic. Another commenting that development should pursue an upgrade / extend / improve the Redford Park BOAT route.

However, most of the comments raise concerns about this proposal.

Comments make reference to this not being a sustainable location for development; primarily due to with location (do not meet principles of 20 minute neighbourhood), traffic and impact on environment. The spatial distribution of new housing in Liphook is unsustainable; Site Allocations figure 12.6 map of Liphook Settlement Policy Boundary shows that Liphook is lop sided today with about 80% of the development to the east of a line drawn north-south through the square. Urgently need a plan to address the east-west development ratio and that must include development sites to the west of Liphook.

Considerable concern about the impact of development on the River Wey Conservation area. Comments saying that development should not be proposed in the conservation area, and query what the point of a conservation area is if it is then built on. This proposal will destroy the conservation area and its setting, adding light and noise pollution. Attempting to build on this site is bending of rules to suit. There is a detailed response from the River Wey Trust stating that the RWCA was designated by EHDC in May 1983 in recognition of its importance to the conservation of a historical landscape and its wildlife. It is the view of the Trust that It is inconceivable that modern housing development could be compatible with the RWCA conservation objectives, particularly conservation of an attractive rural environment, its biodiversity, and the water quality of the River Wey. There is no possible way that any biodiversity enhancement by the developers within the Conservation Area could mitigate the loss of fauna and flora which include regular sightings of owls, bats, deer, badgers, foxes,

and a multitude of bird species. A housing development on this site would seriously affect the effectiveness of the current wildlife corridor so important to conservation. On page 406 under the heading of Built heritage item 5 EHDC emphasises the importance of this Conservation Area. The proposal contradicts the EHDC statement that the RWCA is valued. Any development would have a detrimental effect on this historic, scenic and wildlife friendly special area.

There would be a likely negative impact on important biodiversity sites given its close proximity to Wealden Heath. Any mitigation measures will not compensate for the overall loss of biodiversity that development will bring. Loss of views and wildlife.

Development here would cause a considerable loss of rural character. The site forms a pleasant rural approach to the village. The topography of the site means that any new homes would look completely out of place.

Development would increase flood risk. Increase surface run off and issues with infiltration. The Draft Local Plan acknowledges significant constraints for a sustainable drainage system [SuDS]. Any building in the LIP 1 site will result in increased surface run-off both during and after construction polluting the environmentally sensitive River Wey. Flood risks downstream will also be increased.

There could potentially be significant impacts and disturbances to the surrounding ecosystem and environment which hasn't been seriously considered. This is contrary to the Council's climate change agenda, and chapter on the environment in the Draft Local Plan – as such, the whole plan contradicts itself.

This site would create an elongation of the settlement boundary which is against providing compact walkable neighbourhood. The site is outside the SPB and is intrusive development in the countryside.

There isn't sufficient infrastructure to cope with the development proposed – the infrastructure has not kept pace with recent development in Liphook. Concerned about excessive traffic and pollution already in Liphook. Traffic has increased in the village, to the point that the centre “the Square” is congested and subject to air pollution (at peak hours).

This proposal will make traffic and congestion worse and there are no measures in place to address this. Comments stating that the traffic issues should be resolved before any further development is considered. However, for these proposed sites, the distance to shops, schools, the station and the A3 is likely to encourage travel by car rather than on foot, thus exacerbating the problem.

Significant reservations about safe site access/egress onto Haslemere Road as the proposed connection point is directly opposite Devils Lane and immediately after a significant rise in the road level for vehicles approaching from the Haslemere direction with very poor line of sight, no footpaths. Visibility looks ok on paper, but not on the ground, and question whether this has actually been looked at. The plan includes a possible access road using the byway that runs from Haslemere Road to Hewshott Lane. Anyone who has attempted to drive out from the byway onto the main road will be aware of how hazardous it can be, with drivers speeding over the brow of the hill, regardless of the speed limit and with very little time to react. To open it to more traffic would be dangerous.

Some comments suggested highway improvements that would be needed to support such a development; there are no safe crossing points anywhere along Haslemere Road; Pelican crossing points must be introduced near to this development and another at a point adjacent to the small HCC car park near the new McArthy and Stone development (a separate query whether the Mcarthy and Stone retirement site has been calculated in the 130 outstanding planning permissions figures); the Council must consider the development of a one way or

circular system within Liphook; the development of new houses must contain a parallel proposal for road engineering developments; a relief road.

Concern about the proposed density on site, as the allocation of the site at a density of 9.6 homes/ha appears to be a low density on paper, but because a large section of the site is unsuitable for development, the actual build density on the available land will be much higher and out of place with the general street scene of Haslemere Road.

The proposal has taken no account of the Neighbourhood Plan. Equally, the proposal is contrary to most policies in the Draft Local Plan, particularly in relation to environment, climate and biodiversity.

Other sites should be considered including those that align with the Neighbourhood Plan. Propose that all housing should be in Whitehill & Bordon "new town". Propose consideration of land in the SDNP in Liphook - Sites on this side of the village are isolated and not conducive to a community feel – it would be better to have a larger site, e.g. Bohunt Manor, where amenities can also be built.

Some general comments received stating there is no need for new homes.

Mixed representations have been received from a number of statutory consultees as well as other interested parties.

HCC Local Highway Authority have expressed that subject to the necessary regulatory tests being met, they will seek off-site contributions for surface improvements to BOAT 41.

The ICB has stated that developer contributions would be required towards projects to increase capacity at Liphook Village Surgery.

Thames Water do not envisage infrastructure concerns regarding wastewater networks in relation to this development.

The Environment Agency note that the site is close to the River Wey and request a site-specific policy which sets out the requirement for a Flood Risk Assessment. The Environment Agency recommend that all development avoids Flood Zones 2 & 3 and includes allowances for the lifetime of the development as well as a policy for a suitable buffer.

Historic England has objected on the grounds that of the impact on the Conservation Area which is valued for rural historic landscape.

The SDNPA recommend that any such allocation will be able to sufficiently avoid or mitigate any potential direct or indirect harm to the Wealden Heaths Phase II SPA. It is suggested that the design should be landscape-led and that any potential adverse impacts on the SDNP are avoided mitigated.

The Woodland Trust request that a full tree survey with a policy presumption for tree retention is carried out due to the significant number of trees (inc. protected trees) on site.

Lynchmere Parish Council note that there already heavy traffic on the B2131 from previous developments and commuters to Haslemere. It is suggested that measures are put in place to limit further increase in traffic along the route through Lynchmere Parish. Lynchmere PC have also expressed doubts about the suitability of the site.

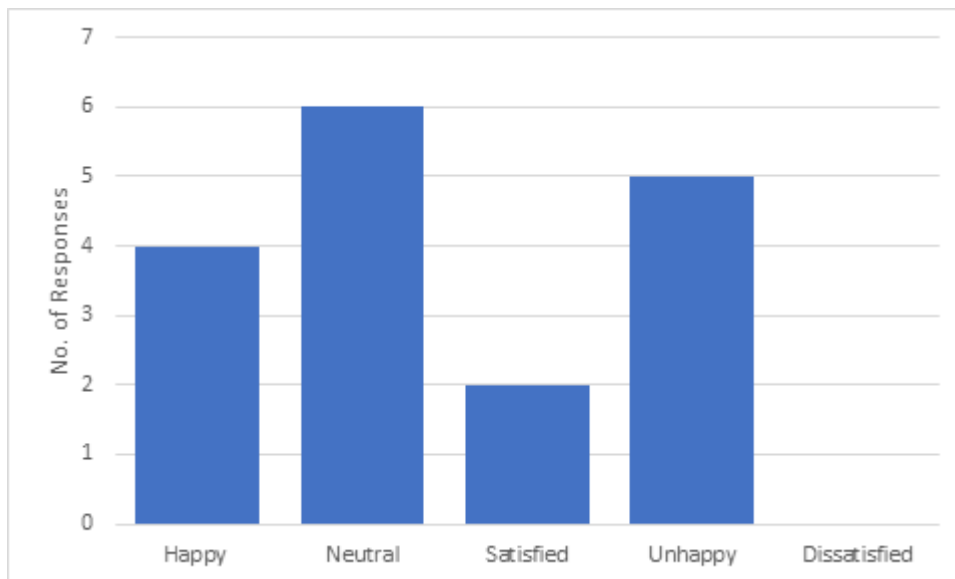
Bramshott & Liphook PC considers that the site is not suitable for development and should be excluded for reasons including the proposal is contrary to policies contained within the BLNDP, site constraints (the majority of the site is situated in the River Wey Conservation Area and Flood Zone 2), proximity to 2 SINCS and an SPA, located outside of the 10 min walkability area and housing density.

South and East Liphook Residents' Group strongly object to the proposed site allocation for reasons similar to above but also including impact on the setting of the River Wey Conservation Area, loss of macrofauna diversity in the field, inadequate sewerage system, flooding, increased surface water run-off, and distance from existing facilities. For these reasons, they consider that the proposed site allocation is contrary to many of the policies in the draft Local Plan.

Several representations have been received from individuals citing reasons for objection such as loss of meadow land, location of site outside of the SPB and within the River Wey Conservation Area, increased flood risk, inadequacy of existing sewerage system, distance from the village centre and schools and impact/loss of wildlife. It is considered that the proposed site allocation is contrary to the Council's Core Objective B and it is recommended that an alternative site in the SDNP is more appropriate.

The site promoter supports the sites inclusion, confirming its suitability, availability and deliverability. The site is currently subject of a planning application for up to 100 dwellings with on-going discussions with the case officer. The site promoter seeks to address a number of considerations in their representation such as landscape, flood risk, green infrastructure, access, design approach, River Wey Conservation Area, affordable housing, CIL, health and traffic.

Question: Site LIP2 Land west of Headley Road, Liphook - How do you feel about this site?



Question: Site LIP2 Land west of Headley Road, Liphook - What are your comments on this site?

Some support for this proposal – saying it is suitable and well located, particularly for access to schools. Although some question whether residents will walk and will inevitably add more cars to the roads, although noting could access schools and A3 without going through The Square. Comments saying this site is suitable for development but questioning the reduction in the number of homes; suggesting this site could accommodate more homes and lessen

the number on other Liphook sites. Small scale development here won't overwhelm existing infrastructure. Pedestrian access to schools is a positive aspect.

However, comments raising concerns about the proposal not being in keeping with the character of the village, and will have a detrimental impact on wildlife and infrastructure (roads, schools, doctors etc).

Whilst some state the site is well located, others have said the site is quite a distance from the centre of Liphook. All three sites are too far from Liphook centre to encourage pedestrian or cycling access to facilities. The site will impact on the Avenue, which has become a rat run for the A3. Emergency vehicles struggle to get through at school/peak times. The Council must consider the development of a one way or circular system within Liphook.

The site is outside the SPB so is development in the countryside, however, it is adjacent to existing developed land, an existing SANG and is closer to the village facilities.

The proposal doesn't align with policies in the Draft Local Plan. Exhaust brownfield sites first, before greenfield.

Land to the west of Liphook must be considered for development instead of adding more to just one part of Liphook. It is not clear why the SDNP boundary around Liphook should trump an emergent demand for a holistic, sustainable and integrated plan for additional housing the village.

Representations have been received from a number of statutory consultees as well as other interested parties.

HCC will require off-site contributions for a connection to the SANG to the west of the site.

The ICB has stated that developer contributions would be required towards projects to increase capacity at Liphook Village Surgery.

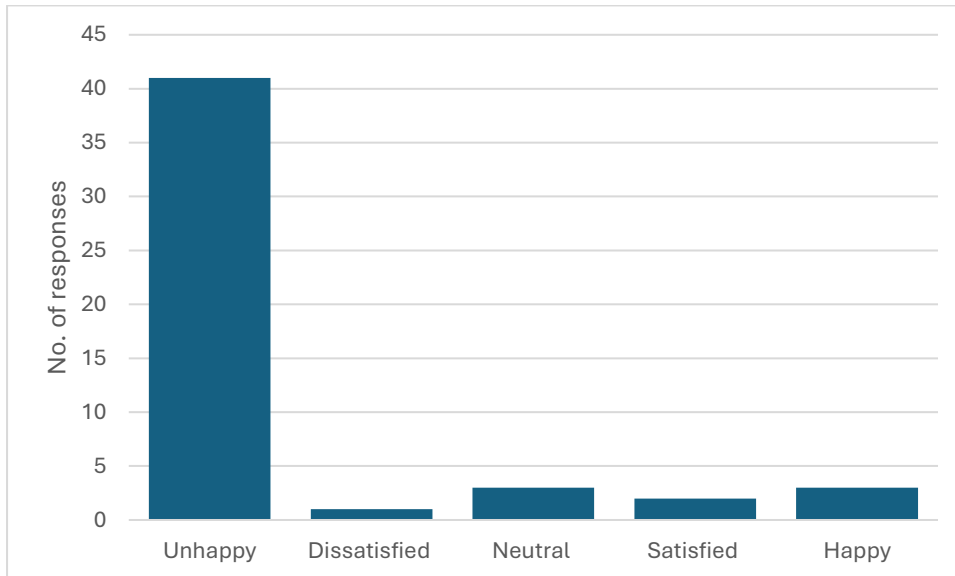
Thames Water do not envisage infrastructure concerns regarding wastewater networks.

Bramshott & Liphook has raised concerns about housing density and that it would lead to an identified vehicle pinch-point. However, it is noted that the site adjoins the Settlement Policy Boundary and follows the linear development pattern and is cohesive.

South and East Liphook Residents' Group considers that the site is contrary to policy NBE1 due to its location but notes that it is adjacent to developed land and an existing SANG. They consider that the site is a good choice but question the reduction of homes by 50%. On the basis that the points raised are taken into account, no objection is raised to the proposed site allocation.

A couple of individual representations question the reduced housing density when it could help contribute and reduce housing density at other sites, but generally agree that the site is the most appropriate of the three proposed site allocations.

Question: Site LIP3 Land at Chiltley Farm - How do you feel about this site?



Question: Site LIP3 Land at Chiltley Farm - What are your comments on this site?

There were a few supportive comments regarding this site proposal citing good transport links and infrastructure, and the site being a logical extension of the Berg. Some general comments about Liphook being a suitable place for more homes, given the station, services and facilities.

Comment that it would be better to build here than on green spaces.

New homes in Liphook will help support the existing facilities and shops.

However, most of the comments raise concerns about this proposal. Many respondents felt they were being asked to comment again on this site having done so a few times before, and feeling that despite many objections nothing has changed and the site keeps being proposed. Many querying why when rejected, this site is still being proposed.

Comments that this is not a sustainable location for development as it is on the wrong side of Liphook, it would be car dependant as people could not walk to the centre and schools. The site does not provide a genuine choice of transport mode. The site has a low accessibility rating (The Draft Local Plan states that the site scores above average in the Local Planning Authority's Accessibility Study but on closer inspection it actually scores 5/8 which is not above the average). The site doesn't meet the principles of 20 minute neighbourhoods. If it were allocated, an active travel link for pedestrians and cyclists over the railway line is needed. This land offers the only viable link over this rail line with council or network rail land on the north side and a clear link to amenities. Securing this link will enable the site to conform with emerging Neighbourhood Plan policies for a walkable neighbourhood, which align with HCC Draft Travel Plan and EHDC sustainability agenda.

This is agricultural land contributing to food production and it is wrong to claim it is brownfield.

The proposed development would not be in keeping with the character of the area, and the housing area adjoining is a Site of Special Housing Character and has special protection.

The proposed density is too high, and if allocated, needs to be much reduced. There is some confusion amongst respondents as to how many homes are being proposed.

There is only access via Willow Gardens. The main entrance to the estate is already difficult to leave from due to poor visibility. There is concern the residents of the new homes will park on the roads of the existing homes, which will affect safety.

A lot of comments raised concerns about the ability of existing infrastructure and services to cope with new homes. More homes are putting increasing pressure on services and facilities and Liphook can't cope with any more homes and this level of development. Medical facilities are insufficient, schools are oversubscribed. Water supply, drainage and sewage are unable to cope. The site has no opportunity to connect to the existing foul sewer network other than via the already overloaded system in Ash Grove and along to the flood-prone Midhurst Road. Thames Water has acknowledged that the network is already at capacity and no additional facilities can be provided. Any developer must ensure that capacity is available and fund in advance any upgrades required. Without that, the proposal will be contrary to policy NBE8. Electricity cuts have been due to a booster station failing and water pressure varies.

Also many concerns about congestion and traffic, particularly in the centre of Liphook. Suggestion that a new one way or circular system within Liphook is needed. No new homes should be allowed to the south of Liphook until the roads are improved around the centre. Liphook is in need of a relief road. Peak hour traffic surveys are needed.

The section of road between Chittley Way and Station Road is narrow and has two bends which means that cars often encroach onto the other side of the highway. The Midhurst road narrows down to a dangerous c4.8m width in the section of bends between Chittley Way and the railway bridge. The UK Highway Agencies guidance is for each lane to be 3.75m which means a recommended width of 7.3m for a 2 way road with extra width at bends to allow long or articulated vehicles to proceed without encroaching into the other lane. In this section the pavement narrows down to 1.2m. Inclusive Mobility (2002) advises that ideally the width of the footway should be 2000mm to facilitate two people in wheelchairs to pass each other comfortably. Need to widen and straighten this section of road before considering any development on this site. If two HGVs meet then they are not able to pass without one mounting the narrow pavement. This narrow dangerous section of road and associated pavement cannot handle significant increases in traffic or construction traffic or pedestrians with buggies or wheelchairs.

National Policy CP48, 102, requires that transport issues should be considered from the earliest stages of plan making and development proposals so that (a) the potential impacts of development on transport networks can be addressed and (c) opportunities to promote walking, cycling and public transport use are identified and pursued. This has not happened. The impact of the development of the site on transport networks has not been addressed in

the Local Plan and the traffic problems that will be created by this development will not promote or support walking, cycling or public transport.

Comment that the Local Plan should identify the extensions and new floorspace that is needed to schools and health facilities to support the growth planned.

The site needs to be supported by SANG. This is a critical issue and currently unresolved. SANG cannot be provided on site. There is no credible location nearby.

The site currently floods (including surface water flooding) and development will make this worse. There is flooding at the railway embankment and Network Rail has already raised this as an issue.

The proposed development will have an adverse impact on the landscape character and negative visual impact.

The proposal is itself contrary to many policies in the draft Local Plan, and takes no account of the emerging Neighbourhood Plan. It is not possible to remedy these breaches of planning policy. The site has repeatedly been refused planning permission for these reasons.

As an alternative, Bohunt Manor is suggested with comment that EHDC should be stronger with the SDNP. There are other possible sites to the west of Liphook that should be progressed which meet the Principles of the '20 minute' neighbourhood (i.e. 10 minutes each way). They are much closer to the centre of Liphook than LIP1 and LIP3 and would have less impact on traffic in the centre of Liphook.

A few general comments saying Liphook doesn't need any more new homes, and nothing has changed since commented before. Housing need is being driven by Government, and as part of levelling up, should be built further north. The site isn't suitable for affordable housing, and brownfield should be built on first.

HCC Highway Authority have stated that enhancements to pedestrian, cycle and public transport provision will be required as part of the development and have suggested amendments to the wording of the text to support this.

The Environment Agency responded in relation to the site posing a risk of contamination, (and a history of this on the site). It was suggested that to ensure that the planned development doesn't pose unacceptable risks to the water environment, a site-specific policy should be developed to enforce contamination investigation along with a remediation strategy and verification process.

The NHS ICB note that developer contributions (e.g. by a s.106 contribution) will be required towards projects to increase capacity at Liphook Village surgery.

The SDNPA has expressed that due to the location of the site within 5km of the Wealden Heaths Phase II SPA and in the setting of the SDNP, it will be essential that any allocations sufficiently avoid or mitigate and potential direct or indirect harm to the SPA. They have suggested that the design of any such development should be landscape-led.

Bramshott & Liphook PC question the proposed housing density and public transport provision to support connectivity. It is noted that there is potential for cycle and walking to the train station and buses but has raised safety concerns over narrow pavements and pinch

points, particularly for those with additional mobility requirements. Midhurst Road Rail bridge and approaches to it would require traffic calming and footpath/crossing improvements. There would also be a need for additional community facilities. It is also suggested that homes would be expected to be Net Zero. The use of design codes has been highlighted as being necessary to ensure that development integrates with adjoining developments. Bramshott & Liphook PC note that the site is adjacent to a SINCR and there is a Tree Preservation Order and question open space needs.

Requirements from the emerging Bramshott & Liphook Neighbourhood Development Plan have been highlighted as matters for consideration.

Lynchmere PC have suggested that should the plan to development the site go ahead, there should be no vehicle access from it onto Chiltley lane and Devils Lane.

South and East Liphook Resident's Group strongly object to the proposed site allocation for the following reasons;

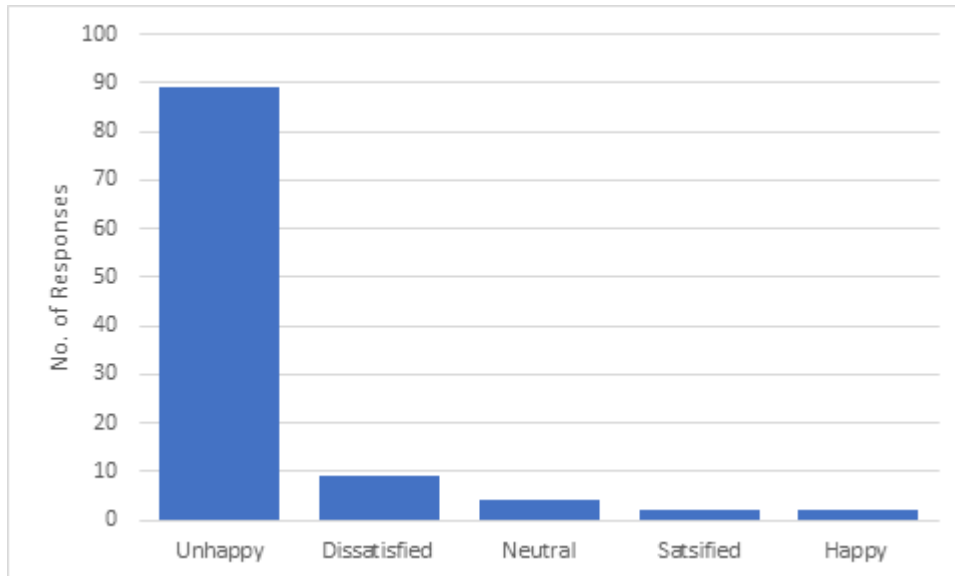
- The existing use is a much-needed agricultural business,
- Potential for adverse landscape and visual impacts,
- The site is located outside the SPB,
- High housing density,
- The site scores below average despite scoring above average in Local Planning Authority's Accessibility Study
- The site will require the provision of SANG but will not be able to do so
- Extensive surface water flooding on site
- Unable to connect to existing foul sewer network other than via the already overloaded system in Ash Grove and along to the flood-prone Midhurst Road
- Previous objections have been ignored
- Previously refused planning permission

It is not a sound housing allocation and would be contrary to the National Planning Policy Framework (December 2023).

Various individual representations received raise objection to the proposed site allocation for similar reasons including the detrimental impact on the Berg estate, the site is not a brownfield site, the existing residential road network is not adequate, adverse impact on the rail bridge and poor access.

The site promoter supports the sites inclusion, confirming its suitability, availability and deliverability. The site is currently subject of a planning application for up to 100 dwellings with on-going discussions with the case officer. The site promoter confirms that a number of identified issues have been addressed in the planning application such as flood risk, access, traffic, landscape, noise, heritage, agricultural land quality, infrastructure requirements, quantum of development and design.

Question: Site CFD1 Land at Clanfield County Farm - How do you feel about this site?



Question: Site CFD1 Land at Clanfield County Farm - What are your comments on this site?

The main comments expressed were in regard to a lack of infrastructure in Clanfield, primarily the doctor's surgery and schools. Concerns were raised that the Plan includes reference to recommending a new surgery however there is also a need for more GP's. The local health authority letter on planning application 60033 - 117 dwellings at Five heads road, states that the existing doctors' surgeries are 144% oversubscribed. Similarly, comments included that there is no capacity at the primary or junior school and local secondary school. Also, that there is no space to expand the existing schools and there is no secondary school in Clanfield.

There were many highways' concerns raised, that the increased volume of traffic will likely worsen existing bottlenecks and traffic accident blackspots, posing risks to pedestrians, particularly young children and their parents accessing local nursery and primary schools. It was considered that there is limited public transport links, only one bus service, and limited parking, particularly around the local shops in Clanfield. There was mention of the Drift Road /Red House Lane /Downhouse Road/ South Lane junction close to the site being an accident blackspot and that the introduction of another junction nearby will increase the accident risk. Concerns were also raised about the entry and exit onto the A3, that they are short and dangerous, and additional traffic will add to the problem.

There were many concerns that development of the site would erode the gap between the old and new parts of Clanfield. That the site has maintained a natural gap and development would change the character of the land and erase the distinctive characteristics, damage the rural character and historic integrity of the village.

The land is not flat – it distinctly rises up in the middle of the site. (photos provided in individual PDF #3). Concern about impact on the landscape, and loss of privacy for existing residents, noise and air pollution and impact on security.

Further concerns raised included how the Plan doesn't meet the strategy, that Clanfield is subject to further development given its categorisation of a Tier 3 settlement with a lack of facilities including supermarkets, banks, leisure facilities and dentists. Comments included that a sustainable strategy should prioritise housing and employment in well-connected locations, focusing on Tier 1 and 2 locations.

There were concerns raised about the adverse impacts on ecology and biodiversity. The site has a diverse array of flora and fauna, including Skylarks and bats. The site adjoins a SINC.

The site is farm land.

It was noted that development of the site would increase the risk of flooding along South Lane and the bottom of Pipers Mead.

A comment was made that there was a covenant on the site. The land was bequeathed by the owner "for the people of Clanfield for the use of the people of Clanfield".

Some comments supported the proposed pavements along South Lane, whilst other comments stated that creating a footpath from the development to close by services, fails to appreciate the character of this rural setting.

There were very limited comments of support for the site.

Environment Agency

Source protection zones 2 and 3, principal aquifer, surface water /and or groundwater flooding.

Groundwater Protection - The site is in the SPZ2 for Havant and Bedhampton Springs. Which provide a strategically important public water supply. Due to the sensitivity of this particular zone, and increased prevalence of Karst known to be present in the wider SPZ, additional scrutiny, assessment and safeguards may need to apply to any development.

Surface water /and or Groundwater Flooding - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.

HCC Highways

Consideration should be given as to how residents would access local facilities by sustainable modes. All modes access onto South Lane should be supported by a pedestrian link (possibly cycle subject to review of PROW status) to footpath 052/1/1 to the north of the site which could provide a connection onto Sunderton Lane and onwards into the village centre and Infant School to the east and north as an alternative route to Clanfield Junior School.

South Lane does not currently have any cycling facilities and does not have a footway on its eastern side. The development would be expected to provide a footway on eastern side of South Lane as well as a suitable crossing point for access to the north-bound bus stop on South Lane.

HCC education

See rep for requirements.

Integrated Care Board

The Clanfield Practice is occupying premises that that are no longer fit for purpose and have no capacity for expansion. In the short term they are exploring possibility of a very small narrow extension on the side of the building or purchase of residential dwellings to increase capacity on the current site. Longer term there are discussions with LA and housing developers regarding the possibility of new build surgery site linked to future local housing development.

Natural England

Solent designated sites (SPA/SAC/Ramsar)

The site allocations listed below fall within the Solent catchment area and are subject to demonstrating robustly that they achieve nutrient neutrality, in accordance with Policy NBE9. We advise that you make clear use of Natural England’s latest guidance on achieving nutrient neutrality for new housing development (January 2024). This guidance has been published alongside an updated nutrient calculator. Please see further information in later chapters and our HRA comments regarding nutrient neutrality.

Nutrient budgets and assessment, and any nutrient mitigation proposals must be agreed with Natural England and securable in perpetuity.

The following sites fall within close enough proximity to the boundary of the South Downs National Park that they could have potential negative impacts to its landscape features and special qualities and must therefore consider Policy NBE10. We advise that you seek the views of the landscape advisor/ planner for the National Park for their knowledge of these sites and the wider setting, together with the aims and objectives of the park’s management plan and how this can be considered through the Local Plan.

Natural England advise that the Council need to undertake a landscape assessment/ landscape and visual impact assessment (LVIA) to demonstrate that these site allocations are deliverable in their current locations. The Plan correctly identifies that landscape impacts should be considered across these allocations, yet it does not conclude that the Council has conducted its own assessments to justify the sites. Given the scale of some of these developments and the varied topography across the Local Plan Area, Natural England recommend that a landscape assessment to underpin this Plan is necessary. We would expect appropriate consideration through the Plan to further the purposes of the National Park’s protected landscape features, characteristics and special qualities.

SDNPA

The sites are both in the setting of the SDNP and on sloping land which face towards the SDNP. The sites will require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to: landscape character; views; tranquility; and dark night skies. It is important to note that any potential mitigation should not be solely reliant on screening. In order to achieve a landscape-led approach, with the associated necessary evidence, development must respond to settlement pattern, adjacent built form, and the role each site has as part of the setting of the SDNP. As part of the above, any allocations will need to include policy criteria to ensure that the:

Views to/from the SDNP, PRoW and other viewpoints are fully considered;

- Design and layout responds to the location in the SDNP's setting; and
- Lighting is appropriately designed given the proximity to the dark night skies core and Clanfield Observatory

Reasons - South Downs International Dark Sky Reserve (IDSR); and NPPF Paragraph 182

Southern Water

Southern Water is the statutory wastewater undertaker for Clanfield. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure.

Proposals for 100 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our suggested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.

Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF)

and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.

Having regard to the above, Southern Water proposes the following additions to the Infrastructure Requirements of CFD1 (new text underlined):

On site drainage: the site is highly compatible with infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate flood risks. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.

Portsmouth City Council

The SEHRT programme is identified in Transport for the South East's Strategic Transport Investment Plan and is referenced in the 2023 PfSH Spatial Position Statement (as one of the mass transit networks serving the city regions in South Hampshire identified in paragraph 6.20). It has been identified by partners across the Portsmouth city region as one of the major sustainable transport interventions that is required to ensure new development in the area supports shared objectives including reducing carbon emissions and reducing car dependency. PCC notes that the draft EHDC Local Plan proposes to allocate around 616 dwellings in the area south of the South Downs adjoining Havant/ Waterlooville (141 north of Havant and 476 in Clanfield/Horndean/Catherington areas). These sites will be within the Portsmouth Travel to Work area and, based on travel patterns from existing developments adjacent to these sites, are likely to generate travel demand towards Portsmouth. The proposed allocated sites for many of these dwellings will be close to the SEHRT corridors (particularly PortsmouthWaterlooville- Clanfield/ Wecock Farm) and some (most notably land at Drift Road - site CFD2) will be located directly on the SEHRT network.

The draft EHDC Local Plan does not currently recognise the SEHRT programme or network. PCC believes it is a relevant transport intervention/mitigation supporting development in the areas identified above. PCC requests that Policy DC1, and potentially some of the site/ allocation-specific policies, are updated to make reference to the SEHRT programme/ network and the relevance of this to some of the allocations identified.

HCC as landowner

Hampshire County Council as landowner supports the inclusion of this draft allocation and confirms this site is available, suitable and achievable to deliver a minimum of 100 dwellings.

Hampshire County Council has undertaken a series of technical assessments and ongoing engagement with the District Council and key stakeholders to bring the site forward for development in a timely manner. To date, these studies all demonstrate the site is suitable for residential development, and that any issues or sensitivities can be accommodated through an appropriate design response and mitigation measures.

These studies comprised of initial advice on flooding, drainage and landscape impact, which helped shape the emerging proposals for the site in earlier iterations of East Hampshire's Local Plan consultations.

The delivery of minimum 100 dwellings would require circa 0.78 hectares of public open space in accordance with open space standards set out in Policy DGC5. This would result in a net site area of 3.75 hectares, and a net density of 27 dph. Based on the average net density of infill sites in recent years, this could increase a net site capacity to approximately 110 dwellings, taking into account a small increase in the public open space policy requirement. The land budget calculation is presented below:

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

Based on these calculations, the site is considered to have potential to deliver minimum 100 dwellings.

As landowner, Hampshire County Council recommend that the following amendments are made to Policy CFD1 Land at Clanfield County Farm: 'The site is likely to accommodate a minimum of 100 dwellings.'

This would ensure a more effective contribution to the supply of housing required over the Plan period for the borough and be in line with draft Policy DES3 'allocated sites must optimise the density of new residential uses through making an efficient use of land, whilst delivering a contextually appropriate and coherent built form.'

Hampshire County Council, as landowner, is keen to continue working with East Hampshire District Council as part of its responsive approach to strategic land promotion. The County Council looks forward to receiving feedback on the draft allocation Policy W&B7 and Policy CFD1 and to support the delivery of the District Council's housing and community infrastructure needs as effectively as possible, in the next stages of the emerging East Hampshire District Council Local Plan.

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

Clanfield County Farm (Draft Policy CFD1)

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

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

Flood risk

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

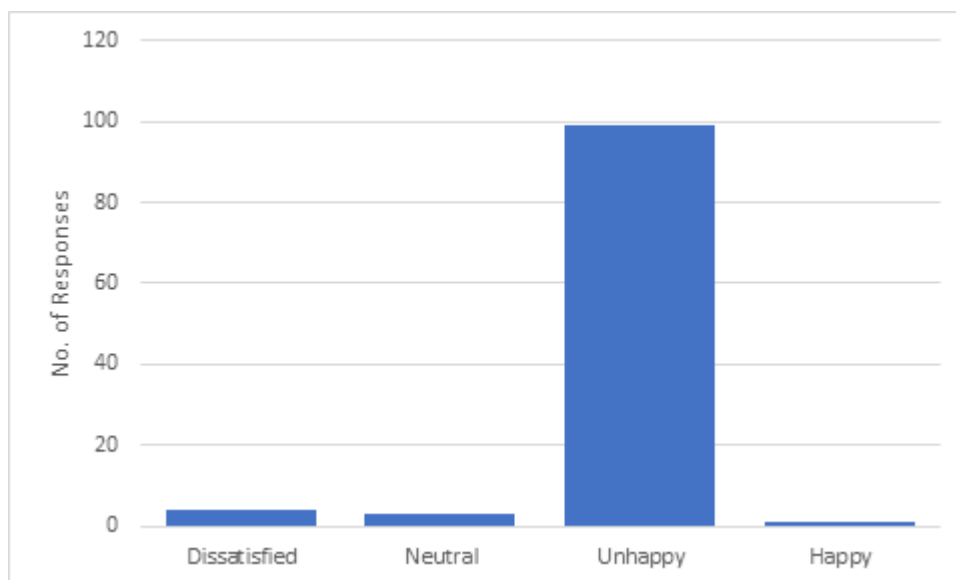
Under the current Planning Practice Guidance (which was significantly strengthened in August 2022) the LPA will be obliged to subject allocated sites to a Sequential Test for Flood Risk, where safe access/egress cannot be achieved due to a flood risk from any source (not just fluvial / sea flood risks).

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

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

Both of the draft allocated sites in Clanfield (CFD1 and CFD2) also raise concerns in relation to flood risk. The Council will be required to undertake a sequential test for these sites. Land south of Chalton Road is sequentially preferable in flood risk terms.

Question: Site CFD2 Land at Drift Road - How do you feel about this site?



Question: Site CFD2 Land at Drift Road - What are your comments on this site?

The site is within an area where there are already recognised community facilities as well as easy access to established bus routes, and as such there is an existing infrastructure already in place.

Concern that this would be the start of the whole field being built upon. No more housing is needed in this area.

This is not a sustainable location for development – there are no jobs in the area and it will be car dependent.

The site is not in Clanfield, it is in Catherington.

There is considerable concern about the erosion of land within the local gap between Clanfield and Catherington. Residents were promised the gap would remain. This development will lead to further proposals for development in the gap. The land has been designated part of the local gap to protect from it overdevelopment. The location also provides a strategic gap between Old Clanfield and the new developed parts of the village. This will be lost if the housing is approved and would eventually lead to the whole field being included for future development up to the border of the South Downs National Park and Clanfield Village becoming just another urban sprawl alongside the A3. The proposal doesn't comply with the Gap background paper.

There is similar level of concern about the impact of development on local infrastructure, particularly local roads, doctors surgery and education. Many comments saying the existing surgery is already under pressure and cannot cope. The local health authority letter on planning application 60033 - 117 dwellings at Five heads road, states that the existing doctors' surgeries are 144% oversubscribed.

The roads cannot take any more traffic, and are not in good condition. General traffic flow through the village is high. The roads around the infant school are already unsafe, the amount of traffic between the two schools is very high. The development will cause a significant increase in traffic. There isn't sufficient school places available, particularly causing secondary school students to travel. The existing two schools in the village do not have space to expand. There are also limited local shops, parking is at capacity at the shops. White Dirt Lane is very narrow and only single vehicles can use it at any one time.

There is poor public transport access to the mainline railway station at Petersfield (once an hour bus Monday to Saturday) and no public transport to Rowlands Castle railway station.

The air ambulance uses the field to land.

The site includes pylons which may well be a health hazard. Sewerage and drainage also ought to be considered.

Water pressure is poor.

When Southern Water cannot meet legal requirements for discharge of foul and storm drainage as it is. Query about how main sewer capacity can be increased to accommodate the extra flow? Back in 2010, when the Windmill View Development in Green Lane was approved there was a requirement for a new 7.2m sewer extension, however this requirement was subsequently reduced to just a new length of sewer running from the site along Green Lane until it was combined at the Drift Road cross roads. Since then 500 houses have been built off Green Lane and the main sewer which runs down White Dirt Lane must now be at its very limit of capacity.

Concerns about access to the site; access could only be achieved from two busy roads which is likely to add to the existing traffic burden and poorly maintained road surfaces. White Dirt Lane which is a C road.

With regards to reference to a new GP surgery on the site, however comments express scepticism about the ability to deliver this, particularly with regards to funding (querying past S106 funding for health and how that has been spent). Comments saying this suggestion is too woolly. The medical centre would need to be built before the new homes. These proposals in Clanfield should be refused based on inadequate health facilities.

Comments have supplied information about flood risk and drainage, noting that there is flooding on White Dirt Lane/bottom of White Dirt Lane, more so on a regular basis – stating that development will increase flood risk. The bottom of White Dirt Lane has historically been a collection point for surface water and no amount of remedial work has been able to solve this. Climate change will make this worse, and past promises to mitigate flooding have not been kept. Southern Water have made recent attempts to clear and replace drains, however, they have told residents the excess water is draining into existing sewers that are insufficient for existing housing, which leads to frequent effluent discharge into Langston Harbour. There isn't a solution to this problem.

The chalk slope continues to rise beyond the western site boundary, therefore the new houses themselves will be affected by the runoff from the thin downland soil. The grading of the chalk debris at the bottom of the slope is already testimony to this.

Concern about water quality and contamination. The site is in a Groundwater Source Protection Zone. Query what provision there will be to filter surface water from tyre residue, petrol, diesel, oil, contaminates, etc to protect the water course. This type of contamination is now a major issue across the country.

Concerns about the loss of more countryside around Clanfield. The current green, open nature of the public footpath would disappear. Uncontrolled destruction of the beautiful countryside is against the green policies in the draft Local Plan. The development will intrude into the countryside with consequent loss of wildlife and farmland (Grade 3 soils).

The site supports local wildlife - deer, badgers, hedgehogs, slow worms and their food chains. This development will destroy the biodiversity and natural habitats of many native animal and plant species that reside in the South Downs. The field is prime agricultural land used for cereal and oil seed ripe crops and supports diverse species of wildlife in the field and on its hedgerow borders protected under the Wildlife and Countryside Act. The local insect population such as butterflies native to the South Downs will also be impacted.

There is a concern about the loss of farmland. It is currently arable land and therefore a limited resource, as such using Grade 3 agricultural land is short-sighted. There is nothing in the Draft Local Plan that addresses the loss of farming land.

Many comments discuss how the village is changing, with concerns about the impact of more development on the character and landscape of the village; turning the village into a town. The identity of Clanfield is being lost.

This site is an elevated and very visible field which can be seen from a large part of the surrounding area. It is a beautiful landscape. The idea of a Local Gap may still appear on a map, but because of the land contours the new development will be seen to extend to the top of the hill. This is an ill-considered location and there are better options in the Village which do not impact the view across the countryside from every direction. Cannot suggest there will be no visual impact – there will be.

The footpath is a beautiful walk as it is, it would be changed to walking through a housing development. The footpath links a historical route to New Road, these historical rights of way

should also be preserved (without diversion) to maintain the characteristics of the land. The footpath is well used.

Development will have a negative impact on the setting of the South Downs National Park.

With regards to heritage; Catherington is a conservation area and its surroundings should be protected. Our historic, Listed buildings were not built to sustain the amount of heavy traffic that has occurred since the Down farm development

Development will obscure views from Godwin Crescent, and cause additional light and noise pollution.

Many sites proposed are in contradiction in the policy objectives and vision presented in the plan. This policy response does not deliver the vision for our residents to be able to live in healthy, accessible, and inclusive communities, where quality affordable homes, local facilities and employment opportunities in sustainable locations provide our communities with green and welcoming places to live, work and play. It does not deliver Objective B: Providing better quality, greener development in the right locations. The site should not have been chosen as it contravenes the Local Plan paragraphs 5.99 and 5.100.

New opportunities for housing should be considered where there is appropriate infrastructure and services. Properties should be built on the outskirts of Petersfield. There are plenty other brownfield sites.

Environment Agency

Source protection zones 2 and 3, principal aquifer, surface water /and or groundwater flooding.

Groundwater Protection - The site is in the SPZ2 for Havant and Bedhampton Springs. Which provide a strategically important public water supply. Due to the sensitivity of this particular zone, and increased prevalence of Karst known to be present in the wider SPZ, additional scrutiny, assessment and safeguards may need to apply to any development.

Surface water /and or Groundwater Flooding - We would refer you to Hampshire County Council as the Lead Local Flood Authority for comment on Flood risk associated with Surface Water and Groundwater at this site.

HCC Highways

For vehicular access from Drift Road, consideration should be given to the safety of a new access given the gradient and curvature of the road. A footway would also need to be provided on the southern side of Drift Road as well as suitable crossing points to connect the development with the rest of the village. Any access strategy would need to have regard to the existing PROW through the site, footpath 119/43/1, and any proposals should seek to improve this PROW and upgrade to provide cycle as well as pedestrian facilities. Subject to the necessary regulatory tests being met, the County Council will also seek contributions for surface improvements to Footpath Horndean 49 running through the proposed site. This will be to County Council Design Standards with an unbound surface, minimum 2m width. It can include diversion of the PROW route through the site as long as it is an enhancement and maintains the connectivity to the wider network. The footpath should be set within a green corridor.

HCC education

See rep for requirements.

Integrated Care Board (ICB)

The Clanfield Practice is occupying premises that are no longer fit for purpose and have no capacity for expansion. In the short term they are exploring possibility of a very small narrow extension on the side of the building or purchase of residential dwellings to increase capacity on the current site. Longer term there are discussions with LA and housing developers regarding the possibility of new build surgery site linked to future local housing development.

National Grid

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets.

CFD2 4VF ROUTE TWR (001 - 190): 400Kv Overhead Transmission Line route: BOLNEY - LOVEDEAN 1

Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. We propose modifications to the above site allocations and/or policies to include wording to the following effect:

CFD2 – Land at Drift Road “2. The development will be developed with the following site-specific criteria j. a strategy for responding to the NGET overhead transmission line present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.” Please see attached information outlining further guidance on development close to NGET assets. NGET also provides information in relation to its assets at the website below. • <https://www.nationalgrid.com/electricity-transmission/network-andinfrastructure/network-route-maps>

Natural England

Solent designated sites (SPA/SAC/Ramsar) The site allocations listed below fall within the Solent catchment area and are subject to demonstrating robustly that they achieve nutrient neutrality, in accordance with Policy NBE9. We advise that you make clear use of Natural England’s latest guidance on achieving nutrient neutrality for new housing development (January 2024). This guidance has been published alongside an updated nutrient calculator. Please see further information in later chapters and our HRA comments regarding nutrient neutrality

Nutrient budgets and assessment, and any nutrient mitigation proposals must be agreed with Natural England and securable in perpetuity

The following sites fall within close enough proximity to the boundary of the South Downs National Park that they could have potential negative impacts to its landscape features and special qualities and must therefore consider Policy NBE10. We advise that you seek the views of the landscape advisor/ planner for the National Park for their knowledge of these sites and the wider setting, together with the aims and objectives of the park’s management plan and how this can be considered through the Local Plan.

Natural England advise that the Council need to undertake a landscape assessment/ landscape and visual impact assessment (LVIA) to demonstrate that these site allocations are deliverable in their current locations. The Plan correctly identifies that landscape impacts should be considered across these allocations, yet it does not conclude that the Council has conducted its own assessments to justify the sites. Given the scale of some of these developments and the varied topography across the Local Plan Area, Natural England recommend that a landscape assessment to underpin this Plan is necessary. We would

expect appropriate consideration through the Plan to further the purposes of the National Park's protected landscape features, characteristics and special qualities.

SDNPA

The sites are both in the setting of the SDNP and on sloping land which face towards the SDNP. The sites will require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to: landscape character; views; tranquility; and dark night skies. It is important to note that any potential mitigation should not be solely reliant on screening. In order to achieve a landscape-led approach, with the associated necessary evidence, development must respond to settlement pattern, adjacent built form, and the role each site has as part of the setting of the SDNP.

As part of the above, any allocations will need to include policy criteria to ensure that the: • Views to/from the SDNP, PRoW and other viewpoints are fully considered; • Design and layout responds to the location in the SDNP's setting; and • Lighting is appropriately designed given the proximity to the dark night skies core and Clanfield Observatory

SDNPA Reasons: South Downs International Dark Sky Reserve (IDSR); and NPPF Paragraph 182.

Horndean Parish Council

This development is in Horndean Parish but is listed as Clanfield. The major concerns here are infrastructure (specifically strains on the Clanfield Surgery), road quality and water run-off. It is known by the EHDC planning team that Clanfield Surgery is at capacity and that attempts to expand it have so far failed. This development and the 100 dwellings at South Lane (within Clanfield Parish) will add to this pressure. 79. The land is currently farmland and is bordered by Drift Road and White Dirt Lane. During heavy rain, the run-off onto White Dirt Lane can cause flash flooding, this would need to be addressed. 80. White Dirt Lane to the south of the site is a narrow road with passing places and high hedgerows and Drift Road is used as a "rat run" between Catherington and Clanfield and is unsuitable for heavy vehicle traffic.

Portsmouth City Council

The SEHRT programme is identified in Transport for the South East's Strategic Transport Investment Plan and is referenced in the 2023 PFSH Spatial Position Statement (as one of the mass transit networks serving the city regions in South Hampshire identified in paragraph 6.20). It has been identified by partners across the Portsmouth city region as one of the major sustainable transport interventions that is required to ensure new development in the area supports shared objectives including reducing carbon emissions and reducing car dependency.

PCC notes that the draft EHDC Local Plan proposes to allocate around 616 dwellings in the area south of the South Downs adjoining Havant/ Waterlooville (141 north of Havant and 476 in Clanfield/Horndean/Catherington areas). These sites will be within the Portsmouth Travel to Work area and, based on travel patterns from existing developments adjacent to these sites, are likely to generate travel demand towards Portsmouth. The proposed allocated sites for many of these dwellings will be close to the SEHRT corridors (particularly PortsmouthWaterlooville- Clanfield/ Wecock Farm) and some (most notably land at Drift Road - site CFD2) will be located directly on the SEHRT network.

The draft EHDC Local Plan does not currently recognise the SEHRT programme or network. PCC believes it is a relevant transport intervention/mitigation supporting development in the

areas identified above. PCC requests that Policy DC1, and potentially some of the site/ allocation-specific policies, are updated to make reference to the SEHRT programme/ network and the relevance of this to some of the allocations identified.

The Fullers Road Residents Group

The PRoW crossing the site is an important link between Drift Road and White Dirt Lane and needs to be kept. The C&O section should reflect this and confirm the importance of this route.

Individuals #1

Detailed rep about gap p.158

The building of 80 homes at CFD2 Land at Dri Road would look to comprise this gap and reduces the sense of arriving / leaving because right now as you move up Southdown Rd currently there is no development to the west of this road. However, with CFD2 It would extend the heavily urbanised area currently contained in Horndean (Downs) across Southdown road and White Dirt Lane and around the existing small development at Godwin Crescent. The local gap and its purpose would then be compromised

The Gap below Dri road currently has a clear boundary of Dri road itself with no development to the south until you get to the shops. There is also a clear boundary of Southdown Road with no development to its west side. What clear boundary are we creating by taking this extra chunk below dri road with CFD2? This compromises the boundary below Dri road and also then we have development to the west of Southdown road – so the clear boundaries of the gap are lost by this development. Also, it seems clear that we are creating a precedent that the gap starts to become a small strip. The Gap becomes a small strip between Glamorgan road area/ Upper part of White dirt land and the edge of the new proposed development. So, if this is the case, surely that leaves us open to having further developments in the fields directly below Dri Road to the west of the new proposed area towards Rumsey gardens? I also note in the “infrastructure requirements” of “CFD2” it states that provision of land of a new surgery should be considered including within the wider area that has been promoted as site HD-010 in the Land Availability Assessment. Checking the “HD-010 area” is the full field below Dri road (see diagram below). So, this of course would then be within the area the local plan is designating as the specific area for the local gap – so here we have the documents contradicting themselves. Either this is considered local gap land, and shouldn't be developed on for this local plan or it isn't? This demonstrates the fears from residents that the local gap will just move as the need continues for the area to take further allocations of housing in the future

Developer rep

Industry professionals #1 Turleys

A missed opportunity in terms of the additional benefits that could be delivered through a larger scheme by extending the allocation further west.

the Site could potentially deliver up to 280 homes along with extensive areas of public open space in excess of policy requirements and a new woodland walk, helping to promote healthy and active lifestyles for new and existing residents. In addition, the allocation of the wider site would allow for a range of further benefits such as additional affordable housing, potential for enhanced biodiversity net gain, increased contributions to local services, and the potential to deliver specific infrastructure (this is considered in more detail below). The wider development of the site would also better facilitate the ability to provide bungalows as part of a more varied housing typology, which Policy H2 indicates there is a clear need for in the District.

Additional supporting information on landscape has been prepared which demonstrates how a wider allocation extending further west can be brought forward without a significant adverse impact on the wider landscape, setting of the SDNP or the Gap designation. The submitted Landscape and Visual Appraisal has informed revisions to the Framework Masterplan previously submitted, with the updated version included within Appendix A of these representations.

there is a realistic opportunity to deliver land for a new GP surgery to assist in addressing the existing capacity issues with the current facility, which my client is aware is a significant issue for existing residents. This would provide a significant benefit to the existing community as well as catering for new residents.

Pegasus Group In support of residential development of Land south of Chalton Lane, Clanfield obo Barratt

From a landscape perspective, the site is entirely exposed on its southern and western boundaries, with no defining features such as hedgerows or existing development to provide a sense of enclosure or definitive boundary to the site. It also bears no resemblance to the existing pattern of built-development in the village, wrapping around existing development at Godwin Crescent which itself already projects southward and westward from Drift Road and White Dirt Lane, albeit now enclosed by mature boundary vegetation. In addition, the site is extremely exposed by virtue of its topography. The site rises steeply from its lowest point on White Dirt Lane, to much higher levels in the west and north-west.

Draft Policy CFD2 acknowledges this: 'there is potential for adverse landscape and visual impacts due to reductions in the open, rural setting of adjacent urban areas. The prominence of land increases from east to west, as the land rises towards a ridge line that lies to the west of the site boundary.'

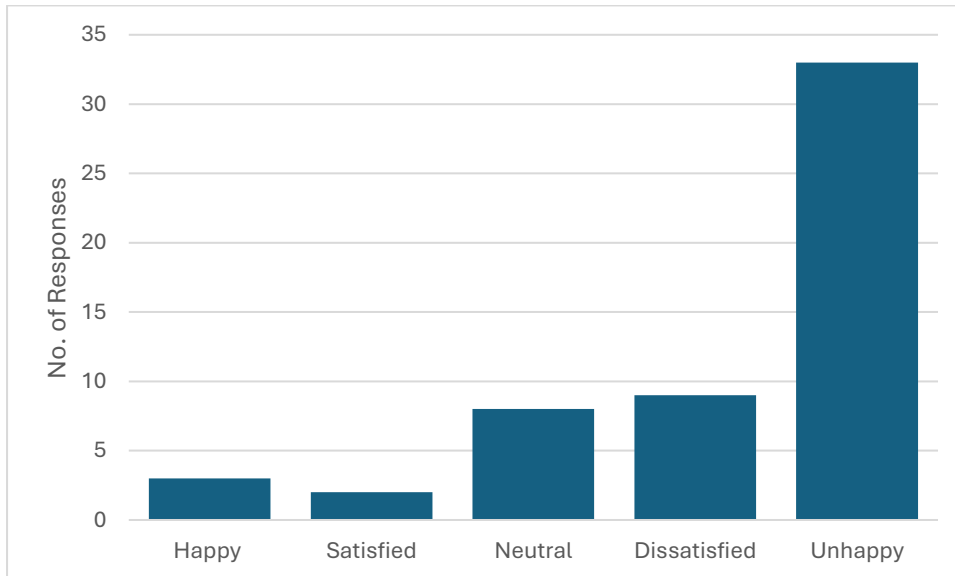
The allocation overall will represent a jarring westward and southward projection from existing development at Godwin Crescent in a highly visible location with a challenging and exposed topography.

These representations find that draft allocation CFD2 (Drift Road) will have a harmful impact on the landscape character of Clanfield. In relation to Clanfield, concern is raised specifically regarding the draft allocation of site 'Policy CFD2', Drift Road, for 80 dwellings, given the landscape harm that will result. It is submitted that this draft allocation should be deleted.

Pro Vision obo Bargate Homes re Penilee, South Medstead (LAA/MED-005)

Similarly, a further 38 homes at Horndean (draft policy HDN3) will erode the narrow gap to the village of Clanfield, which is already less than 100m at its narrowest. A further 80 homes at Clanfield (draft policy CFD2) does not rely on any existing defensible boundary and creates an arbitrary western edge to the settlement which will narrow the undeveloped gap with the village of Catherington.

Question: Site FMS1 Land west of Lymington Barn - How do you feel about this site?



Question: Site FMS1 Land west of Lymington Barn - What are your comments on this site?

Both support and objections were received for this site. A number of issues were raised as a concern over the site, namely: questioning the sustainability of the site; flooding and impacts to the River Itchen; lack of infrastructure; access to the site via Longbourn Way being inappropriate; as well as associated safety concerns for highway and pedestrian users. At the time of writing and during the consultation, the site has a live planning application that is yet to be determined.

Support

Support was expressed for the site in that it is suitably located to existing housing, a suitable site for additional housing growth and could be viewed as a natural extension to the existing neighbouring housing development. The site was expressed as a necessary development required to fulfil the Council's housing numbers, that was suitably located near to local facilities in Four Marks. The sites proximity to the A31 was also seen as advantageous, as it will allow future residents efficient travel to the nearby towns of Alton, Winchester and Basingstoke, as well as these train stations.

It was also stated in responses that future residents of the development site would be provided with a choice of education settings at both primary and secondary level, in Four Marks, Alton and Ropley.

The site could be considered acceptable by some responders if care and attention was given to the access road, protection to wildlife and increasing capacity at the Mansfield Park doctors surgery.

Comments were also received in relation to the development site bringing the likelihood of residents from a certain socio-economic and professional background, that would benefit the local economy and businesses as well as increasing custom for local heritage assets.

Naturally the site promoter expressed support for Land west of Lymington Barn. They are supportive of the delivery of a development which respects the rural edge, introducing a large area of green open space, planting and provision of BNG. The site promoter notes that the Local Plan currently indicates a contribution of 90 homes from this site. It is proposed by Redrow that this could reasonably be amended to approximately 95 homes, which has been proposed as part of the current planning application.

Flooding and water quality

Many comments received made mention that the site and Lymington Barns has vast problems with drainage and surface water run-off causing local residents to suffer from flooded gardens and dangerous roads in the vicinity to the site, such as the passing under the railway bridge causing safety concerns especially when icy or wet. Many expressed concern that the existing flooding surrounding the site will only be exacerbated by impermeable materials used to construct the development. It was claimed that when required, the owner of Lymington Barns has to pump excess flood water out of the estate and onto Lymington Bottom.

Borehole testing is now thought to be needed to be updated and such it was encouraged for this to be re-done, to take into consideration the expected increase in groundwater level.

Concern was also raised by many responses that approximately half of the site is within the catchment of the River Itchen Special Area of Conservation (SAC), and consequently is sensitive to nitrate and phosphorous pollution, with specific mention being made to the local geology and the potential detrimental impacts by groundwater. Respondents did not feel there was adequate evidence produced for the site to show that the site would not pose a threat to the nitrate and phosphorous levels of the River Itchen, and thus the Solent too, as nutrient neutrality has not been proven leaving concern for the water environment and levels of biodiversity. The Environment Agency responded to the consultation and specifically stated that the Land west of Lymington Barns site should have a site specific policy to ensure contamination to the water environment does not pose as a risk, by the policy ensuring a contamination investigation and remediation process is undertaken. Natural England also provided a response to the consultation with regard to this site and stated that phosphorous is currently a limiting factor within the River Itchen SAC and as such development within its catchment must demonstrate how it meets nutrient neutrality for the lifetime of development for both nitrogen and phosphorus. Natural England also stated that they did not believe that the Council has taken into account both FMS-1 and FMS-4 allocations when assessing that no Likely Significant Effects (LSEs) would be caused from these developments on the River Itchen Catchment. Natural England therefore disagree with the assessment of LSEs and wish to see this evidence re-done and that any appropriate mitigation is sufficient.

Consequently, responses were received from the development industry questioning the inclusion of this site in the Local Plan, when approximately half of the site is constrained by being in the River Itchen catchment. Nutrient neutrality is possible to achieve but it is questioned why other less constrained sites in Four Marks were not allocated for future development prior to Land west of Lymington Barn. It was suggested by developer responses that a simple way to overcome the constraint of the River Itchen catchment, is to reduce the size of the site to exclude the part in the catchment and thus also reduce the number of proposed houses to approximately 20-30 homes.

Environmental

The site is thought to contain rich diverse habitats, especially along the railway corridor. Responses stated that the hedgerows and trees in this area have large amounts of wildlife: deer; hedgehogs; squirrels; slow worms; and multiple birds including red kite, owls and woodpeckers. It is questioned how biodiversity net gain would be achieved for this site once it has been built on and the biodiversity disturbed. Ecological assessments previously undertaken are believed to have missed a lot of information and has not been picked up properly in planning applications. Comment was also made that the site should be fully set back from the wildlife corridor surrounding the railway line and that mitigation measures are included to reduce light and noise pollution.

It was recommended that EHDC doubled or tripled the amount of required green space for this site, as a form of mitigating the damage the site would cause on the settlement of Four Marks.

The site promoter stated that the latest BNG calculations, when assessed against the illustrative masterplan for the site, are well in excess of the required 10% gain. The site plans to make a positive contribution to biodiversity enhancement and this is reflected by the large provision of green infrastructure included within the emerging plan for the site.

Settlement policy boundary and design

It was commented, multiple times, that the site is a greenfield located outside of the settlement policy boundary of Four Marks and is part of the countryside. The site is predominantly bounded by the Watercress railway line and the countryside. It is also recognised by many individuals that the site did make up a part of a much larger development site, that was formerly subject to an EHDC large sites consultation. Consequently, many individuals made comment that if the site was to be approved then it is likely to cause further applications to come in to the west, with Four Marks expected to expand in the direction of Winchester, but with a potential large development separated from the rest of Four Marks by the railway line. There is concern that piecemeal development will occur, with no overall design for a larger area. However, some support was expressed for a larger development eventually occurring, as this would end the small parcels of development occurring.

Comment was made that the proposed layout, by reason of its scale, density and design, fails to respect the rural edge character of the area or incorporate green infrastructure and areas of open space. Instead the sites design results in a cramped form of development that fails to respect the character of the area.

Access, transport and sustainability

Comments were made about how the site will generate an increase to existing congestion at highway junctions in Four Marks and that it is positioned unsustainably in Four Marks. Comments were received to how the site is located a distance from the main services in Four Marks, with statements expressing that the main services was over a 20 minute walk from the site and the school a 30 minute walk, with Mansfield Park surgery being the only local facility. Thus, many responders shared the opinion that the site will be a mainly car focused development, with parents driving children to school, exacerbating local congestion to the site as well as at the school. e.g. queueing under the railway bridge that currently operates as a give-way shuttle. This give-way shuttle junction under the railway bridge also generated a number of responses, stating that the junction would need to improve to accommodate any extra traffic, with suggestions of traffic lights being required. Comment was also received about how it is likely that Winston Rise / Station Approach will be used as a rat run for access to/from the A31.

The lack of public transport provision was also raised as another reason for the unsuitability of the site and that it would not aid the use of sustainable transport modes, which is contrary to the existing and emerging Local Plan policies. It was also thought contrary to allocate a development that would be car dependent, thus generating greater levels of carbon dioxide and not aiding the Council's fight against climate change.

Multiple comments also highlighted that the local roads, particularly the site access, to the site were thought to be too narrow for highway traffic and any additional traffic generated from the development will make local roads harder to traverse. Concern was also raised about there being adequate access for emergency services and how this currently is reliant on careful parking by existing residents. It was also stated by many that the proposed access to the development was too long and convoluted, with the poor design of the adjacent site meaning that new residents will "have to go round" the houses when coming in and out of their homes. It was hoped that the same design error in the road network of the adjacent development was not repeated again in this proposed site allocation. A suggestion was received for an alternative site access, from Lymington Bottom Road but requiring the removal of an existing property. A single point of site entry and exit was not seen as positive.

Concern was also expressed about Longbourn Way being under private ownership by existing residents and the detriment that construction vehicles would cause as well as additional drivers from the proposed development itself. The private ownership of Longbourn Way was also noted by HCC in their response, specifically highlighting how the private ownership limits the capability of improving any current access arrangements. The site promoter stated in their response that they are working alongside the landowner to deliver enhancements to the route adjacent to the local centre and Longbourn Way, as well as improve the existing access on Longbourn Way.

The amount of pedestrian footpaths in the vicinity of the development site was also thought inadequate, and this comment was also echoed by HCC, for both pedestrians and cyclists wishing to access the site. HCC commented that the footpath on Lymington Bottom Road was currently substandard and that any proposal for this site needs to demonstrate adequate pedestrian and cycle access. Members of the public believe that the lack of footpaths in the vicinity of Lymington Bottom Road and the A31 poses a safety risk to pedestrians, particularly children walking to school or school buses. A response stated that a lack of street lighting in Four Marks would discourage people from walking to/from the proposed site, as well as the site being too great a walking distance from the local facilities and school.

Reference was also made a number of times to how the current planning application for the site had unresolved issues relating to the unsuitability of the proposed site access, with HCC stating that until current constraints of the access via Longbourn Way are resolved, the Highway Authority is unable to support the allocation. Members of the public stated that there are much better sites currently available in Four Marks, which also have live planning applications, that are more centrally located in the village, which provide vastly superior location & connectivity advantages.

Infrastructure

Many comments were received stating that the current infrastructure in Four Marks is lacking and unsuitable for any further residential development in the settlement. This was thought particularly appropriate for the doctors surgeries and primary school in Four Marks, which are already commented to be inadequate. The primary school is currently waiting for an extension to commence to cater for existing pupils, so it was questioned how further pupils from a new development such as Land west of Lymington Barn could also be accommodated. Responses to this site did state that the developer should be made to

contribute to improve existing facilities, specifically an extension to Mansfield Park surgery. The ICB responded to this site by stating that there are current plans to extend both the Watercress Surgery (Mansfield Park), as well as Boundaries Surgery. Boundaries Surgery has recently had a CIL bid approved by EHDC, for the extension and reconfiguration of the premises to provide increased capacity for patients.

The site promoter responded that they are supportive of delivering infrastructure that is proportionate to the scale of the development, as directed by CIL regulations. The site promoter specifically mentioned that they would be happy to contribute to Mansfield Park surgery, proportionately if there was a need, but with the site promoter concluding that there was currently spare capacity.

It was stated by a member of the public that the electricity grid in this area is currently struggling. To relieve pressure on the grid, it was suggested that all new dwellings should be fitted with solar panels.

A member of public also stated that a number of existing residences in Four Marks are still not connected to mains sewers and additionally the mobile phone reception and broadband is poor.

The Environment Agency stated that it is essential that the developer engages the sewer undertaker at the earliest possible stage to ensure that they can provide coverage for any new development. The geological condition of the area would result in very significant challenges and limitations on alternative means of disposal for any foul sewage. There is a significant probability that the Environment Agency would not be able to grant Environmental permit for a new non-mains discharge in this area, particularly if any system cannot meet British standard (BS:6297) method (such as boreholes or other deep infiltration soakaways). If the infiltration system is not sized or designed in accordance with guidance in the British Standard it is likely to concentrate the discharge over a smaller area and/or discharge at a greater depth. This will pose a higher risk of groundwater pollution because it reduces the potential for further treatment of the effluent compared to a drainage field meeting the British Standard. As such, we are far more likely to refuse an environmental permit for such discharges. Our preferred infiltration systems are drainage fields designed in accordance with British Standard B26297.

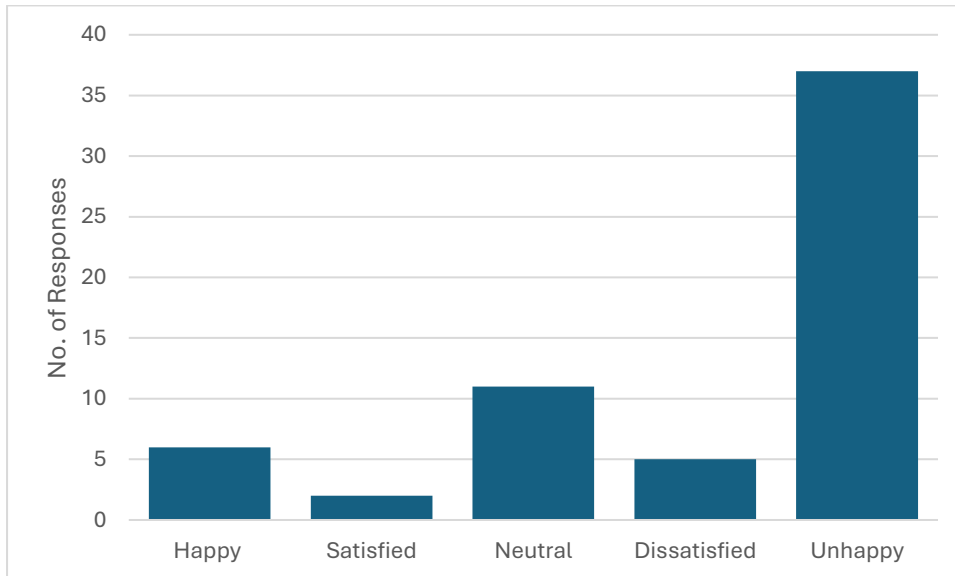
However, Natural England assume that new developments in Four Marks will not be able to be served by a wastewater treatment works and will therefore be served by a private, on-site Package Treatment Plant (PTP). Natural England have uncertainty on where this will ultimately be discharging to, and therefore it is possible that Likely Significant Effects could occur on the River Itchen SAC.

Other

A further objection was made about the noise and air pollution from the construction phase for existing residents, specifically Penrose Way. The previous development on the adjacent site resulted in months of noise disturbance, including at weekends, spoiling enjoyment of home garden amenities.

Response was received suggesting that it would be preferable for the site to the rear of 87 Lymington Bottom to be allocated in the final version of the Local Plan, as the site offers advantages over the site on Land west of Lymington Barn.

Question: Site FMS2 Land rear of 97-103 Blackberry Lane - How do you feel about this site?



Question: Site FMS2 Land rear of 97-103 Blackberry Lane - What are your comments on this site?

Transport

The majority of comments received on this site related to expressions of concern about how it will cause an increase in local traffic and exacerbate existing congestion and safety issues at the local junctions, specifically adjoining the A31 Winchester Road (Telegraph Lane and Lymington Bottom). Many perceive that the proposed development will be car dominant in terms of travel choice, with the main reason being the lack of employment opportunities and services in Four Marks, thus encouraging travel out of the local area by car. Concern was also expressed with regard to the junction of Lymington Bottom with Blackberry Lane and Brislands Lane and how this dangerous junction would be worsened by the additional development traffic, impacting local school children that need to cross this road.

Hampshire County Council echoed opinions on car dominance of the site. HCC also stated that provision of pedestrian crossing facilities and improved bus waiting facilities to the east of the site access should be provided by the developer. The highway authority also would like to see further junction modelling to be undertaken by the developer to understand potential highway impacts.

Consequently, the County Council request that the following wording, or similar, be added to the site policy: 'Development proposals for this site should provide evidence to demonstrate the impact that additional car journeys will have on the local highway network. Developers will be required to provide a contribution towards improving sustainable transport infrastructure in the vicinity of the site'.

Points were made about how the access to the site would be via a steep narrow lane and that currently only one side of Blackberry Lane has a pavement for pedestrian use, impacting road safety. Concern was also raised about whether the proposed access to the site could be financially viable, as it was perceived that to ensure sufficient space for the access an existing dwelling on the street frontage would first need to be demolished. The proposed access road also had a number of comments, stating that it was unreasonably close to the boundary with neighbouring properties.

Medstead and Four Marks Neighbourhood Plan Steering Group stated that with the development there is the possibility of extending a cycleway via Yarnhams Close to Reads Field, to connect with the existing cycleway network between Winchester Road and the Oak Green Parade. Four Marks Parish Council would like to see a cycle connection between the site and the two main areas of services in Four Marks: Lymington Barns and Oak Green.

Flooding

Many comments were raised at how the proposed site could exacerbate an existing surface water flooding issue, that currently leads to Lymington Bottom and down the hill towards the school. Concern was expressed that an increase in flooding could impact surrounding infrastructure and homes. Multiple comments also expressed how the site was not suitable as the land behind Blackberry Lane is in a valley and collects floodwater. There are concerns about the provision of deep-bore soakaways as a form of mitigation as it is thought that the installation would further contribute to flooding issues on Lymington Bottom Road. A representation noted that the LLFA do not regard this as a sustainable solution.

The Environment Agency responded in relation to the site posing a risk of contamination, (and a history of this on the site). It was suggested that to ensure that the planned development doesn't pose unacceptable risks to the water environment, a site-specific policy should be developed to enforce contamination investigation along with a remediation strategy and verification process. The Environment Agency also stated that restriction may be placed on the the uses of deep infiltration systems for surface water drainage.

Settlement policy boundary

Multiple responses commented on the fact that the site is currently outside of the settlement policy boundary for Four Marks. Responses then stated that the proposed residential development would be contrary to local and national policy which seek to focus development in sustainable locations within settlement policy boundaries. It was claimed that the development would be in land defined as 'countryside' by policy CP19 of the Joint Core Strategy and should be protected 'for its own sake'.

Reference was also made to the Medstead & Four Marks Neighbourhood Plan 2015-2028, which states: The inappropriate development of residential gardens, where such development would harm local character, will be refused. Some comments also raised concern that this development would be the beginning of "piece-by-piece" development infilling of land between Blackberry Lane and Alton Lane, leading to a much larger development.

Current planning application

Many comments were received in objection to the development being included in the Local Plan, and made reference to past and current planning applications for this site. Objections described how the site has been promoted for development many times over the last 10 years and has continuously been refused and that these refusal matters still stand., with one being that it is located too far from the main services in Four Marks. It was stated that the current application has pprox.. 100 objections and two outstanding issues relating to flooding and landscape. Comment was also made about a difference between the current application being for 35 dwellings but the Local Plan only allocating 20 dwellings.

Rear of 87 Lymington Bottom Site

Multiple comments were received from individuals and the development industry about a nearby site, 87 Lymington Bottom (currently unallocated in the Local Plan but a current live planning application of 95 dwellings). Positive contributions were stated that could come if both Rear of 87 Lymington Bottom and FMS2 were to come forward. It was stated that development to the rear of 87 Lymington Bottom would contribute to managing flood risk and protecting groundwater and therefore should be considered as making a positive contribution to FMS2.

It was stated how the proposed site to the rear of 87 Lymington Bottom provides an opportunity to provide homes for all by including over 90% smaller homes to meet demographic trends including provision for single story dwellings suitable for older and disabled people, as well as providing for employment and community uses (if required) as well as new public open green space.

Comment was made that the two sites back onto one another and together provide an opportunity to improve footpath & cycleway connectivity centrally in the village through the two sites. It would link the shops and the school together with footpaths 16/1, 17a/1, 20/1 & 20/2.

Infrastructure

It was expressed that the proposal does not contribute to infrastructure in any way and would therefore cause a pressure on existing local services. Consequently comments were made that the developer should be made to contribute towards local amenities and that this should occur before the development is constructed.

It was suggested that this site should instead be used for the Boundaries GP surgery in Four Marks. In relation to health infrastructure the ICB's response stated that developer contributions (e.g.S106 contribution) may be required towards the extension of Watercress Medical, Mansfield Park Surgery and/or of Boundaries Surgery.

Thames Water responded to state that it was not envisaged that infrastructure relating to wastewater of the site was a concern, but encouraged the Council to engage with throughout the Local Plan process. Whereas, the Environment Agency stated that "the geological condition of the area would result in significant challenges and limitations on alternative means of disposal for any foul sewage. There is a significant probability that we would not be able to grant an Environmental permit for new non- mains discharges in this area, particularly if any system cannot meet British standard (BS:6297) method (such as boreholes or other deep infiltration soakaways)."

A play area is not thought necessary on the site as the recreation ground is close by.

Ecology

A large number of comments were made about the proposed site having a negative impact on wildlife by destroying local habitats. Comment was made to how the ecological survey supporting the current planning application for the site, documented the negative impact on: bats; dormice; reptiles (slow worms); breeding birds; and hedgehogs.

It was also expressed that it was not foreseen how the site could achieve 10% biodiversity net gain.

Design and Character

Mixed responses of objection and support were provided for the design of the residential development. Support was provided in reference to a mix of detached and semi-detached

houses will blend well with existing houses and maintain the existing demographic by attracting professionals to the area.

Objection was raised regarding the design due to the site being elevated so will visually appear unattractive and overlook the surrounding residences and area, particularly in Bernard Avenue and Blackberry Lane.

Comments objecting to the development were made in relation to it having a negative impact on the character of the area. It was commented how the existing area is a quiet lane with rural grass and wildlife verges, but the new development will negatively impact this by associated new road layouts and pavements likely to be introduced, removing hedges and trees.

Four Marks Parish Council expressed that the site would need to provide housing that is truly affordable and include greater than 40% social housing, as well as supporting the need for 1,2 and 3 bedroom dwellings.

Support

Support was provided for the site in that it was thought to be a good small scale development that is a good opportunity for providing more houses and if managed well could have a small impact on the settlement. Responses commented on the proposed development being able to give a blend of rural living with access to larger town facilities in Alton, Basingstoke and Winchester whilst also being served by smaller retailers, farm shops and garden centres in Four Marks, Ropley and Alresford. Multiple comments supported this development as increased housing and population in Four Marks will help to sustain the districts smaller villages and towns to help keep High Streets thriving.

It was also stated that this site is in a more sustainable location of Four Marks, compared to other proposed residential developments in the Local Plan and current speculative planning applications.

A developer stated support for the site, especially if it were to be coordinated with the LAA FM-041 development site.

Other

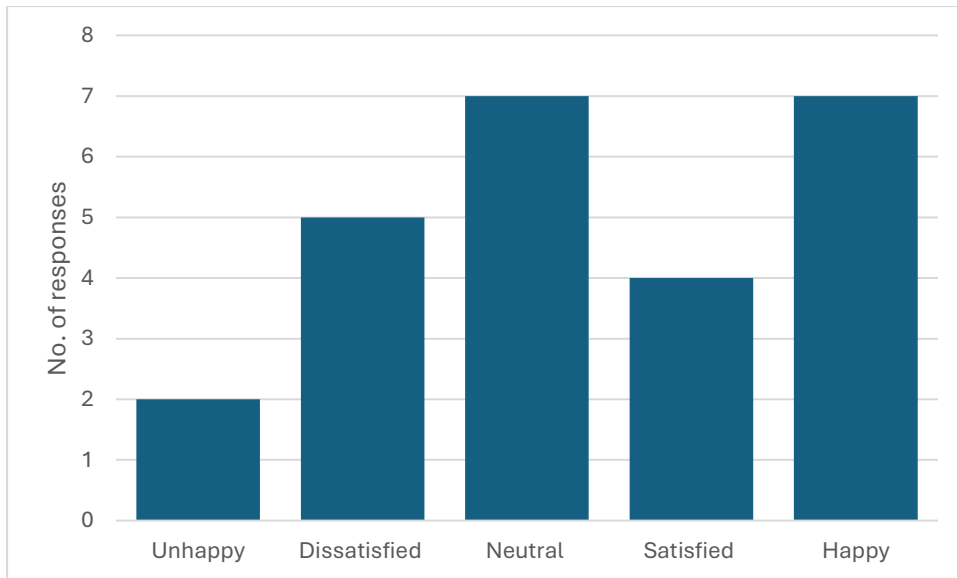
The site description was expressed as being inaccurate. This is in relation to the description stating surrounding dwellings that housing in the site's environs is predominantly of detached houses, but comments stated that the majority of buildings in Blackberry Lane/Bernard Avenue/Yarnhams Close are bungalows.

The site needs archaeological investigation before construction due to it being in proximity to the Roman Road between Winchester and London that forms part of the Pilgrim's Way.

Comment was made that the development will increase light pollution from street lights and that this is contradictory to local policy as the area forms part of the Dark Skies initiative.

It was raised that consideration of the potential impacts of the proposal needs to take into account the potential additional impacts of all the other speculative planning applications in Four Marks.

Question: Site FMS3 Boundaries Surgery - How do you feel about this site?



Question: Site FMS3 Boundaries Surgery - What are your comments on this site?

Quite a few of the comments received acknowledge the need for more capacity (whether on this site or a new site) but have concerns about the amount of parking provision and safe vehicular access. There are issues raised about localised parking on residential streets, and visibility exiting the surgery.

Some comments say this is the wrong location for additional health floorspace, and then a new surgery would be better in a more centralised location, and this site used for housing instead. A comment noting the catchment is large from miles around.

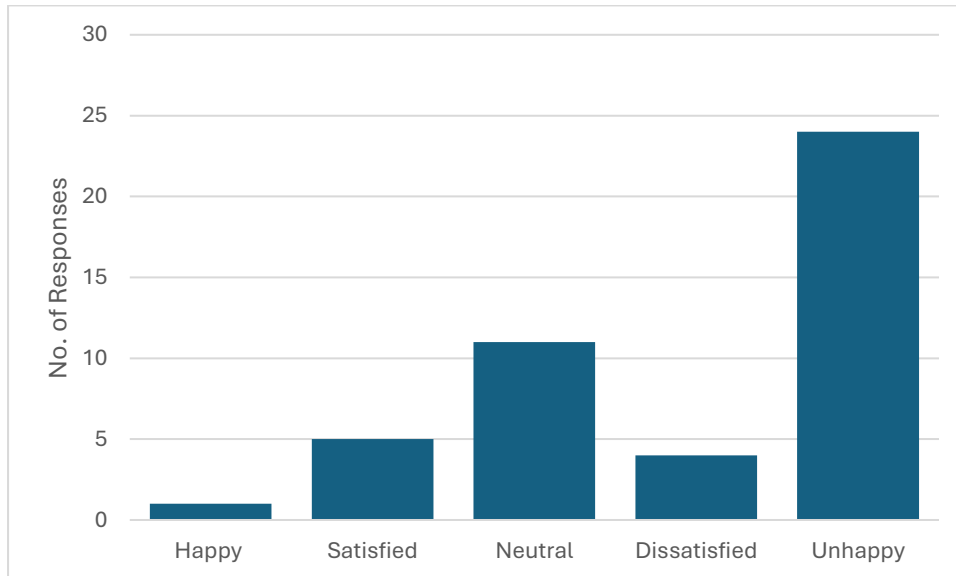
Some comments acknowledge the limitations of this site, in terms of its ability to expand.

Some general support for expansion, and praise for the existing surgery and its staff. Some concerns that with expansion some of the personalised care will be lost.

The Environment Agency responded in relation to the site posing a risk of contamination, (and a history of this on the site). It was suggested that to ensure that the planned development doesn't pose unacceptable risks to the water environment, a site-specific policy should be developed to enforce contamination investigation along with a remediation strategy and verification process.

Additionally, the Environment Agency has expressed that the geological condition of the area would result in significant challenges and limitations on alternative means of disposal for any foul sewage. greater depth. They have stated that a restriction may be placed on the uses of deep infiltration systems for surface water drainage.

Question: Site FMS4 Land south of Winchester Road, Four Marks - How do you feel about this site?



Question: Site FMS4 Land south of Winchester Road, Four Marks - What are your comments on this site?

Both support and objections were received for this site. A number of issues were raised as a concern over the site, namely: questioning the sustainability of the site; flooding and impacts to the River Itchen; lack of infrastructure; and access to the A31 being inappropriate due to safety concerns.

Support

Support was received for this site. The site was thought of as a good opportunity for the settlement to continue to expand. The development is far enough away from Ropley so merging of the two settlements would not occur, thus keeping their distinct identities. The site is thought to be ideally sited for continuing the existing diverse blend of properties that occurs in Four Marks. It is also thought advantageous that the site has the potential to provide direct access onto the A31 Winchester Road.

Comment was also made about how the site could assist Four Marks with receiving more needed infrastructure in the form of CIL receipts. It was noted that a large development such as this could generate a large amount of CIL and therefore help to provide infrastructure to the settlement too.

Some responses also understood that Four Marks will need to take some of the district's housing need and that this was considered the "least worst" option of proposed development in the settlement.

Access and transport

A mix of support and objection were received towards the access of the site adjoining the A31 Winchester Road. Some comments expressed support for an access onto the main highway through the settlement whereas others posed strong objections due to safety

concerns. The site access being so close to the brow of the hill, the end of the dual carriageway and point of speed limit change were key points of contention of the site access onto the A31 and its suitability with regard to safety. Comments were also received about how it can be difficult for vehicles to turn right onto the A31 throughout the settlement. Medstead and Four Marks Parish Council did state a preference for access to the site to be provided by the A31 as well as Pheasant Close.

The development is said to be a great distance from the settlements main amenities (over 20 minute walk), including the school, and some individuals even stated it to be “at the limits of sustainability.” Travel to amenities in Four Marks will be over an incline, thus thought to cause greater travel to occur by car for short distances, rather than walking or cycling. It is thus thought likely that the development will add to local highway congestion, especially at the school.

HCC expressed concerns over the distance of the site to the centre of Four Marks, Lymington Barns and the school. The highway authority also made reference to LTP4 with regard to a proposed access onto the A31 and how this will only be considered when all other reasonable alternatives have been explored and if the traffic flow on the principal road network is uncompromised. The County Council also stated that subject to regulatory tests being met a committed sum or developer commitment to upgrade the surface of Byway Open to All Traffic Four Marks 21, Four Marks Footpath 17b and Ropley Footpath 16 surrounding the development site, will be sought.

Medstead and Four Marks Parish Council’s response stated that a PROW improvement could be made to link Barn Lane and the recreation ground, as well as a cycle way to link the existing cycle route on the A31. The Parish Council stated that pedestrian improvements from the site to the school were also necessary, via Gradwell Lane.

Infrastructure

Many responses, including the Parish Council, highlighted the requirement for further infrastructure in Four Marks before any further development is constructed into the settlement, as further amenities are required for existing and new residents. Concern was raised about how the local GP surgeries would cope with new patients from the development, as they are claimed to already be overstretched. The ICB did respond to the consultation and specifically stated that from this site, developer contributions (e.g. S106 contributions) may be required towards the extension of Watercress Medical, Mansfield Park Surgery and/or of Boundaries Surgery.

It was expressed multiple times that the site should be accompanied by a new convenience store, (including the Parish Council), to serve the western side of Four Marks and due to the site being too far from existing facilities. A new convenience store should be located on the A31 to ensure it remains viable.

The employment opportunities in Four Marks were stated to be low. Consequently, the purpose of this new housing development was questioned, in that if associated employment cannot be provided locally for new residents.

Thames Water made a response stating that the scale of development is likely to require upgrades to the wastewater network. The Developer and Council are to liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan, which will determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development. Comments from the public were received about the neighbouring residential development to the site currently experiencing sewage capacity issues. The Environment Agency expressed concern that the geological condition of the area would result in significant challenges and limitations on alternative means of disposal for any foul sewage. The Environment Agency expressed that “there is a

significant probability that we would not be able to grant an Environmental permit for new non-mains discharges in this area, particularly if any system cannot meet British standard (BS:6297) method (such as boreholes or other deep infiltration soakaways). Natural England stated in their response that it would be concerning if the site could not be served by a wastewater treatment works and will therefore be served by a private, on-site Package Treatment Plant (PTP). There is uncertainty on where this will ultimately be discharging to, and therefore, based on the current evidence it is possible that Likely Significant Effects could occur on the River Itchen SAC.

Flooding

A number of responses were received with details about how parts of the site are susceptible to surface water flooding. Comments were also received about how the site would increase surface water run-off, particularly to adjacent properties on Barn Lane, Chaffinch Road, Pheasant Close and those along Winchester Road and could exacerbate existing flooding issues in the local vicinity. Mitigation methods to prevent surface water run-off to nearby water courses were thought essential if the development were to proceed to be allocated. Comment was also passed that if this existing agricultural land was to be built upon, it would mean the loss of natural methods of alleviating local surface water flooding by means of a natural soak away. The development industry made comment that the extent of surface water flood risk identified would mean that the site should be subject to the Sequential Test. The site is considered undeliverable until the Sequential Test has been undertaken for the site. The Environment Agency responded stating that they could restrict the uses of deep infiltration systems for surface water drainage, particularly within any area of additional sensitivity such as source protection zone 1. In addition the Environment Agency noted that the site has a history of land contamination and to ensure that any planned development on this site does not pose unacceptable risks to the water environment, a site-specific policy should ensure that a contamination investigation along with a remediation strategy and verification process is included.

Water quality

Many responses drew attention to the fact that a proportion of the site is in the nutrient sensitive catchment of the River Itchen and the top of the groundwater catchment. Concern was expressed that any further discharges to ground here will further impact the groundwater quality in the Itchen catchment.

Natural England currently disagrees with the conclusions that Likely Significant Effects of the Reg.18 Local Plan developments in Four Marks on the River Itchen SAC regarding water quality can be excluded. Natural England request that further assessment of this impact pathway through Appropriate Assessment will be required to demonstrate that any potential adverse impacts can be appropriately avoided or mitigated.

The site falls within the Solent catchment area and is subject to demonstrating robustly that they achieve nutrient neutrality. Use of Natural England's latest guidance on achieving nutrient neutrality for new housing development (January 2024) was recommended. With regards to eutrophication, phosphorus is currently a limiting factor within the River Itchen SAC and should be given due consideration. Individual responses on this site also questioned how nutrient neutrality will be achieved and methods to ensure no impacts to groundwater which will flow into the Itchen River. Suggestions were made that the boundary of the site is redrawn to exclude the related area to the River Itchen Catchment, thus also causing an associated reduction in the number of dwellings that the site could provide.

The Wildlife Trust also responded with concerns about the proximity of many of the site allocations to rivers including the potential impacts to the River Itchen Catchment from FMS4. The Wildlife Trust recommended that there are 20m natural buffers between watercourses and development to ensure protection for biodiversity and reduce the risk of

pollution reducing water quality. It pointed out that the Council has a responsibility to ensure that new development does not add further burden to the pressures faced by the district's water environment through policies which strengthen protection but also invest in water and sewage infrastructure.

Design

Many comments raised a point that if the development were to occur then the design should incorporate measures to be sympathetic and protect the existing neighbouring properties, such as Barn Lane.

Comments also wanted to point out how this development is at the edge of the settlement, its density should reflect this and show a natural "tailing off" of Four Marks. It was also expressed how the southern and western boundary of the site should be as low profile as possible and as "green" as possible via rural landscaping, to ensure as much of a natural connection is made to the surrounding countryside.

Medstead and Four Marks Parish Council reiterated CPRE's comment on this site, that the escarpment between Ropley and Four Marks was a 'valued landscape' and should be protected. At the top of this escarpment is Barn Lane Four and the proposed FMS4 development. If this development is approved, the NPSG seeks that appropriate policy is rigorously applied to the development.

Other

It was noted that previous planning applications on this site have been dismissed, with environmental issues being the main reason.

The development site does not align with policies proposed in the Local Plan.

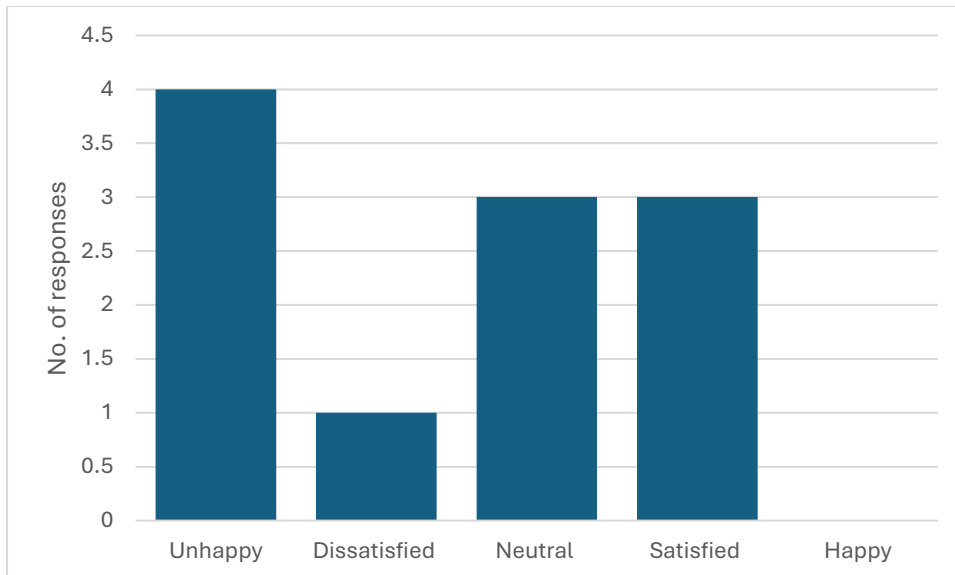
The site is prime agricultural land that's purpose is for growing crops. The site will destroy the countryside as development should be occurring on brownfield not greenfield land.

The site is at the edge of the ribbon development along the A31, but is outside of the existing settlement policy boundary and in the countryside.

Many homes are currently thought to be available on the market in both Four Marks and Alton, and the reason for this is assumed to be due to the unaffordability of properties in these settlements. It is argued that any further development in Four Marks will also be of equal unaffordability so there is no purpose in further development.

Alternative development sites were raised as more suitable to FMS4, with these being: site to the rear of 87 Lyminster Bottom Road that adjoins FMS2; LAA FM-041; and Land at Alton Lane.

Question: Site FMS5 Land at Fordlands, Brislands Lane, Four Marks - How do you feel about this site?



Question: Site FMS5 Land at Fordlands, Brislands Lane, Four Marks - What are your comments on this site?

An acceptance that it is challenging to find sites for Traveller accommodation, but many comments noting the amount of Traveller accommodation in Four Marks, and its distribution, with some lanes having more Traveller accommodation than bricks and mortar housing.

If allow sites to keep expanding, they will be cause problems with additional traffic. This is a rural area, and should be kept so.

This proposal is backland development that is contrary to the Neighbourhood Plan.

There are already out buildings on this site, and this would be over development of the site.

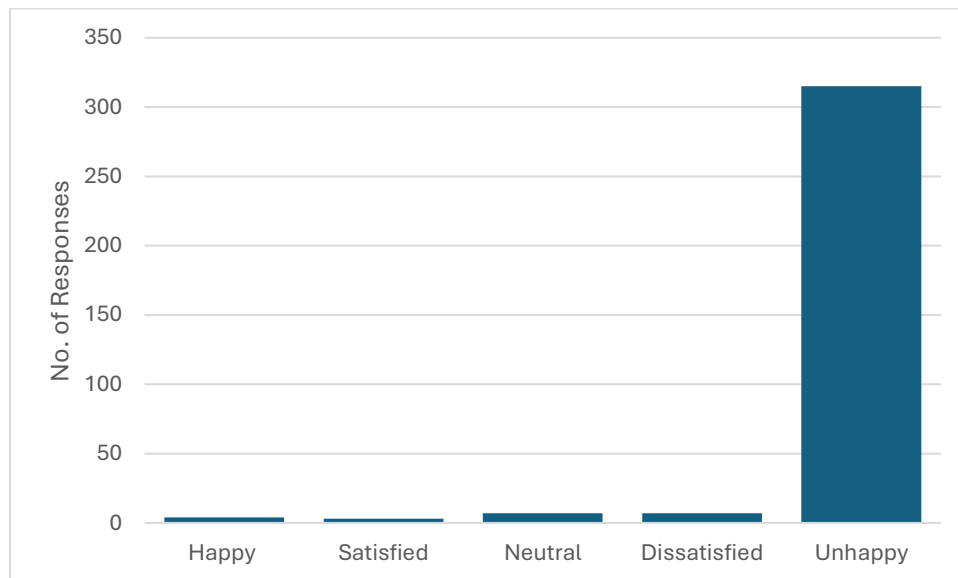
The proposal enables growth, on an existing site.

Representations received from Medstead & Four Marks Neighbourhood Plan Steering Plan which are supported by Four Marks Parish Council reference the accessibility score from the East Hampshire Living Locally Accessibility Study and Decide and Provide Methodology (Ridge Report 1). Comments are relatively neutral and consider that that the proposed site allocation is in in a discrete location on the edge of the settlement but is some distance from the existing services and facilities in Oak Green Parade. Comments also note that Four Marks has an existing gypsy and traveller community.

The Environment Agency have submitted representations in response to the proposed site allocation which highlights that the site/or the vicinity of has a history of historic land contamination. They noted that the geological condition of the area would result in significant challenges and limitations on alternative means of disposal for any foul sewage and have stated that there is a significant probability that an Environmental permit for new non-mains discharges in this area would not be granted.

To ensure that the planned development, located over principal/secondary aquifer A and doesn't pose unacceptable risks to the water environment, a site-specific policy has been suggested to ensure that a contamination investigation along with a remediation strategy and verification process is included.

Question: Site RLC1 Land at Deerleap (north) - How do you feel about this site?



Question: Site RLC1 Land at Deerleap (north) - What are your comments on this site?.

The main comments expressed were in regard to concerns on heritage assets. The site is part of the Rowlands Castle Conservation Area; adjacent a Scheduled Ancient Monument (Motte & Bailey Castle; and near Listed Buildings. Due to the historic significance of the site many commented that archaeological investigations would be needed.

There were many highways concerns raised, particularly around the access. It is narrow and prone to accidents, even resulting in a fatality. It was considered that there is limited public transport and limited parking already in Rowlands Castle (including the train station) and further development would exacerbate this. Concern that development will result in increased traffic on existing road network.

There were many concerns raised about the adverse impacts on ecology and biodiversity. The site has a diverse array of flora and fauna, including protected species such as the Great Crested Newt and Dormice.

There was a general concern that Rowlands Castle lacks sufficient infrastructure. Comments focussed on education, health care provision and sewage/waste disposal, citing the challenges currently faced with facilities running at capacity.

It was noted that the site floods regularly and further development is likely to exacerbate this. Most flooding related comments were around surface water flooding, but some people

considered the was in Flood Zone 2. There were concerns about local water supply as the site falls within an aquifer and ground water protection zone.

The unique character of Rowlands Castle relies on this site with its close proximity to the village green, a flint wall along the sites boundary and many trees (some subject to TPOs). It was considered these feature contribute to the Conservation are and development would adversely affect both landscape and character. Some people considered the site was next to an Area of Outstanding Natural Beauty and development would also impact on the gap with Havant.

Comments stated that the proposal is contrary to policies and objectives within the draft Local Plan, as well as the recent made Neighbourhood Plan. The site has also been rejected at previous appeals and was removed by the Inspector as a reserve site in the Local Plan: Second Review.

There were very limited comments of support for the site. Some commented on the need for affordable houses for families and older people, but it was noted the small capacity of this site would not deliver suitable housing types.

Rowlands Castle Parish Council raise similar concerns around heritage, landscape, biodiversity, flooding and water quality. Reference was made to any development being contrary to the Neighbourhood Plan, particularly the impact of on the flint wall, which is a 'non-designated heritage asset' in the NP. Additional concerns were raised about the adverse impacts to trees that are protected by virtue of the Conservation Area designation. The Parish Council also referenced the 'Examiner's report for Deerleap for EHDC Local Plan Second Review – 2006' which states: "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"

HCC as Highway Authority have Concerns about access to the site given limited visibility and limited provision of active travel infrastructure in the area to connect residents to the village centre

Historic England have noted that heritage impact assessments are needed for both sites RC1 and RC2.

The Environment Agency note the site falls within Flood Zone 2 and 3, as well as Source Protection Zones 2 and 3. Any applications would need to work closely with the EA and Portsmouth Water to ensure the risk are appropriately managed and controlled. They recommend a Site-Specific policy which sets out the requirement for a Flood Risk Assessment.

NHS note that developer contributions (e.g. by a s.106 contribution) will be required towards improvements at Rowlands Castle Surgery, to provide additional capacity.

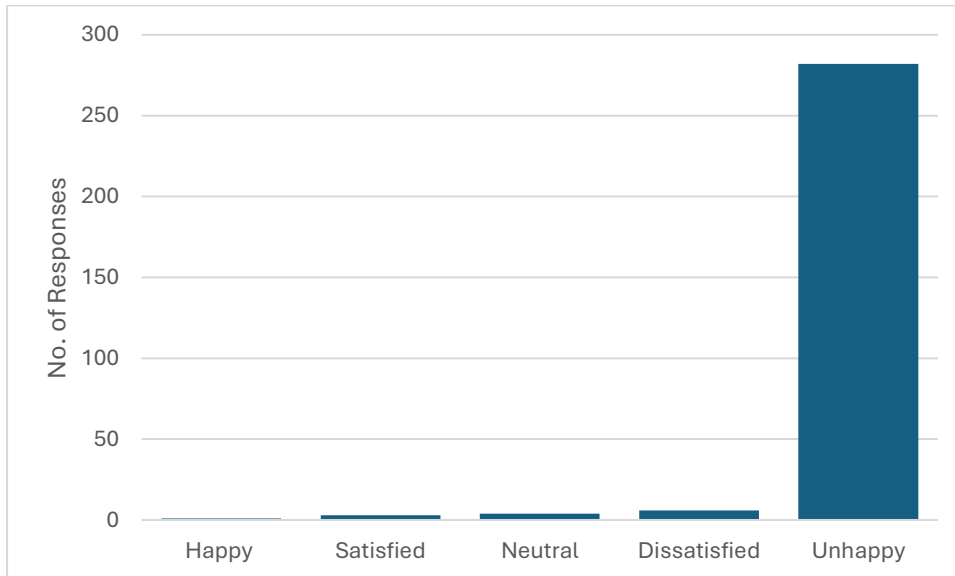
Natural England recognise that the Plan refers to Bechstein's Bats as a consideration for the allocations proposed in the Rowlands Castle area

Portsmouth Water notes all sites in Rowlands Castle fall within Source Protection Zone 1 and any development requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development

Chichester & District Archaeology Society note that an development of the site will require a full archaeological survey once the ground is cleared.

Site promoter advocates development due to the close proximity to the railway station and other local amenities, which could address any concerns through a careful layout for a modest scheme of 5 dwellings.

Question: Site RCL2 Land at Deerleap (south) - How do you feel about this site?



Question: Site RCL2 Land at Deerleap (south) - What are your comments on this site?

The main comments expressed were in regard to concerns on heritage assets. The site is part of the Rowlands Castle Conservation Area; includes a Scheduled Ancient Monument (Motte & Bailey Castle; and near Listed Buildings. Due to the historic significance of the site many commented that archaeological investigations would be needed.

There were many highways concerns raised, particularly around the access. It is narrow and prone to accidents, even resulting in a fatality. It was considered that there is limited public transport and limited parking already in Rowlands Castle (including the train station) and further development would exacerbate this. Concern that development will result in increased traffic on existing road network. The lane is also a bridle path and part of Shipwrights Way, which be inappropriate for further cars.

There were many concerns raised about he adverse impacts on ecology and biodiversity. The site has a diverse array of flora and faun, including protected species such as the Great Crested New and Dormice.

There was a general concern that Rowlands Castle lacks sufficient infrastructure. Comments focussed on education, health care provision and sewage/waste disposal, citing the challenges currently faced with facilities running at capacity.

It was noted that the site floods regularly and further development is likely to exacerbate this. Most flooding related comments were around surface water flooding, but some people considered the was in Flood Zone 2. There were concerns about local water supply as the site falls within an aquifer and ground water protection zone. The field becomes very 'marsh-like' outside of summer months.

The unique character of Rowlands Castle relies on this site with its close proximity to the village green, a flint wall along the sites boundary and many trees (some subject to TPOs). It was considered these feature contribute to the Conservation are and development would

adversely affect both landscape and character. Some people considered the site was next to an Area of Outstanding Natural Beauty and development would also impact on the gap with Havant.

Comments stated that the proposal is contrary to policies and objectives within the draft Local Plan, as well as the recent made Neighbourhood Plan. The site has also been rejected at previous appeals and was removed by the Inspector as a reserve site in the Local Plan: Second Review.

Some commented noted the small capacity of this site would not deliver suitable housing types.

Rowlands Castle Parish Council raise similar concerns around heritage, landscape, biodiversity, flooding and water quality. Additional concerns were raised about the adverse impacts to trees that are protected by virtue of the Conservation Area designation and it was questioned whether the site could be accessed, with commentary on visibility splays and the unadopted status of the road. The Parish Council also referenced the 'Examiner's report for Deerleap for EHDC Local Plan Second Review – 2006' which deleted the sites inclusion as a potential reserve site.

HCC as Highway Authority have Concerns about access to the site given limited visibility and limited provision of active travel infrastructure in the area to connect residents to the village centre

Historic England have noted that heritage impact assessments are needed for both sites RC1 and RC2.

The Environment Agency note the site falls within Source Protection Zones 1, 2 and 3. Any applications would need to work closely with the EA and Portsmouth Water to ensure the risk are appropriately managed and controlled.

NHS note that developer contributions (e.g. by a s.106 contribution) will be required towards improvements at Rowlands Castle Surgery, to provide additional capacity.

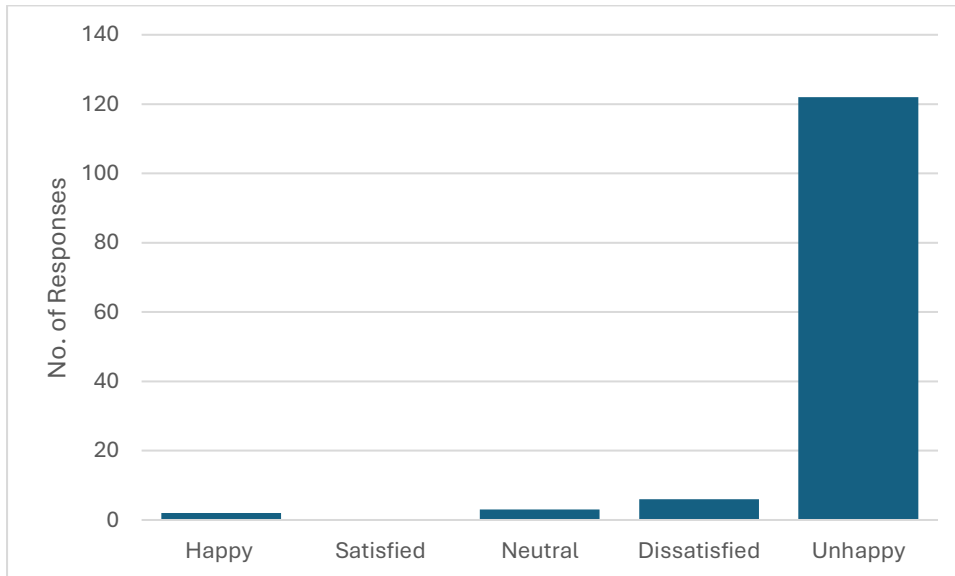
Natural England recognise that the Plan refers to Bechstein's Bats as a consideration for the allocations proposed in the Rowlands Castle area

Portsmouth Water notes all sites in Rowlands Castle fall within Source Protection Zone 1 and any development requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development

Chichester & District Archaeology Society note that an development of the site will require a full archaeological survey once the ground is cleared.

Whilst RLC2 is slightly further from the main village centre and railway station, the site promoter notes it lies next to RLC1 to its north and therefore is very similar in terms of its sustainability and relationship with the existing settlement. They consider surface water can be addressed and the majority of the site is suitable for 8 dwellings.

Question: Site RLC3 Land at Oaklands House - How do you feel about this site?



Question: Site RLC3 Land at Oaklands House - What are your comments on this site?

The main comments received were in regard to the adverse impacts development would have on the highway network due to the need for a car and there is already limited car parking within Rowlands Castle. The access from Whichers Gate is narrow and it is considered further development would further exacerbate issues in that location, especially due to the close proximity of the school.

There was a general concern that Rowlands Castle lacks sufficient infrastructure and has received a large amount of growth over the last six years. Comments focussed on education, health care provision and sewage/waste disposal, citing the challenges currently faced with facilities running at capacity.

Although there is no know heritage assets on the site there were concerns that Roman archaeological remain could be likely given the importance of Rowlands Castle as a pottery production area and development could have an adverse impact on the nearby ancient byway.

There were many concerns raised about the adverse impacts on ecology and biodiversity. The site has a diverse array of flora and fauna, including deer and is designated as a SINC. There are also concerns that development would impact on the ancient woodland adjacent, which is subject to a TPO and a designated SSSI.

It was noted that drainage in the area is poor, and flooding would increase with development.

This site is considered as necessary open, green space for the new development adjacent. Development would erode the gap between Rowlands Castle and Havant. Development would change the character of the village, having an adverse impact on landscape and visual impacts.

Amenity concerns were also raised, with potential overlooking of existing properties, which could have a negative impact on the valuation of such properties. More general concerns are also raised on the adverse effects to local residents during construction, including excessive noise and potential damage caused by construction related traffic. Comments stated that the proposal is contrary to policies and objectives within the draft Local Plan, as well as the recent made Neighbourhood Plan.

Whilst there was limited support for developing the site, which noted its sustainable location, it was acknowledged that affordable homes were needed in the village.

Rowlands Castle Parish Council raised limited concerns regarding the site, but stated that there must be no development on the 'Oaklands Meadow' SINC. All other commentary was in regard to what future development proposals should include, such as open space around the protected oak tree, similar densities to adjacent housing, as well as potential infrastructure requirements.

HCC as Highway Authority note deliverability is dependent on provision of infrastructure coming forward from the adjoining site and connectivity for all modes into it. In isolation this site would be considered unsustainable. The provision of access through Woodlands Avenue rather than the Whichers Gate Road is supported.

The Environment Agency note the site falls within Source Protection Zones 1c and 4. Any applications would need to work closely with the EA and Portsmouth Water to ensure the risk are appropriately managed and controlled.

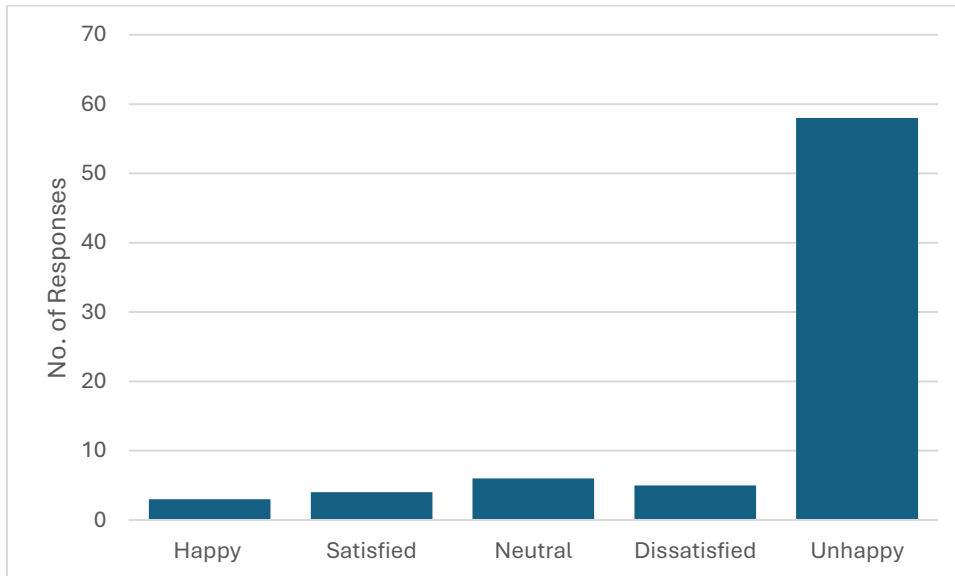
NHS note that developer contributions (e.g. by a s.106 contribution) will be required towards improvements at Rowlands Castle Surgery, to provide additional capacity.

Natural England recognise that the Plan refers to Bechstein's Bats as a consideration for the allocations proposed in the Rowlands Castle area

Portsmouth Water notes all sites in Rowlands Castle fall within Source Protection Zone 1 and any development requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development

The site promoter supports the allocation, confirming its suitability, availability and deliverability. It is also confirmed that nitrate credits have been secured to offset the proposed development and further land identified for BNG purposes.

Question: Site RLC4 Land at Little Leigh Farm - How do you feel about this site?



Question: Site RLC4 Land at Little Leigh Farm - What are your comments on this site?

The majority of comments were associated with the wider implications on Rowlands Castle as a village, rather than site specific issues. There was a general concern that Rowlands Castle lacks sufficient infrastructure and has received a large amount of growth over the last six years. Comments focussed on education, health care provision and sewage/waste disposal, citing the challenges currently faced with facilities running at capacity.

Concerns raised that the site does not benefit Rowlands Castle village due to its relationship with Havant and this distance would not allow sustainable travel modes to the village. As a result it was considered by some that development in this location would not maintain the vitality and viability of the village centre.

A frequent comment related to the adverse impact on the strategic gap between Rowlands Castle and Havant, with boundaries between settlements disappearing and contradicting local plan policies on coalescence.

Some acknowledged there may be archaeological potential on the land and other commented on the poor drainage, which could lead to further flooding. Adverse impacts on flora and fauna was noted.

Nearby residents had concerns that homes would be devalued, views ruined and lead to unwanted access to their properties. It was also noted that building works would have a detrimental impact on properties.

There was more support raised for the site when compared to other proposed allocations in Rowlands Castle Parish, with some noting it was less damaging than other proposals. It was acknowledged that a larger site provides more infrastructure as well as affordable housing. It was noted that bus services in nearby Havant Borough are more frequent than Rowlands Castle.

Rowlands Castle Parish Council raised limited concerns to the site, but referred to comments on previous iterations of the Local plan in terms of suggestions around what future development should consist of, which additional commentary on necessary infrastructure requirements.

HCC as Highway Authority has concerns regarding the access to the site being proposed from Prospect Lane. This road is currently single carriageway, with no footway or cycle provision and hedgerows on either side. Any proposals for this site would need to demonstrate how these issues could be overcome, as well as how pedestrian and cycle links can be provided through the site to the existing adjoining residential areas and PROWs.

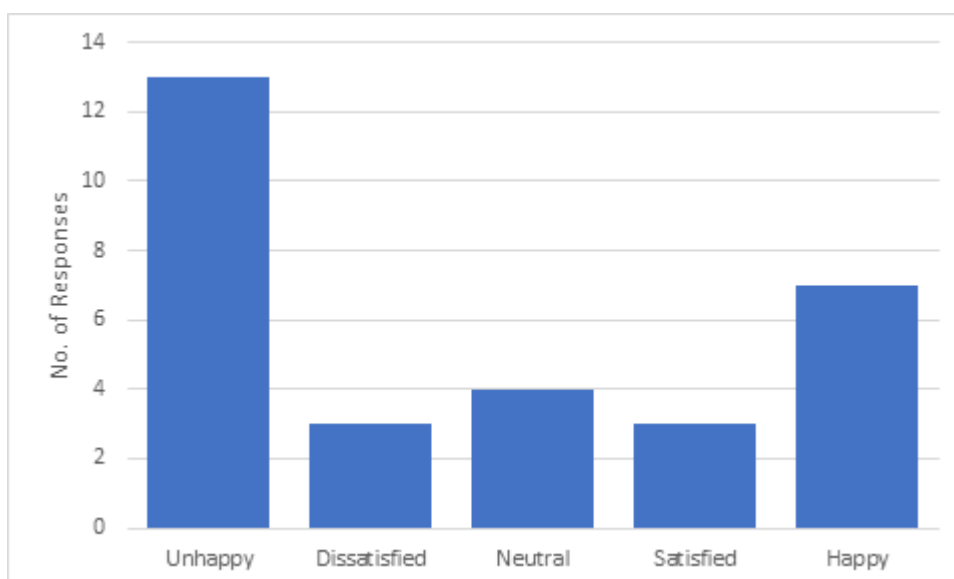
HCC has also requested additional wording to the policy as the site has been identified as having minerals as a constraint. HCC may also seek off-site contributions to the nearby Staunton Country Park and for the public maintenance of the wider Public Right of Way network.

NHS note that developer contributions (e.g. by a s.106 contribution) will be required towards improvements at Rowlands Castle Surgery, to provide additional capacity. However, developer contributions may instead be required towards health infrastructure within the Havant Borough Council area, if identified through on-going 'duty to co-operate' discussions.

Natural England recognise that the Plan refers to Bechstein's Bats as a consideration for the allocations proposed in the Rowlands Castle area.

Portsmouth Water notes all sites in Rowlands Castle fall within Source Protection Zone 1 and any development requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development.

Question: Site BEN1 Land west of Hole Lane, Bentley - How do you feel about this site?



Question: Site BEN1 Land west of Hole Lane, Bentley - What are your comments on this site?

Some supportive comments received, mostly saying that some new homes will help support the village, support local school and businesses. Bentley has a railway station, which should be a priority for locating housing when trying to reduce reliance on the car. Comments saying this is a logical extension to Bentley, and that Bentley is well connected to the A31, bus route to Alton and Farnham and Guilford and main line railway station by footpath, and that it could accommodate a modest amount of new homes without considerable impact on the village.

Also some queries suggesting that as it is a Tier 3 settlement, it should be allocated more homes in the Local Plan, and that the current proposal is too modest and more could be accommodated. There is deliverable land close to A31 and railway station that scores better in the accessibility study than many sites in the area.

However some comments state that Bentley shouldn't be a Tier 3 settlement as it is significantly smaller than others in the group and more aligned to Tier 4.

Also query whether the developer would actually stop at 20 proposed, given the site is 2.5 hectares and the adjacent development was for 37 homes on 1.93 hectares.

Many comments focus on infrastructure provision. Bentley has a Primary School with limited capacity. Secondary education requirements may put pressure on Weydon School in Farnham. The need for financial contributions towards education must be included as close to the boundary with Waverley/Farnham Parish boundary. A Section 106 Agreement with Surrey County Council for school funding would be appropriate.

Bentley has no health provision following the closure of the GP Practice. There is potential for demand on health provision in Farnham. Financial contributions may be needed for GP practices and Farnham Hospital.

Concern that there is no proposed provision for extra schooling and more traffic. There are too many people and not enough infrastructure.

Developments need to take into account the suitability of the road network to the North of Bentley. Hole Lane has become a busy road with the sunken Lane being badly affected with vehicles trying to pass one another eroding the sides of the historic landscape.

Concerns about access; due to the road layout and widths significant adjustments would need to be made to the Somerset fields access road; potential access through existing development causes health and safety impacts and reduction in existing green space that is regularly used.

The entrance at the allotment side is not owned by the field land owner. The developer has sold a parcel of land to a resident.

Concerns about the impact of development on the character of the area and the environment. Loss of beautiful greenfield land and will increase environmental harm. The proposal is not in keeping with the village feel.

The area is waterlogged. Need to bear in mind there is an attenuation tank under the current green.

The development will impact local amenity - the development on Somerset fields was sunk into the field to minimise impact, which means the private track for the vineyard suggested for cycle and footpath at the top of development which has little use is sat above the rear of

a number of properties and would allow visibility into people's homes and gardens impacting privacy.

This proposed development does not align with the policies within the East Hampshire Local Plan. The site isn't suitable as it has been rejected before.

Other alternatives should be considered. Bentley is a disjointed village; homes should be built on the land between Station Rd/River Road and the old main road - right in the heart of the village. Also there is a 3 acre paddock off of Rectory Lane - access could be made via the existing Bentley Industrial Centre which has great road access. The GP surgery has just gone through development Planning and there are other infill sites that are more suitable.

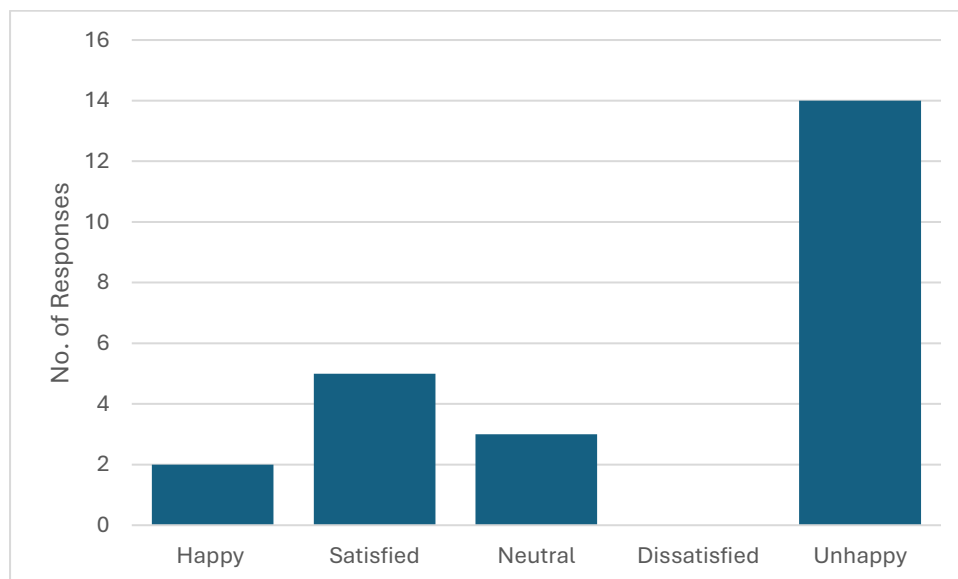
The central government wanted focus to shift from green space to brownfield sites, yet this is a greenfield site being proposed.

No more housing is needed. Alton and surrounding towns are already built up enough as it is.

The HCC Local Highway Authority supports vehicular access through the development to the east but notes it that Somerset Fields is not adopted public highway. It is suggested that the developer should be required to provide pedestrian and cycle infrastructure improvements on Hole Lane and on connecting routes into Bentley Village Centre

The Defence Infrastructure Organisation have responded in relation to the RAF Odiham Height and birdstrike safeguarding zones. Development exceeding 91.4m high will trigger consultation requirement and any development that creates an attractive environment for flocking bird species is to be formed temporarily.

Question: Site BWH1 "Top Field", land adjacent to Glebe Field - How do you feel about this site?



Question: Site BWH1 “Top Field”, land adjacent to Glebe Field - What are your comments on this site?

The main comments highlight that Bentworth is a Tier 5 settlement in the settlement hierarchy and the reason for it being in a low tier is due to it having very limited public transport services, (bus service on only two days of the week), no healthcare facilities, no local shop and not being connected to mains gas or sewage. It is also expressed how unsuitable it is thought for a Tier 5 settlement to host future planned development and that siting development in the rural village of Bentworth is contrary to the plan’s policies and objectives on transport/accessibility and climate change, as well as the Vision and Objectives of the draft Local Plan, which seeks to allocate growth in the upper tiers (1-3) of the settlement hierarchy.

It was stated that the site was not thought to be in a sustainable location of the district.

Comments also highlighted that the lack of facilities in Bentworth generally correlates with a location preferred by the elderly community, rather than attracting young families. It is not thought that young people / families will be attracted to living in the new development unless new facilities are also provided. Due to the site being opposite the local school, it was suggested that the new homes are small to attract young families that will utilise the school.

Hampshire County Council expressed that the opportunities to provide quality walking and cycling infrastructure from the site to local facilities may be limited. Station Road provides scope for improvements in places, but this is not the case along its entire length and therefore provision of a safe and continuous active travel route may be difficult. The site is abutted by a PROW to the south and consideration should be given to provision of pedestrian links from the site to this footpath. Subject to the necessary regulatory tests being met, the County Council will seek off-site contributions, or developers’ commitment, for surface and access improvements to Footpath Bentworth 7 adjacent to southern boundary of site, leading to the school.

A comment suggested that the new homes should come with covenants to prevent future extensions being made to the properties, thus maintaining some smaller houses small in an otherwise expensive village dominated by large properties.

Comments expressed concern that the development of this site will cause the loss of Grade 3 agricultural land. It was felt more important to continue to utilise the land for farmland (crop and livestock) purposes, due to the recent increase in cost of purchasing food. Support was given for use of brownfield land instead of such a greenfield site.

Objections raised to the development due to it not being compliant with the requirement to respect the setting, form and character of the settlement. It was stated that “Top Field” lying to the south of Glebe Field contributes to the setting of the wider conservation area, with Top Field forming part of a patchwork of fields surrounding the Grade II* Church. The draft Local Plan was criticised for failing to acknowledge this special quality of the village or the contribution the field currently makes to its setting or sense of arrival.

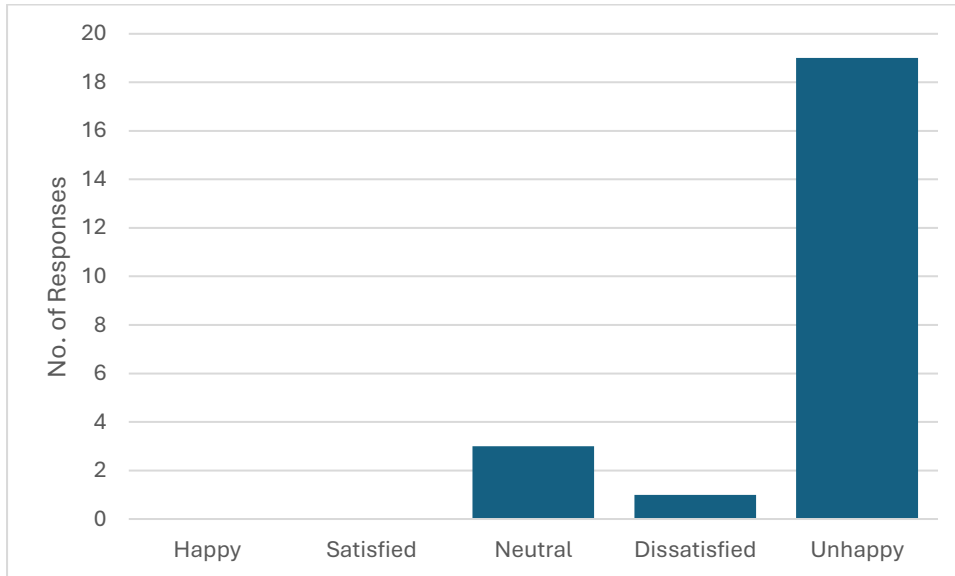
Historic England has suggested that a proportionate heritage impact assessment is undertaken for this site allocation.

Since December 2023, the site promoter has been engaged with a planning application (ref. 60094) for the allocation’s development with 6 dwellings. The developer states that Biodiversity Net Gain can be provided on the site. But the community shared its objection to the proposal by re-iterating that at the recent application, approximately 65 objections were received.

The Defence Infrastructure Organisation have responded in relation to the RAF Odiham Height and birdstrike safeguarding zones. Development exceeding 45.7m high will trigger consultation requirement and any development that creates an attractive environment for flocking bird species is to be formed temporarily.

There were very limited comments of support for the site.

Question: Site BWH2 Land at the corner of Church Street - How do you feel about this site?



Question: Site BWH2 Land at the corner of Church Street - What are your comments on this site?

The main comments highlight that Bentworth is a Tier 5 settlement in the settlement hierarchy and the reason for it being in a low tier is due to it having very limited public transport services, (bus service on only two days of the week), no healthcare facilities, no local shop and not being connected to mains gas or sewage. It is also expressed how unsuitable it is thought for a Tier 5 settlement to host future planned development and that siting development in the rural village of Bentworth is contrary to the plan's policies and objectives on transport/accessibility and climate change, as well as the Vision and Objectives of the draft Local Plan, which seeks to allocate growth in the upper tiers (1-3) of the settlement hierarchy.

It was stated that the site was not thought to be in a sustainable location of the district. Houses should be built where existing infrastructure exists. It was also commented on how the site scores poorly within the East Hampshire Accessibility Study.

Comment was made that this site is preferential to the other draft Local Plan site allocation in Bentworth, "Top Field" / Glebe Place.

Comments also highlighted that the lack of facilities in Bentworth generally correlates with a location preferred by the elderly community, rather than attracting young families. It is not thought that young people / families will be attracted to living in the new development unless

new facilities are also provided. Instead it was stated that the new development is likely to attract wealthy retirees who are dependent on using a car.

Many comments were received in relation to the village school. It was expressed that the school was currently at capacity, so there would not be space for any new families children to attend. Church Street is used for school parking and already reaches capacity at drop-off/pick-up times. Cars create a one-way system, which can be dangerous for children walking to school. It was stressed that more housing in Bentworth would exacerbate these parking and safety risks in proximity to the school, by additional traffic travelling through the village.

Multiple comments also highlighted other current traffic related issues in the village, specifically due to the narrow roads already being strained with large farm vehicles. Additional traffic from new residents of the development site would cause this problem to worsen.

Hampshire County Council expressed that the opportunities for travel to be made from the site by sustainable modes will be limited and instead highly car dominant. It is expected that the site access will have limited visibility due to heavy vegetation on the narrow carriageway. It was also stated by HCC that there is currently no footway provision and due to the width and rural nature of the road, footway provision would need to be provided to connect to the existing public rights of way (PROW) network. It was also stated that subject to the necessary regulatory tests being met, the County Council will seek an obligation to maintain the alignment of Footpath Bentworth 4 through the site. Applicants would need to demonstrate proposals to improve accessibility for PROW around the village school.

Comments expressed concern that the development of this site will cause the loss of Grade 3 agricultural land. It was felt more important to continue to utilise the land for farmland (crop and livestock) purposes, due to the recent increase in cost of purchasing food. It was also commented on how the farmland was central to the villages charm and character, and additional development would disrupt this. It was also stated that new development would be detrimental to the conservation area. Comment was also made about how wet the land is and that there has been a lot of localised flooding in the village this winter. Reducing the agricultural land that water is able to drain off / through will compound this as well as flood risks increasing due to greater built up nature of the area.

Historic England has suggested that a proportionate heritage impact assessment is undertaken for this site allocation.

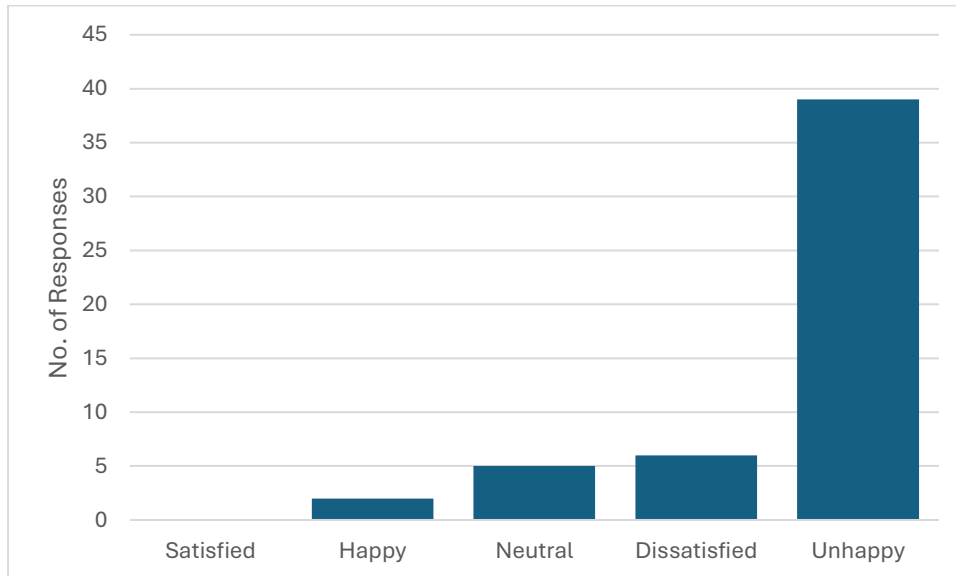
Comment was made that the proposed development will negatively impact on the dark skies. Currently there are no street lights in Bentworth but it is presumed the new development will have these, thus impacting on the night sky and feel of the village significantly, as it will no longer be a small village.

The proposed site could negatively impact wildlife habitats and protected species. It is presumed that it will not be possible for biodiversity net gain or ecological enhancements to be provided on site, due to its constrained make-up and size.

The Defence Infrastructure Organisation have responded in relation to the RAF Odiham Height and birdstrike safeguarding zones. Development exceeding 91.4m high will trigger consultation requirement and any development that creates an attractive environment for flocking bird species is to be formed temporarily.

There were limited comments of support for the site.

Question: Site MSD1 Land rear of Junipers, Medstead - How do you feel about this site?



Question: Site MSD1 Land rear of Junipers, Medstead - What are your comments on this site?

Supportive comments note the benefit of new residents for the vibrancy of the village, sustain its existence and keep local primary open. Small addition adjoining the village, so keeps village contained. Such a small development can easily be incorporated into Medstead and would be sustainable. Query about the type of homes proposed, with some support if starter homes.

However, many comments raising concerns, primarily relating to infrastructure, access and traffic.

There is insufficient infrastructure to support this development, including schools and doctors. Children are already taxied to secondary schools.

Concern about increase in parking and traffic, and narrow roads leading to the site. No public transport available (nearest available in Four Marks). There will be more traffic along South Town Road, which already has several narrow bends where it's dangerous to meet oncoming traffic.

The entrance to Green Stile seems wide at first, but actually there are cars parked dangerously on the junction/on the pavement which narrows the entrance significantly, then the road into Green Stile becomes very narrow. This raises safety concerns. The route through Green Stiles is narrow with many parked cars. The junction of Greenstile with the High Street has narrow roads and poor visibility exacerbated by recent building and the increased number of parked cars.

Concern that this part of the village doesn't have access to mains sewerage, or in part, mains gas. This would either necessitate extensive redevelopment of these systems or the incorporation of individual sewage management systems for each building - as is the case on South Town Road. This could present a serious problem given the increasing incidents of localised flooding. Or the site would have to have its own drainage system as the one in

Greenstile is up to capacity. Developers contribution needed to resolve drainage issues on this junction. Also concern about water pressure.

The footpath running along the full length of the South Boundary extends beyond the proposed site towards South Down Road, passing alongside the Medstead cemetery where it meets the road at the pinnacle of a corner. This is a very dangerous location for that footpath exit, particularly as the footpath road location faces towards the open spaces and football field on the other side of the road. There needs to be a road re-design to incorporate a single lane on the other side of the road from the footpath, to ensure the ability of pedestrians to be able to step beyond the present footpath roadside ending so that they see road traffic from both directions when they cross the road.

With regards to the sustainability of the location, there are few opportunities for employment, as such people will need to travel; no nearby train station, bus stop or main road. The nearest cycle path that connects to Alton starts 1.4 miles from the proposed development site. There is no such potential to connect the site to the public rights of way network. Whilst access to the centre of Medstead and its small number of services can be achieved by walking and cycling, the roads immediately beyond the centre of Medstead are dangerous for walkers and cyclists. It is not feasible, for example to walk or cycle safely to the nearest health services which are to the south of the village near the A31. Whilst there is a right of way network it is only suitable for recreational use as much of it is extremely muddy for a large part of the year and many won't use it in winter for that reason.

The development crosses over a footpath which is the main safe route to the village centre, especially for those coming from the south west of the village. Mitigation for safe pedestrian routes needed. If possible take the footpath from the North of Homestead Road, running behind the cemetery and over to Greenstiles and make this a usable path for pedestrians and cyclists.

Concerns about flood risk, with surface water flooding in the area, which has got worse. The entrance to Green Stiles can be submerged with water. Large volumes of water pool exactly here when it rains- creating a large lake area. This is evidence of the very poor drainage which will only be worsened.

The site is a haven for wildlife which will be lost. There are mature trees and bushes. The fields and paddocks around the village are generally not the subject of intensive farming, providing carbon sinks and assisting with mitigating the affects of climate change. The water system from Medstead also drains into the River Itchen, as such the increased waste water would have associated knock-on environmental concerns. The views of an independent and suitably qualified and experienced ecologist to carry out a publicly-available biodiversity baseline assessment will be required to fulfil the new legal requirement placed on developers to deliver a minimum 10% biodiversity net gain.

The proposal would have an adverse impact on amenity. The current outlook for houses on South Town Road and Green Stile would be materially altered.

Concerns about increase light pollution and adverse impact on dark night skies.

Medstead is a Tier 4 settlement however it's been allocated more homes than other villages in Tier 4. Medstead has been placed in a higher settlement hierarchy tier following the results of a recent Accessibility Study using the LSAAT tool. In the case of Medstead the LSAAT tool seems to discount on the ground realities.

This is the start of more infill development in Medstead.

Excessive sprawl of development contributing to unsustainable development of Medstead and Four Marks, turning villages into connurbated town sized housing estate.

The development would be out of character with the village, at odds with the 'ribbon type' character of the surrounding village. The village's character is defined by its linear nature without substantial development in any one area. The addition of this site to the Green Stile development, would materially alter this character. The scale is disproportionate to the character of the village, which has been a rural settlement for thousands of years.

Loss of agricultural land.

This proposed development does not align with the policies included with the EHDC local Plan including 'Delivering Green Connections'.

Medstead Parish Council comments welcome the allocation MSD1 Land rear of Junipers, which will provide a good fit in its position in the village and help to ensure our future viability of our village. Within the village it is a sustainable location, but it is noticeable that for most employment or retail needs, a private vehicle is needed to access the closest locations.

However, the Council will support this site, as it will sustain the life of the village, but the Council expects the dwellings in the development:

- to be truly affordable
- must include greater than 40% social housing, and
- support the local need for 1, 2 and 3 bedroom dwellings.
- each dwelling should have an insulation level achieving 15kWhr/m²/yr as a minimum, and
- each dwelling to have on site generation (PV) using all available roof space

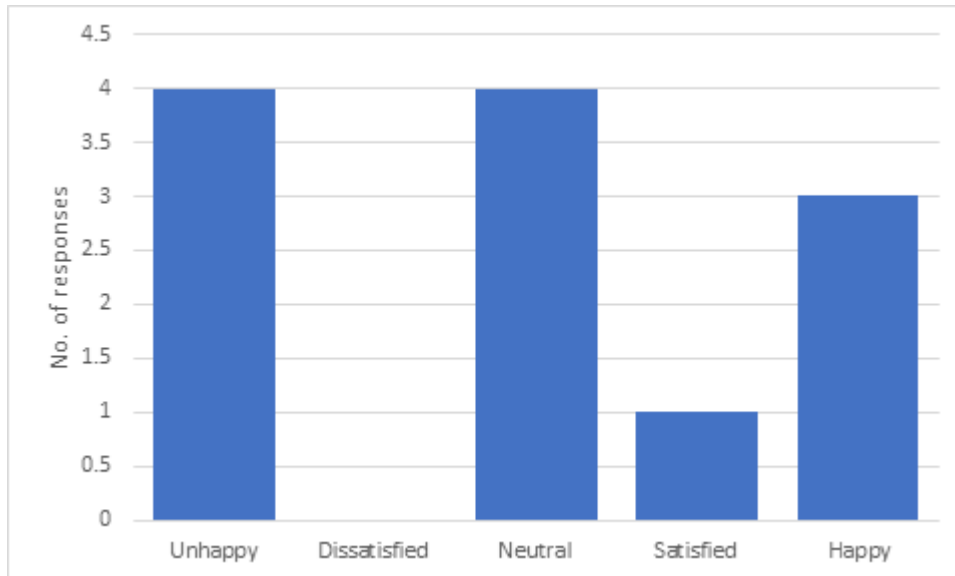
HCC Highway Authority suggest that there are opportunities for improving walking and cycling routes to the site and linking to the existing PROW network. Although the site is in walking and cycling distance of facilities in Medstead village centre, residents of the development are likely to be reliant on car use for access to employment and secondary education due to the rural nature of the surrounding area.

It is likely that HCC will seek off-site contributions for surface improvements and enhancements to the PROW network.

The Defence Infrastructure Organisation have responded in relation to the RAF Odiham height and birdstrike safeguarding zones. Development exceeding 45.7m high will trigger consultation requirement.

The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) has suggested that developer contributions may be required towards the extension of Watercress Medical, Mansfield Park Surgery and/or Boundaries Surgery.

Question: Site HED1 Land at Middle Common - How do you feel about this site?



Question: Site HED1 Land at Middle Common - What are your comments on this site?

There is some supportive comments and some comments raising concerns about this proposed site allocation.

Supportive comments note it is an established site providing a stable base, and better to extend, supportive of the play area and footpath, and the newer plots there are better designed and well kept.

Concerns are raised about a change in character particularly around the woodland, and light pollution. Also, that the site is too big, and not suitable for the proposed development.

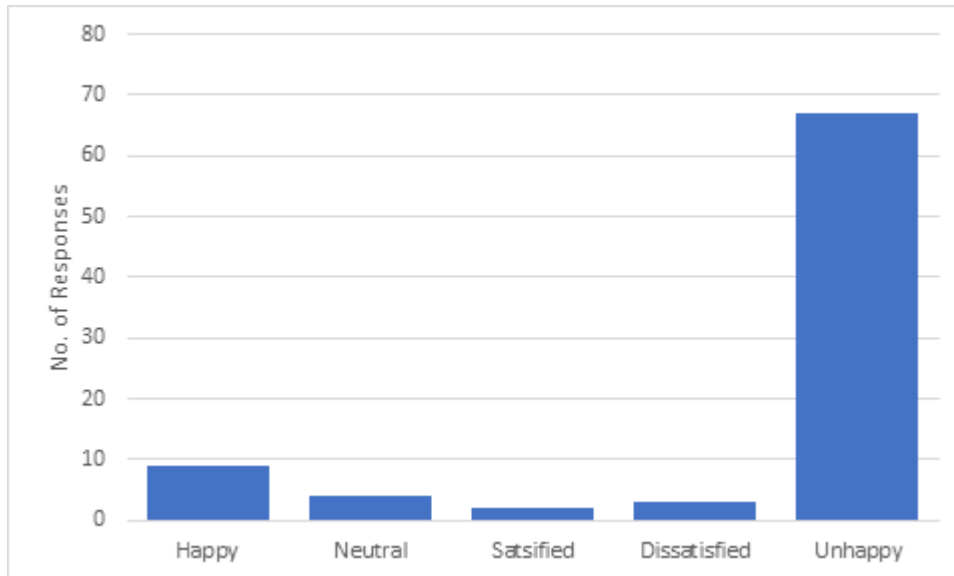
The Environment Agency note that environment constraints include a principal aquifer.

Natural England has raised concern that the proposed site allocation includes land within 400m of the of Wealden Heaths SPA/SAC sites where residential development should not be permitted. They state that further information should be provided to show whether this site could be deliverable without contravening proposed Policy NBE4. As currently submitted, this site does not appear to be an appropriate allocation.

Comments from the RSPB suggest the potential impacts on the Wealden Heaths Phase II SPA could be avoided by avoiding development within the 400m buffer zone. Further clarification is required on the wording of some of the text.

Headley Parish Council agree that the proposed site allocation is an appropriate location for 6 travelling show peoples. However, given that the southern part of the site is located within 400m of the Ludshott Common SPA, it is suggested that the pitches will have to be located at the northern end of the site, subject to the preparation of a HRA, appropriate screening is planted on the northern boundary adjoining the footpath and no maintenance/amenity buildings are constructed without planning permission.

Question: Site HOP1 Land north of Fullers Road, Holt Pound - How do you feel about this site?



Question: Site HOP1 Land north of Fullers Road, Holt Pound - What are your comments on this site?

A small amount of support was submitted for this proposed development site. The reasons given being that it is a good location for a small number of homes, it is well served by services in both Waverley and East Hampshire and it is close to Rowledge and benefits from access to the school, shop, pub and village hall. The site also benefits from a local bus route along Fullers Road.

The site is untidy and suffers from surface water flooding, the proposed development would address these problems provide vital housing where there is an acute need for new, sustainable housing. The proposed development would be a good addition to Holt Pound and Rowledge.

The current use doesn't benefit the local community, is untidy and experiences surface water flooding. Development would address these problems.

There should be more housing in the local area, there is a great need for more housing particularly affordable housing. Note, despite the supportive element of some comments, some comments were caveated with only wanting to see 19 homes delivered on the site, and not 50.

Objection is raised to the Holt Pound being identified as a Tier 4 Settlement. This is considered inappropriate as the number of facilities is small and narrow in function. The methodology used to re-tier the settlements is misleading and flawed.

Many comments were received raising objections to this proposed development site. General objections said that there's already been sufficient development in the area, and permission was refused before so question what has changed – quoting an earlier assessment of that site that stated 'residential development would have an adverse impact on the rural character of the area'. Also querying the number of homes proposed as a lot of responses understand the developer to be proposing 50 homes. Many comments saying

that although the number of homes is relatively small in comparison to other sites in the Draft Local Plan, the actual impact in the local area is large, and the actual gain in terms of 19 homes is modest and actually not needed as the plan allocates more than needed – in essence harm is greater than the benefit of a small number of homes. This will also set a precedent for infill development in the area.

Many comments raising concerns about the erosion of countryside land, with a significant loss of green space. The green space is important for retaining the semi-rural character of the area. There is also concern about coalescence with other nearby settlements or Rowledge and Wrecclesham.

There is concern about Holt Pound being identified in the settlement hierarchy as tier 3. Holt Pound is not a tier 3 hamlet when compared to other tier 3 villages; this should be changed. It is a small hamlet with just over 100 homes (population of 350); it is too small. The other tier 3 settlements have more facilities. It shouldn't be moved up just because of access to facilities in Waverley, which are not close by and have to be reached by car. Waverley's facilities are also under pressure, and cannot be relied on.

With regards to the settlement boundary, this is opening the door for relentless planning applications and the potential development of unsuitable parts of the land. This ambiguity puts the entire site at risk, disregarding the assessment that suggests leaving certain areas untouched.

A lot of comments raised concerns about insufficient infrastructure to support proposed development – generally the infrastructure needs improvement before any more new homes are built. Any further development will add pressure to schools and doctors surgeries. The local school is oversubscribed, as is the GP practice (Holly Tree Surgery) as per CQC guidance. The local surgery has been in special measures failing to provide what was an excellent service. Holt Pound is currently serviced by a single-form entry primary school.

With regards to mitigation of impact, a comment notes developer funding will be required cross boundary into Surrey. Also, objection is raised to the wording under 'Infrastructure Requirements - Health'; Contributions are not for Rowlands Castle Surgery to provide additional capacity. This must be corrected to Holly Tree Surgery, the closest GP Practice, and include contributions to Farnham Hospital.

The majority of the comments relating to infrastructure commented on transport, road/pedestrian safety, road junction and lack of public transport. General comments saying the development would cause an increase in congestion which isn't acceptable. Comments note that the A325 is already very busy/congested (attributing this to development in Bordon), and that Echo Barn Lane is used as a cut through to Farnham.

The junction with the A325 is hazardous and it is increasingly unsafe to attempt to turn right onto the A325. Increased likelihood of an accident. Vehicles turning right create long queues. There is a problem with parked cars near the junction from the Bewley Home site. Question how long it will be until traffic lights, roundabout or street lights will be needed on this junction – which will cause more urbanisation.

Concern about pedestrian safety. The main roads are narrow and pothole laden, there is no footpath from the proposed site leading to Fullers road and from there, there is only a narrow single side pavement (Linden side). There are no street lights. Fullers Road is narrow in part.

This would have a devastating impact on the peaceful enjoyment of the village square as a semi pedestrianised shared space. It would put an end to the hopes of the local community that the village square would continue to evolve as a hub of village life by becoming less of a thoroughfare not more. Wrecclesham is in need of a bypass.

Related to the comments about traffic congestion, concerns have been raised about air and noise pollution. It is green spaces like this that maintain air quality.

Questions asked about managing safe access to the site – particularly how the track leading onto Fullers Road could be expanded safely. This wouldn't provide a healthy lifestyle option for walking and cycling – it would be a dangerous small road to walk and cycle on, sharing it with delivery vans.

The development of this would have an adverse impact on an important amenity to Holt Pound residents. The public footpath which borders the site is popular for walkers and the development would be visible from the footpath. The footpath connects through to Rowledge and Alice Holt forest - development would reduce access to these amenities. This proposed development would lead to loss of privacy for the homes along Holt Pound and Fullers Road. It would also increase light and noise pollution.

Respondents raised concerns about flood risk, saying the site and its access road are prone to flooding. The site is next to the Bourne Stream. The clay site has extreme amounts of surface run off water from the A325 and adjacent areas that already flood its service road and surrounding drainage ditches. The land in the area comprises heavy clay and even installing on-site drainage would push the problem further down the line without the already much needed improvement in infrastructure. With the expected increase in rainfall due to climate change, this can only get worse.

The slope on the site is such that when looking at the levels from the eastern side, the north perimeter is about the same height as the roof of properties on the south. Already the rear gardens of these properties flood after anything but the lightest of rain with the water draining through gardens and flowing down Fullers Road towards the boundary with Rowledge and Bourne stream.

The site does not have a gentle slope as stated. Properties on the southern perimeter are some 20 feet below the level of the footpath on the northern perimeter and have historically suffered flooding. Being heavy clay, the land cannot absorb the rainfall and this usually results in flooded, unusable gardens and a river flowing down Fullers Road during heavy rain. Putting properties on this site would only exacerbate the problem.

Concerns have been raised about the loss of wildlife; particularly bats, toads, frogs, deer, badger, reptile and significant birdlife. The additional housing will impact the biodiversity within the area which is crucial to the community and future of Holt Pound and surrounding domains. This should be avoided at all costs. The site is also located within the Wealdens Heath Phase Special Protection Area buffer zone. Unclear how will achieve 10% BNG. In line with the East Hampshire Welfare and Wellbeing Strategy, suggest committing to leaving the rest of the site as a green space, for the health and environmental benefits that this would provide to the local residents. If the undeveloped portion of the site is no longer being used for the grazing of horses, it could be planted with trees or allowed to evolve naturally into woodland.

Concern raised about the impact of development on the landscape and character of the area, some comments noting that the site is close to the SDNP. The valley has a high landscape sensitivity - meaning it is unlikely to be able to accommodate change without extensive degradation of character and value. Moreover, being a dark skies area with no street lighting and bordering a national park, it is crucial to preserve the natural beauty and tranquillity of this location. A lot of comments noting the rural/semi-rural character of the area, stating this had been identified in previous assessments, and that this proposed development would add to the urbanisation of the area. The proposal is at odds with the setting, form and semi rural character of Holt Pound, and its scale would be disproportionate to the size of the existing settlement and a suburban infilling of green space. The site also helps differentiate Holt Pound from Rowledge and Wrecclisham which are more suburban

areas. It is also out of proportion to the size of the existing settlement, which is mainly linear. This small settlement, known for its rural charm and proximity to Alice Holt Forest, derives its unique characteristics and overall aesthetic appeal from the surrounding greenfield spaces.

As such, the design of any development is important. Comments saying the design is disappointing, with housing identical housing to anywhere else.

A lot of comments concerned about sprawling development – eventually creating one large suburban sprawl rather than countryside setting. The site threatens the separation and distinctiveness of Holt Pound versus neighbouring settlements such as Rowledge and Wrecclesham. This encroachment could potentially lead to the merging of these settlements into a single large urban sprawl, which goes against the EHDC's policy of preserving distinct settlements and avoiding the merging of communities. It is essential to protect Holt Pound as a Hampshire hamlet and prevent the loss of its unique identity.

The proposal is contrary to proposed planning policy; The Draft Local Plan Objective B1 (Providing better quality, greener development in the right locations) states that the Local Plan will: Make sure that new developments are located to maintain and improve the quality of built and natural environments, including our high-quality and valued built heritage and landscapes, whilst maintaining the integrity of existing settlements and their settings. Developing this site in Holt Pound, would directly contravene this objective with a disproportionate scale of development of a type that would represent sub-urbanisation.

The Farnham Neighbourhood Plan seeks to preserve the green space between Wrecclesham and Holt Pound / Rowledge, and this proposed development will threaten this agreed plan. The Farnham Neighbourhood Plan which covers the green space adjacent to this area in Surrey specifically highlights the need to preserve this green space to prevent coalescence of villages.

Greater consultation with Surrey and recognition of the significant developments that have occurred in recent years in Wrecclesham and Rowledge is required.

Alternative uses were proposed; a retirement development. Equally, alternative sites were proposed, stating development should be on brownfield and obsolete commercial property.

General comments that the Local Plan is allocating more homes than is needed, and that the SDNP plan needs to be factored in as it may provide more homes.

Binsted PC consider that the combined housing developments would put unacceptable pressure on all aspects of local infrastructure including roads, water supply, sewage treatment and health care, as well as fundamentally changing the rural character of the area. The development of the site would impact Grade 3A farmland/valued landscape, thus adversely affecting the biodiversity and nature including the River Wey and chalk aquifer. For these reasons, Binsted PC consider the proposed site allocation would conflict with policy NBE10 and the Government's 'brownfield first' policy. However, they do suggest building on rural brownfield sites for affordable housing.

Waverley Borough Council note that the site allocation is very close to our mutual boundary and recognises local residents concerns about highway safety and the capacity of infrastructure. Waverley BC request that the potential impact on the amenities and provision of facilities in Waverley is fully addressed.

Thames Water do not envisage infrastructure concerns regarding wastewater needs.

The Defence Infrastructure Organisation has responded in relation to the RAF Odiham height and bird strike safeguarding zones. Development exceeding 91.4m high will trigger consultation requirement and might result in the creation of attractant environments for large and flocking bird species hazardous to aviation.

The Environment Agency notes that the site is located at the headwater of the Farnham Bourne. They suggest a site-specific policy to ensure a large undeveloped buffer zone of at least 10 metres to the watercourse and require a commitment to the restoration of the Farnham Bourne. A SFRA is recommended which demonstrates that the development will be safe for its lifetime.

Natural England agree that recreational disturbance by the proposed allocated sites on the Wealden Heaths SPA and SAC sites will need to be appropriately mitigated and any bespoke mitigation will need to be agreed with Natural England and secured in perpetuity.

SDNPA consider that the site is in the setting of the SDNP and will therefore require policy criteria to ensure that the design of development is landscape-led, and that any potential adverse impacts on the SDNP are avoided or mitigated. This could include, but is not limited to landscape character, views, tranquillity and dark night skies

Hampshire County Council have made representations in response to access arrangements. Although they note that the site is adjacent to the existing settlement boundary, it is considered that the site is not within easy walking distance of a range of services, although the suggestion that the site could be connected into the existing PROW network is supported. At present the footway infrastructure to connect the site to Rowledge village centre is of low quality and variable width and there is currently no cycling infrastructure. HCC advise that applicants should demonstrate how suitable active travel connections can be provided so that residents can access key facilities without relying on the private car.

Subject to the necessary regulatory tests being met, the County Council will seek off-site contributions for surface improvements to Footpath Headley 19 on the northern boundary of the proposed site, along with contributions to Bramshott Common.

Surrey County Council has submitted representations in respect of Highways, Education, Minerals and Waste and Environmental and Flood Risk.

The Highways Authority consider that given the location of the proposed site in close proximity to the Surrey Border, there could be a direct impact on the Surrey highway network. Therefore, it is suggested that a Transport Statement should be produced outlining the proposals, pedestrian and cycling infrastructure and any additional impacts on the highway network.

Any proposed development in East Hampshire is likely to impact on secondary schools in the Farnham and Haslemere areas. Secondary school sites in Farnham have limited or no ability to expand. Hampshire County Council, as the Local Education Authority, is best placed to comment on any need for additional school places.

Surrey County Council note that the proposed site allocation is located approximately 600m from Alton Road Sandpit. Due to its proximity, it is requested that Alton Road Sandpit and SCC's minerals development framework are clearly referenced within the list of constraints and opportunities associated with site allocation HOP1. Any necessary measures to mitigate the impacts of operations at Alton Road Sandpit to acceptable levels would need to be designed and implemented by the applicant/developer in line with paragraph 193 of the National Planning Policy Framework 2023.

CPRE Hampshire, the Countryside Charity has raised objection to the proposed site allocation on the grounds that it has re-assessed as a Tier 3 Settlement but is essentially a small hamlet. Therefore, it should return to Tier 4. It is considered that the proposed form of development would be at odds with the setting, form and semi-rural character of Holt Pound and should be withdrawn.

The RSPB considers that the statement from EHDC regarding mitigation for potential impacts on the Wealden Heaths European SPA & SAC sites fails to provide any detail on

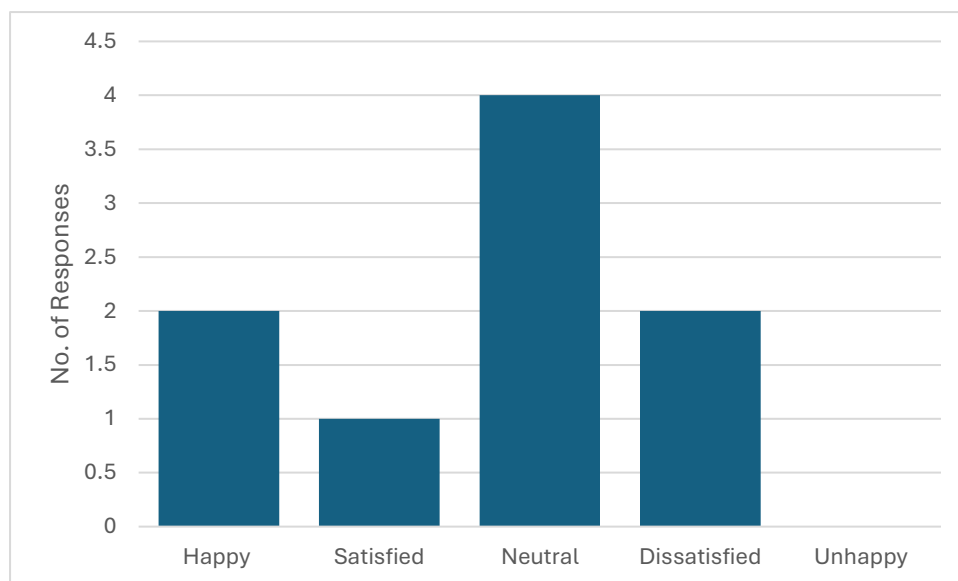
what mitigation could be provided in order to guarantee beyond all reasonable scientific doubt, that the mitigation will mean that the project will not adversely affect the integrity of the WHPI SPA. It is therefore considered that it would not comply with the Habitats Regulations.

The Fullers Road Residents Group strongly object to the proposed site allocation on the grounds of impact on the countryside, landscape, SPA & SINC sites, SDNP, disproportionate scale of development, surface water flooding, precedent and connectivity to amenities.

The Woodland Trust due to the presence of a notable/important tree on the boundary of the site, it is suggested that the tree should be noted in the constraints and that appropriate root protections are specified.

The site promoter fully supports the sites inclusion, confirming its suitability, availability and deliverability. The representations seek to address some of the concerns raised in other representations such as flood risk, character, access, impact on the SPA, green infrastructure, drainage, BNG, sustainability, infrastructure requirements and quantum of development and design.

Question: Site CTN1 Land at Parsonage Farm - How do you feel about this site?



Question: Site CTN1 Land at Parsonage Farm - What are your comments on this site?

There were a number of comments of support for the site due to its being centrally located and assisting in consolidation of the settlement. However, comments noted that any potential development should not be for large, expensive homes and catered towards smaller house types to meet needs. It was noted the site could align with a rural exceptions policy and would also provide an opportunity for self-build.

Despite the land being unused for a number of years, one commented suggested it should be reverted back to its former use as a working farm. In terms of concerns raised, some considered it was open countryside and would erode the gap between Catherington and

Horndean. There were also comments expressing disappointment at the loss of the layby in front of the site, which is utilised by parents dropping students off at the nearby school.

Horndean Parish Council have concerns that it closes the gap between Horndean and Catherington. They also express highway concerns with the layby removed, that is used for school. It is also acknowledged that it is adjacent to the Catherington Conservation Area where build style and materials need to respect the vernacular of the surrounding buildings. They also noted the need to address traffic and sewage issues on Catherington Lane.

Historic England have noted that heritage impact assessments are needed for both sites CTN1 and CTN2.

Natural England recommend that the Council have due regard to the proximity of this SSSI and any impacts that could occur as a result of these allocations on its special interest features. They also note the close proximity to the SDNP and state that any nutrient budgets and assessment, and any nutrient mitigation proposals must be agreed with Natural England and securable in perpetuity.

The Environment Agency confirm the site is in an inner source protection zone and future applications would need to work closely with the EA and Portsmouth Water.

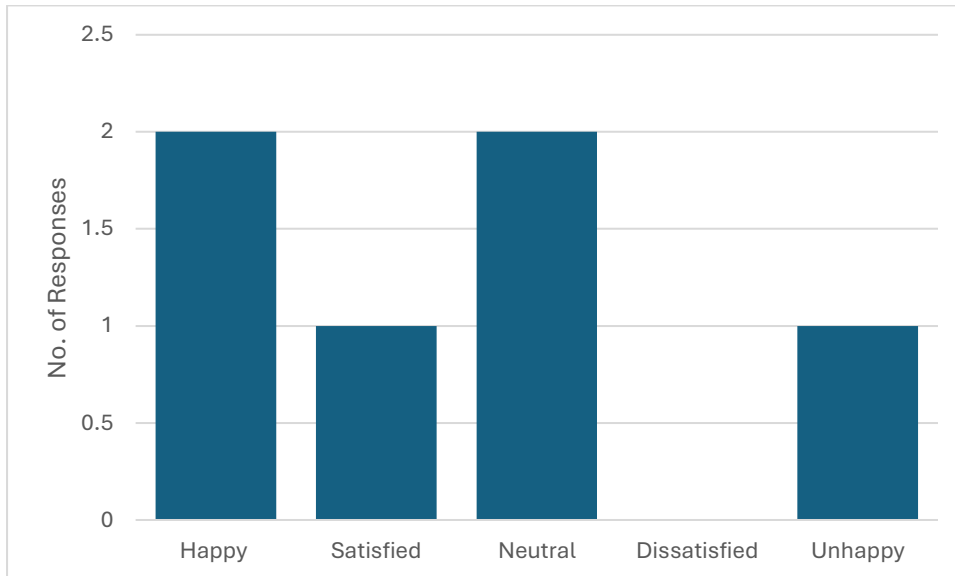
Portsmouth Water notes the site falls within Source Protection Zone 1 and any development requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development

NHS note that developer contributions (e.g. by a s.106 contribution) will be required towards either the extension of Horndean Surgery or a replacement surgery at Clanfield.

South East Hampshire Ramblers Association question the impact that landscaping might have on the enjoyment of the footpath to the north and extent it might obstruct it in the future. They question connecting the development to the PROW.

The site promoter supports the sites inclusion, acknowledging that the site is relatively well located for accessing some local facilities in Catherington by walking or cycling and both sites score above average in the Council's Accessibility Study. They also advocated further land to the west for inclusion.

Question: Site CTN2 Land at the Dairy - How do you feel about this site?



Question: Site CTN2 Land at the Dairy - What are your comments on this site?

There were a limited number of comments made in regard to this site. There was general support for the reuse of previously developed land and it was considered a smaller site has less impact on existing infrastructure. It was noted the site could align with a rural exceptions policy.

One comment was concerned about accessing the site and one comment questioned whether an industrial unit is also required (in line with a recent application), but advocated a need for a mix of house types and different sized dwellings.

Horndean Parish Council note the close proximity of the Conservation Area, which would provide an unsuitable location for self-build. They also noted the need to address traffic and sewage issues on Catherington Lane. Horndean Parish Council also have concerns that it closes the gap between Horndean and Catherington.

Historic England have noted that heritage impact assessments are needed for both sites CTN1 and CTN2.

Natural England recommend that the Council have due regard to the proximity of this SSSI and any impacts that could occur as a result of these allocations on its special interest features. They also note the close proximity to the SDNP and state that any nutrient budgets and assessment, and any nutrient mitigation proposals must be agreed with Natural England and securable in perpetuity.

The Environment Agency confirm the site is in an inner source protection zone and future applications would need to work closely with the EA and Portsmouth Water.

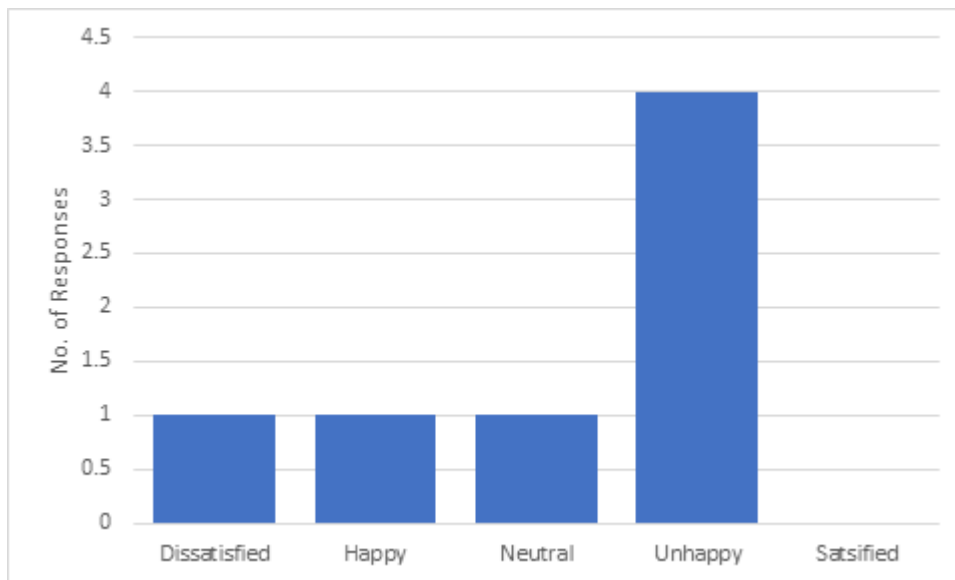
Portsmouth Water notes the site falls within Source Protection Zone 1 and any development requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development

NHS note that developer contributions (e.g. by a s.106 contribution) will be required towards either the extension of Horndean Surgery or a replacement surgery at Clanfield.

South East Hampshire Ramblers Associated question the need to connect the development to the PROW.

The site promoter has confirmed the availability of the site and advocate that the site would make valuable use of previously developed land. However, concerns are raised in regard to providing contributions to a replacement doctors surgery in Clanfield due to the viability associated with remediating the site.

Question: Site LOV1 Land rear of 191 - 211 Lovedean Lane - How do you feel about this site?



Question: Site LOV1 Land rear of 191 - 211 Lovedean Lane - What are your comments on this site?

A few queries as to why this site has been included given the planning status.

Concern raised about cars on New Road, suggesting this proposal will make the situation worse. Concern raised about flood risk, saying the road floods badly, and impact on the character of the area.

Lovedean is a village and amenities are already stretched. Developer contributions should be used towards improving the roads and amenities in the local area.

This proposed development does not align with the policies included with the EHDC local Plan.

Environment Agency

Source Protection Zone, 1,2 & 3, secondary aquifer.

Groundwater Protection - This site is in an inner source protection zone. These are set up for the Havant and Bedhampton Springs. Which provide a strategically important public water supply. As such there it is likely that there will need to be tight controls on any development to ensure risks can be adequately managed. As with the current permitted applications, any developer would need to work closely with us and Portsmouth Water to ensure the risk are appropriately managed and controlled.

We would also highlight that there is the potential for karstic feature to be present within the new allocation areas. A careful assessment of karstic risks should be undertaken as part of any development investigations.

HCC highways

The site is considered to be in a sustainable location, however there are shortfalls in pedestrian facilities within the vicinity of the site. Pedestrian improvements required along Lovedean Lane with funding from the developer.

The County Council request that the following wording, or similar, be added: 'Development of this site should contribute towards the improvement of the walking network in the vicinity of the site in order to maximise opportunities for sustainable travel'

HCC education

See rep for requirements

Historic England

Object Proportionate HIA is needed to inform the allocation

Integrated Care Board (ICB)

Horndean Surgery is currently undertaking expansion (internal reconfiguration) works for the surgery and for wider use by the PCN. Additional expansion will be required to support primary care provision within East Hants in the future.

Natural England

Solent designated sites (SPA/SAC/Ramsar)

The site allocations listed below fall within the Solent catchment area and are subject to demonstrating robustly that they achieve nutrient neutrality, in accordance with Policy NBE9. We advise that you make clear use of Natural England's latest guidance on achieving nutrient neutrality for new housing development (January 2024). This guidance has been published alongside an updated nutrient calculator. Please see further information in later chapters and our HRA comments regarding nutrient neutrality.

Nutrient budgets and assessment, and any nutrient mitigation proposals must be agreed with Natural England and securable in perpetuity.

The following sites fall within close enough proximity to the boundary of the South Downs National Park that they could have potential negative impacts to its landscape features and special qualities and must therefore consider Policy NBE10. We advise that you seek the views of the landscape advisor/ planner for the National Park for their knowledge of these sites and the wider setting, together with the aims and objectives of the park's management plan and how this can be considered through the Local Plan.

Natural England advise that the Council need to undertake a landscape assessment/ landscape and visual impact assessment (LVIA) to demonstrate that these site allocations are deliverable in their current locations. The Plan correctly identifies that landscape impacts should be considered across these allocations, yet it does not conclude that the Council has

conducted its own assessments to justify the sites. Given the scale of some of these developments and the varied topography across the Local Plan Area, Natural England recommend that a landscape assessment to underpin this Plan is necessary. We would expect appropriate consideration through the Plan to further the purposes of the National Park's protected landscape features, characteristics and special qualities.

Portsmouth Water

Source Protection Zone 1. This site is underlain with Chalk which forms the principal aquifer used for public water supply. There are no mapped solution features within the site boundary, however there are many present in the local vicinity so there is potential that solution features could be present on site. Groundwater is relatively shallow (>15mbgl). Any development of this site requires an assessment for the likelihood of the presence of solution features and groundwater protection measures must be considered during the construction phase and over the lifetime of the development. Within SPZ1 and shallow groundwater environment's, we have presumption against pilling as this can lead to pollution. We therefore expect to see a piling risk assessment (environmental) to be produced to assess the risks and develop mitigation measures to protect impacts to groundwater quality.

Horndean Parish Council

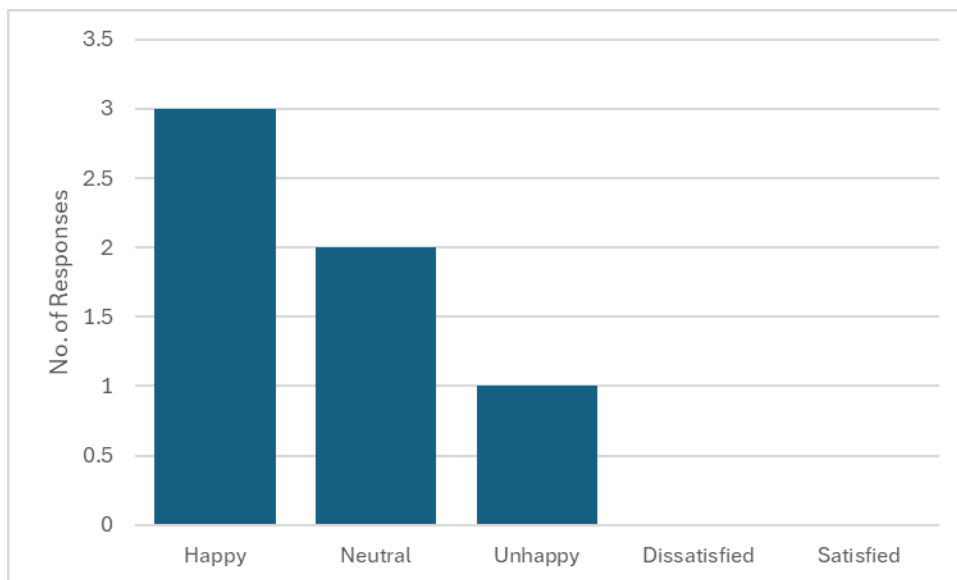
Development here has already been approved, in principle, subject to reserved matters. The only comment to add here is that the impact of this development is that the infrastructure requirements should be looked at cumulatively together with Catherington Park, Woodcroft Farm, Woodcroft Copse and the "in-progress" Lovedean Lane in-fill developments. All of these are taking place within a mile stretch of Lovedean Lane/Milton Road. The net effect on population and traffic is huge, the "main" roads are inadequate, and the convenience stores are not suitable for the weekly shop.

SE Hants Ramblers Group

Connecting the site to FP 28/1 is supported provided it conforms to the character of the PRow at this part of the boundary.

Chapter 13 Appendices

Question: Appendix A Background Information - How do you feel about this?



Rowlands Castle Parish Council suggested replacing the word 'complimenting' with complementing.

Question: Appendix B Abbreviations and Glossary - Is anything missing?

A small number of comments – nothing identified as missing. Acknowledge it's a long document so will be a lot of information here.

Not possible to identify what 'SINC' stands for as that abbreviation has not been included in the Glossary.

Policy HWC.1c. mentions 'blue corridors'. This term is not defined in the supporting text or in the Glossary. It is recommended that this term be defined.

The penultimate paragraph in Policy DGC5.1 mentions 'the green network', but this term is not defined, nor can it be found in the Glossary. Similarly, the term 'place making' is not understood. These terms should be clarified.

The SDNPA request the amendment of wording to:

National Park: The English National Parks are recognised as landscapes of exceptional beauty which have been fashioned by nature and the communities which live in them. The National Parks & Access to the Countryside Act 1949(the 1949 Act) enabled the creation of the National Parks to ensure that the nation's most beautiful and unique landscapes will continue to be protected for the future. The statutory purposes of National Parks are to conserve and enhance their natural beauty, wildlife and cultural heritage of the area; and to

promote opportunities for the public understanding and enjoyment of their special qualities of the National Park by the public.

The SDNPA suggests the additional following of wording;

South Downs National Park (SDNP): The South Downs was designated as a National Park on 31 March 2010 and includes 1,600 square kilometres (sqkm) of England's most valued lowland landscape.

South Downs National Park Authority (SDNPA): The Local Planning Authority (LPA) established on 01 April 2011 for the South Downs National Park (SDNP).

Rowlands Parish Council suggest the definitions of the following should be added:

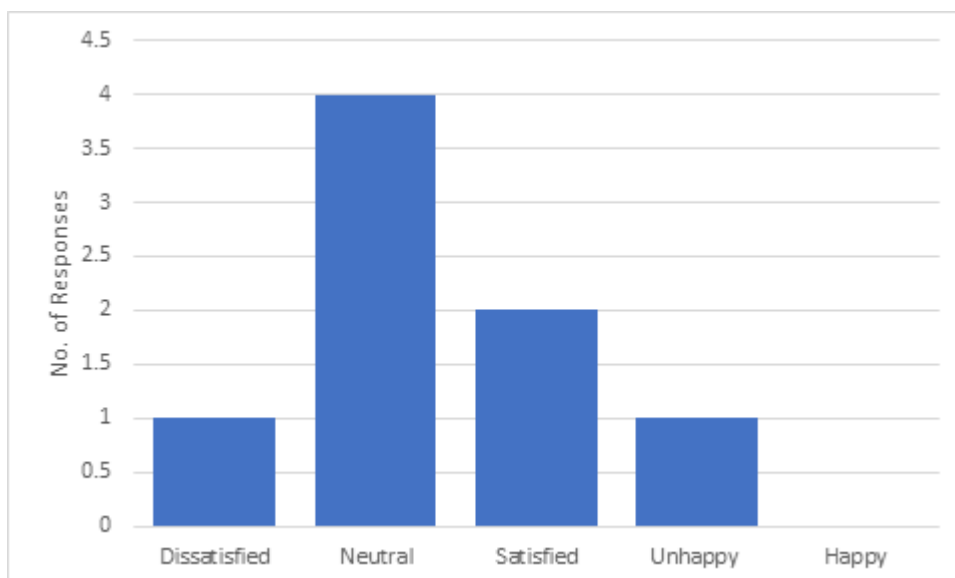
Appendix B: Abbreviations and Glossary

Definitions of the following should be added:

- Local Green Space – referred to on pages 274, 441, 446, and 447
- Rural Exception Sites
- Transport Assessment - referred to in paragraph 8.39 on page 194
- Transport Statement – referred to in paragraph 8.39 on page 194
- Windfalls

In addition, they consider that the draft Local Plan does not use consistent terminology throughout with respect to 'permissions'. This category is variously described as 'existing planning permissions', 'current planning permissions', 'permissions' and 'outstanding permissions'. The 'Glossary' does not give the definition of any of these terms. They propose that two definitions be used, that of 'Approved permissions' where the LPA has approved the application and 'Outstanding permissions' where an application has been made but has not yet been approved by the LPA.

Question: Appendix C Housing Trajectory - How do you feel about this?



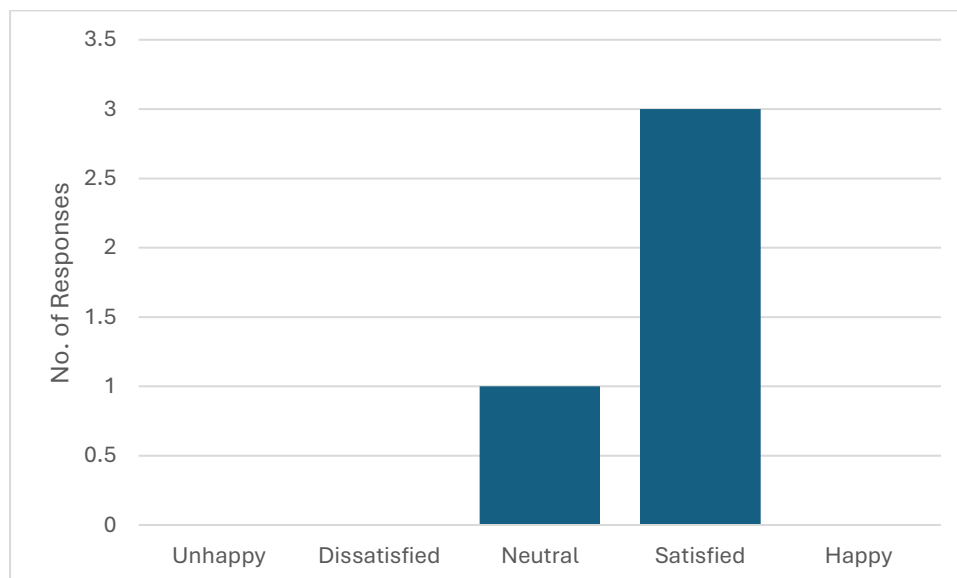
Question: Appendix C Housing Trajectory – What are your comments on this?

A small number of comments received in response to this question, mostly concerned about the amount of development on greenfield sites. Concerns raised about overdevelopment and loss of countryside, for those living in the district and those driving through – suggesting that eventually East Hampshire will be built up to the boundaries with the SDNP. Comments that development pressures should be better shared, rather than focussed on small areas like East Hampshire.

A comment that population growth forecast suggests that the biggest growth is in the 65+ age group. However it is envisaged that the biggest demand will be for new build homes with 2 and 3 bedrooms. Querying whether this properly reflects the requirement for the 65+ cohort?

The House Builders Federation consider the housing trajectory insufficient if the Council are to ensure that housing needs are met in full across and that the plan is deliverable across the plan period. It is suggested that on key course of supply should be smaller sites of less than 1 hectare.

Question: Appendix D Guidance on Marketing Requirements - How do you feel about this?



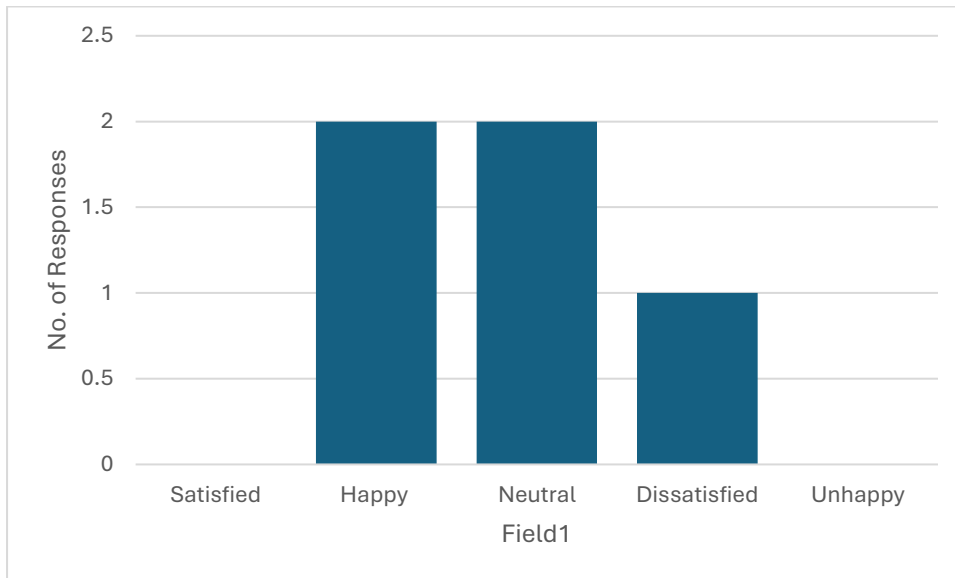
Question: Appendix D Guidance on Marketing Requirements – What are your comments on this?

Few comments received, mainly commenting that the LPA needs to be satisfied that site has actually been used for the previous use as stated and that due diligence is played to the assessment of any marketing exercises etc.

A comment suggests that 12 months could be excessive for the release of public sector land and buildings and that there should be greater flexibility.

Various references to Appendix 3 which should read appendix D.

Question: Appendix E Proposed Quantity and Accessibility Standards for Open Space - How do you feel about this?



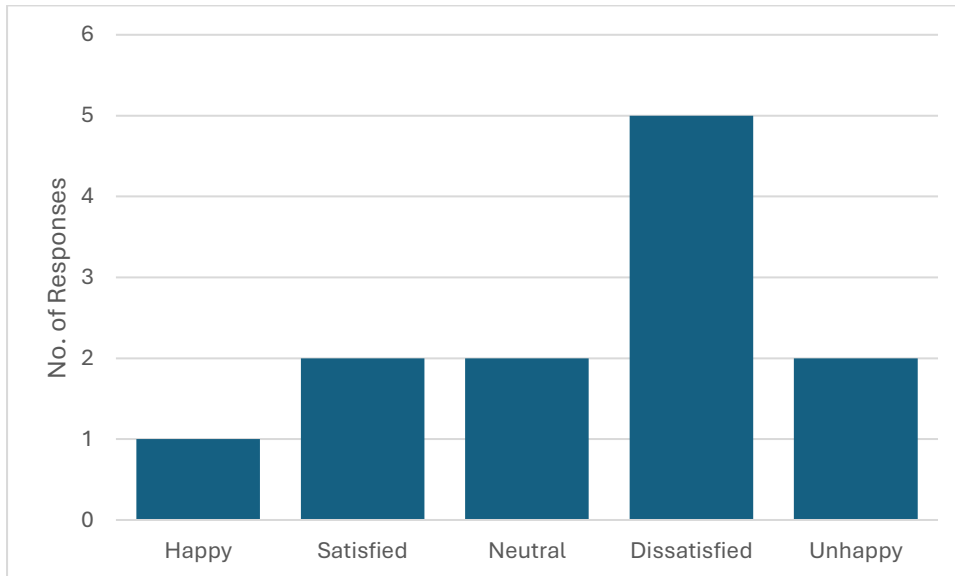
Question: Appendix E Proposed Quantity and Accessibility Standards for Open Space – What are your comments on this?

Need more open spaces. Standards should be adhered to and developers not given opportunities to vary conditions imposed.

Needs to be more provision for young people/teenagers.

Representations received on behalf of Bellway Homes Ltd has indicated what appears to be a typographical error on the provision for children and young people under the Proposed Quantity Standard column. This states that there should be 0.53 sites per 1000 head of population for provision for children and 0.27 sites per 1000 head of population. We suggest that this should refer to 0.53 ha per 1000 head of population and 0.27 ha per 1000 head of population respectively.

Question: Appendix F Vehicle Parking Standards - How do you feel about this?



Question: Appendix F Vehicle Parking Standards – What are your comments on this?

There was a small amount of support for the Vehicle Parking Standards. Pleased that the Parking Standards recognise the need for sufficient resident and visitor parking, but needs to be enforced on all applications. A lack of visitor parking is a common on new developments and a cause of tension.

Many comments raised concern about the minimum size of a car parking space being unsuitable for the increasing size of modern day cars, particularly SUVs. Many comments stated that minimum car parking spaces must accommodate the largest of modern day cars, as well as allowing for the opening of doors in spaces and all populations (elderly, disabled, family access). Similar comments were also made in relation to the size of garages, in that they should be able to accommodate modern day sized vehicles, allow for doors to open and to be able to walk around the car.

All parking spaces for residents should be close enough to properties to allow access to an electric charging point. Long term consideration should also be given to the positioning of shared electric charging points. Comment was also made that the Parking Standards should mandate larger parking spaces for electric charging, to allow excess space for equipment and wall/floor mountings.

Multiple comments made reference to a greater need for additional car parking spaces per residence, due to children remaining in the family home for longer and thus consequential impacts of increasing car ownership per household. It was also stated that there was a greater need for off road parking in residential developments, as many households can have multiple vehicles still parking on the road, even when they have a driveway.

The increase in home deliveries from online shopping needs to be considered and accommodated for. Negative comment was received about how commercial and utility vehicles have had detrimental impacts on the pavements by parking on the road and

causing damage that has not been repaired. It has resulted in pavements not being thought suitable or safe to walk on.

A change was also suggested to public car parking tariffs to encourage greater support and patronage at the districts shops, particularly Alton, by allowing a “first hour free” option across car parks.

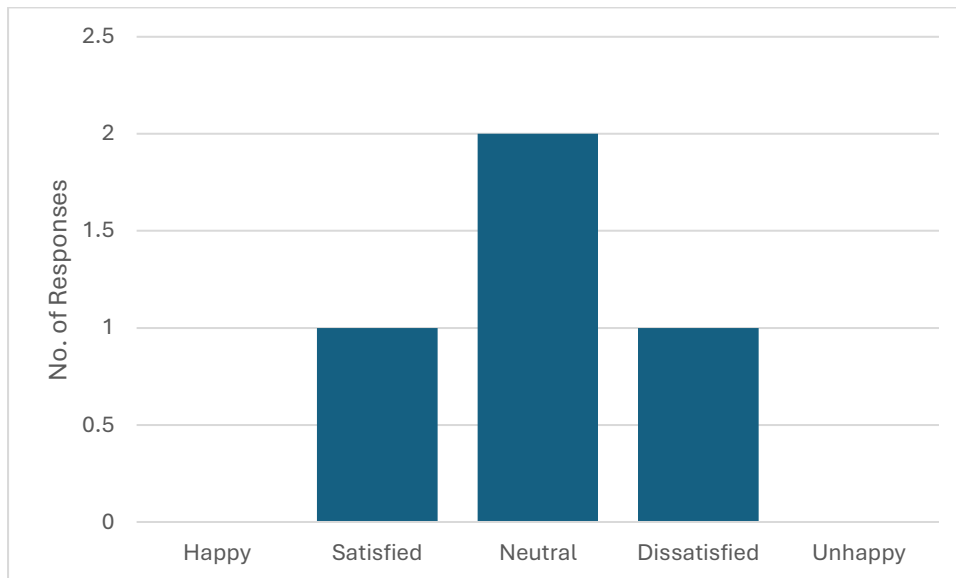
Rowlands Castle Parish Council has suggested some changes to the Vehicle Parking Standards: the standards applying to change of uses as well as new developments; the standards including staff vehicles parking for certain uses; and that standards need to be more thorough regarding places of worship, as not all have a fixed number of seats.

Comment was made that to reduce vehicle parking standards any further, there must be an improvement made to public transport and easy access to quality employment opportunities.

A number of comments were also received in relation to cycle parking standards. The number of cycle parking spaces per household was perceived as low and instead it was suggested better to have a number of cycle spaces equivalent to the households number of bedrooms. The example of a 4+ bedroom house having 2 cycle parking spaces was made as insufficient and would be a deterrent to getting more of the population cycling. It was also expressed that the current cycle parking standards was seen as inadequate to achieving the sustainable transport policies in the Delivering Greener Connections chapter of the Local Plan. The size of cycle parking spaces was also commented on being too small, especially with an increase in cargo bikes which need greater storage space.

Petersfield Climate Action Network (PeCAN) made comments regarding cycle parking standards in their response. They also commented on the need to increase cycle parking spaces and that this relates to LTN 1/20 and the Equality Act 2010. PeCAN also commented on the dimensions of garages and that how they should be designed large enough to allow access to a cycle without removing a car. PeCAN also suggested measures and text to be included to make cycling as appealing as driving a car, specifically surveillance for security; businesses with at least 10 employees should provide facilities for showering and changing as well as secure cycle storage; and covered cycle storage at public locations that generate many trips, particularly for e-bikes.

Question: Appendix G Table of Local Plan Superseded Policies - How do you feel about this?



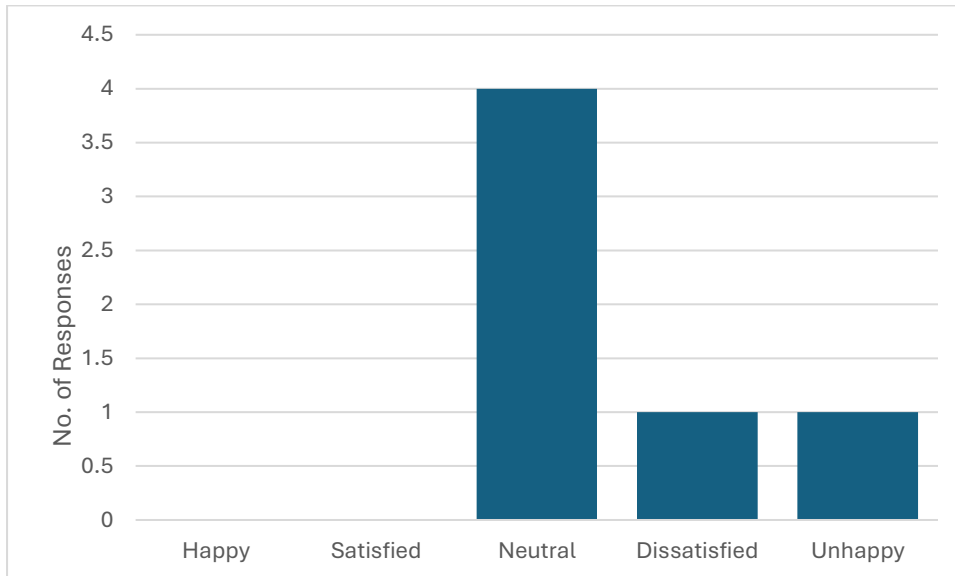
Question: Appendix G Table of Local Plan Superseded Policies – What are your comments on this?

Very few comments. Too much information to read.

A separate comment about affordable housing viability arguments.

Rowlands Castle Parish Council has queried the replacement of policy CP27 – Pollution of the JCS with policy DM11- Amenity and DM13 and requests that it should be specified if it is replaced by other policies.

Question: Appendix H Infrastructure Requirements - How do you feel about this?



Question: Appendix H Infrastructure Requirements – What are your comments on this?

A small number of comments received. One comment noted that there is too much information.

Other comments related to provision of affordable housing; in rural exception sites and schemes in remote rural settlements that are only being granted permission because they provide much needed affordable housing, in these cases viability arguments and an inability to procure a registered provider should stop the development happening. We will never secure the affordable housing we need in remote rural locations (Tiers 4 and 5) if this get out of jail free card exists; The ability for a developer to commute their need for affordable housing means that at the levels quoted for Headley then they will also move to market rate housing as the tariff is sufficiently low and is not a disincentive as they will make more profit on the market rate houses

One person noted that they can see provision for health, and waste management in the plan, but not provision for schools, leisure and other general facilities. They suggest improving the single line train track between Alton & Bentley. Additional infrastructure is needed if going to add the number of houses to Alton as shown in the plan.

There is no transportation planning here - solely a reference to sequestering funds on a plot by plot / development by development mitigation-based approach. Where is the strategic overview and proactive implementation of a mobility transition that fulfil both the climate crisis and local economy imperatives? It's lack of an appearance in these documents point to an adhoc approach that misses the opportunity that wholistic plan approach provides to redefine this fundamental aspect of the local life; and it ignores the current problems in many of the urban centres within the plan area.

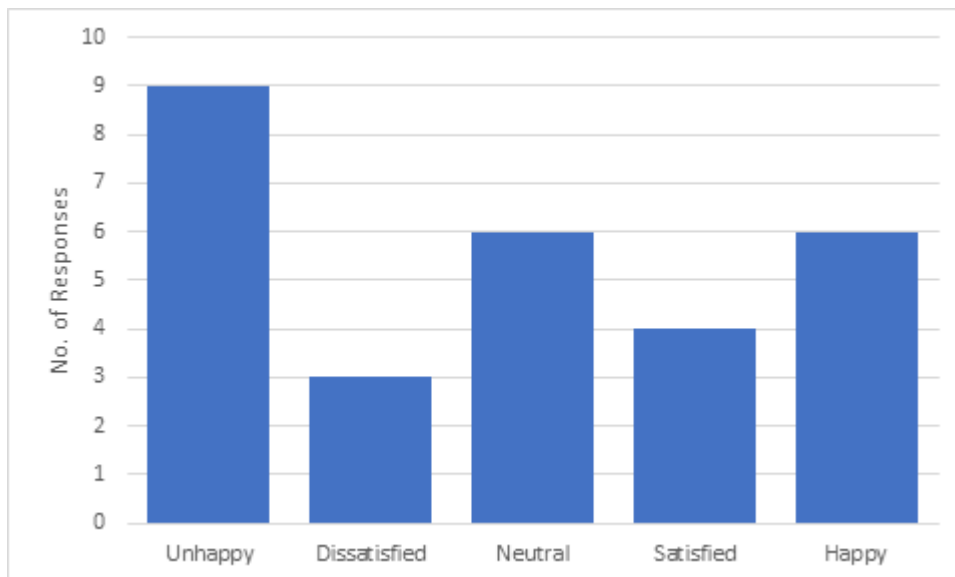
The ICB has stated that they will work alongside the council and developers to ensure that new healthcare facilities and land meets the needs of the local patients. They have requested that they will also need to be consulted on the terms of the S106 to ensure that there is no financial burden on either the ICB or the GP partners.

South and East Liphook Resident's Group consider that Appendix H (together with Policy DGC1) is not sound by omitting to identify infrastructure improvements that are critically needed. They have raised concern that very little is said about improving the infrastructure arrangements that exist presently and have highlighted the lack of GP's and schools and current issues such as traffic congestion, rainwater flooding, sewerage, power cuts, potholes and the lack of local buses.

One individual email received highlights the same issues as above and suggests that the Local Plan should be identifying where new or extended facilities should be and needs to allocate either new land or existing sites for intensification or expansion to meet the growth that has already taken place over the last decades.

Draft Policies Maps

Question: Draft Policies Maps – PM1 How do you feel about the Draft Policies Maps?



Question: Draft Policies Maps – PM2 What are your comments on this?

Some short positive comments saying easy to use, useful and that these are sensible alterations to existing boundaries.

Most of the remaining comments are specific to places or points on a map and are as follows;

Lasham attracted the most number of comments.

- The Royal Oak Pub is within the village red line. The pub and its land should be outside the red line so building more homes is restricted. It is a community asset and should be protected. Lasham is a small village, lacking in infrastructure and amenities and is totally unsuitable for any possible proposed development. There is no village hall. The pub is registered as a community asset.
- Excluding the Royal Oak in the way that the church has been, would provide an additional layer of protection and one which feels very in line with the spirit of your draft policies.
- The settlement boundary should exclude the area encompasses the church, the pub and the village green, which are all adjacent to one another. These are key and the only community facilities in the village and should be protected.

Beech

Representations have been received on behalf of the landowner of a site in Beech raising objection to the proposed revised Settlement Policy Boundary on the grounds of the omission of land at 'The Old Farm' which was previously proposed to be included in the SPB.

Medstead

- It is proposed to move the SPB to the west of Lymington Bottom Road, Four Marks, making the current planning application for 90 houses more likely to succeed. This will, in turn, open the door for even more development to the west/north west. Please reconsider this and protect the countryside corridor between Four Marks and Medstead.
- In terms of the new SPB for Medstead, further expansion along Hussle Lane/Abbey Road is encouraged. It is felt that the boundary to the north of Abbey Road should be pushed further northwards as it currently intersects through an outbuilding to the rear of Keyingham House. It also cuts across the majority of the rear gardens of the properties on the northern side of Abbey Road, including Redwood, Greenacres, Green View, South View, Netherfield, 21, 25, 29, 35 and 37 Abbey Road.
- Whilst it is noted in the Draft Local Plan 2021-2040 (Regulation 18) Interim Settlement Policy Boundary Review Background Paper January 2024, consideration 6 of the Medstead Proposed Changes to SPB that Where possible and to maintain continuity, exceptionally long gardens will follow the boundaries of adjacent properties with smaller curtilages, the line should encompass the entirety of these rear gardens or at the very least be drawn a further 30 meters north. This would allow for better continuity as more complete plots of properties could be included. This small adjustment would not result in any further encroachment into the countryside.
- It is stated in this consideration that Settlement boundaries do not need to be continuous and therefore there would be no harm in including the longer rear gardens of certain properties in this area of Abbey Road in the SPB.

An individual representation received outlines an objection to the extension of the Settlement Policy Boundary to include Five Ash Road and disagrees with the assessment of its character.

Four Marks

- Support the local plan policies map for Four Marks and the proposed allocation of land to the rear of 97-103 Blackberry Lane.
- The "town" centre of Four Marks is defined as Oak Parade on the A31. This is in fact a "motorway service station" supporting through traffic and tradesmen entering the villages each day. It is the source of 95% of the litter in the villages. Only a third of the houses are within a 20 minute walking distance and because of the hills involved most locals still drive to it. The ideal centre for the village would be around the Station.
- Need to ensure numbers for Four Marks are not increased and take into account flood risk

Bentworth

- Re Ivalls Farm, Bentworth, GU34 5 RB – querying why the boundary is changing and seeking an explanation.

Rowlands Castle

- The proposed Local Gap for Rowlands Castle is strongly supported.

Representations have been received on behalf of the interested parties of both Deerleap sites expressing that the allocation of both sites and associated proposed amendments to the settlement policy boundary reinforces the sustainable location within the village.

Catherington

Representations have been received on behalf of the interested party of land to the east of Catherington Lane raising objection to the proposed amendments to the Settlement Policy Boundary on the grounds that the site, in its entirety, wholly relates strongly to the existing built-up area of Catherington and not the wider countryside to the east. It is considered that there is insufficient justification for to replace a site which contains existing built form and relates strongly to the built character of the village, with a blanket Local Gap policy that is ineffective and unnecessary within this well-contained and sustainably located development site

Headley

- A query as to what is the Proposed Town, District and Neighbourhood Centre that is located where the Holly Bush Public House is currently located?
- The NB11 Gaps can now be filled according to other documents in this pack. Does this now mean Headley can join onto Lindford?

Holt Pound

- The Settlement Boundary is being proposed to extend around a large site that is existing countryside (HOP1). The LAA has an indicated amount of 19 dwellings

(about 1/5 of the site area) so i would like the Settlement Boundary drawn to only enclose a much smaller part of the site to prevent the developer from extending and filling the whole area at a later date.

Representations received from Fullers Road Residents Group object to the proposed site allocation at Fullers Road (HOP1).

Individual representations received note that the area is adjacent to the County boundary and is protected by the Waverley Local Plan as an Area of Visual Interest. This should be taken into account to ensure that the integrity and purpose of this open space is maintained.

It is considered that the site is within countryside and an important contributor to the character of Holt Pound which sits between Holt Pound, Rowledge and Wrecclesham and helps separate/differentiate.

Alton

- Objection to the Draft Policies Map for Alton, see objections raised in respect of Policies S1, S2 and H1
- The SBP around Alton remains fit for purpose in maintaining separation between Holybourne and Beech, whilst preserving the views into and out of Alton. Strongly discourage amending the policy boundary as it would create irreversible visual impacts across the SDNP.

Bramshott

- Our submission for extending the SPB to include Holly Cottage, Woolmer Lane GU30 7RA was reviewed but turned down for the following reasons: The dwellings are considered isolated development which is physically and visually detached from the settlement (Principle 3b). This might be a reasonable conclusion from a desktop study. However on the ground the property is not visually detached as it can be seen from adjacent houses. The reason it has been assessed as physically detached is because the northern lawn in The Oaks, not in the SPB, separates the two houses. On maps it is represented as a field when in fact it is a lawn associated with the house. There is a natural boundary which would lead from the current SPB to encompass Holy Cottage and possibly Peppercorn Cottage. These are both very old properties and are very much part of the Village cluster.

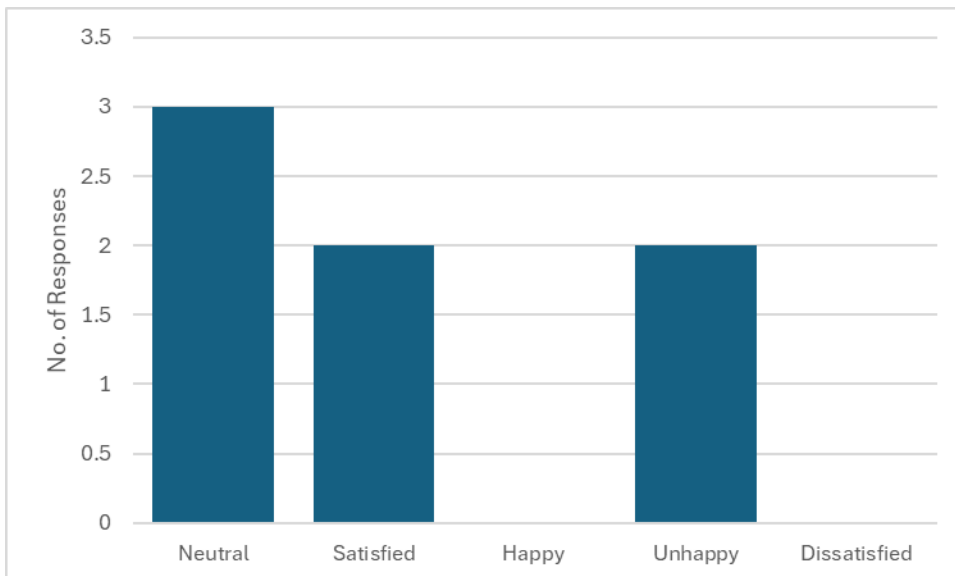
Other comments

- Much of "The Proposed Town, District, Local and Neighbourhood Centre" for Clanfield is in Horndean.
- See supporting document submitted specifically in relation to The Old Farm, No. 76 Wellhouse Road and the proposed SPB changes for Beech.
- Need to see population figures and densities within these proposals to allow us to understand proportionally how the proposed developments will increase populations in the respective areas.

- That key contextual information isn't in these maps
- Infrastructure concerns relating to new homes
- This should be presented with the SPB review background paper
- A specific query – “our house and garden is not included in the Settlement Boundary despite: Our immediate neighbours in Church Farm Place being included, Our home being listed grade II, Our home being in the Conservation area”
- A detailed response about Land at Aurea-Norma, Ropley.

Supporting Evidence

Question: Supporting Evidence - EV1 How do you feel about the supporting evidence?



Question: Supporting Evidence - Ev2 What are your comments on the Integrated Impact Assessment?

Representations received from Natural England and Hampshire County Council offer general support.

Alton Town Council consider that the IIA does not adequately address reasonable alternatives.

Binsted Parish Council query whether the scoping report covered the late addition of Neatham Down as an allocations and comments from the statutory agencies.

Representations received from Developers/site promoters relate to site specific comments which largely query the conclusions of the IIA and site omissions.

Individual comments largely express objection to site specific allocations such as ALT 8. A small number of comments. A small number of concerns relate to perceived data inaccuracies and omissions.

Question: Supporting Evidence - EV3 What are your comments on the Habitats Regulation Assessment?

(Natural England) NE continue to work closely with the Council on the next iteration of the HRA. However, comments are as follows: (1) The HRA will need to address recreational pressure for the East Hampshire Hangers SAC. (2) The allocation at Neatham Down partially falls within the smaller catchment hence disagree with the LSE – LSE could be present as a result of the strategic housing at Neatham Down on recreational pressure. Further information is required in the HRA to assess this. (3) The River Itchen SAC (Water Quality) – The LSE assessment has not fully considered the potential for LSE from FMS4 and FMS1. It is understood that these developments will not be able to be served by a WWTW and will be served by a private on site PTP. There is uncertainty on where this will ultimately be discharging to. NE therefore disagree that the HRA states there is no LSE on these two sites. (4) Appropriate Assessment – Further assessment is required on Wealden Heaths Phase I SPA. Water Quality, FSM1 and 4 need to be included in any calculation for nutrient neutrality and include a nutrient neutrality management plan. Clearer details regarding all sites affected on whether mitigation will be achieved or offsite. Atmospheric pollution - this work will need to be carried out and should particularly address traffic impacts associated with new development and provide mitigation where applicable. Ammonia from traffic emissions should also be assessed. (5) Due to Bechstein Bats the HRA will need to include details of any likely significant effect on the Singleton & Cocking Tunnels SAC re sites in Rowlands Castle.

(RSPB) Concerned with lack of consistency in the approach taken for the protection of the suite of SPAs within a 5km buffer zone within the boundary of the district, namely the Wealden Heaths Phase I SPA. The HRA must be robust, up to date scientific knowledge and not based on assertion of the function of an undefined SAMM and/or SANG/WHIP provision. There should be no gaps in the assessment and must contain complete, precise and definitive conclusions. There is incomplete assessment of potential impact pathways, eg. Urbanisation effects (cats, fly tipping/garden encroachment, fire). SAMM in isolation is not sufficient to fully mitigate the impacts of recreational disturbance and there is no evidence provided to support a solely SAMM provision. No justification has been provided as to why smaller developments of 20 dwellings or fewer do not require mitigation or in-combination impacts within 5km. Also requires justification for WHIPs for dwellings 21 to 49 in 5km. Do not agree that Thursley, Ash, Pirbright & Chobham SAC is covered by mitigation for the TBH SPA. Alice Holt should not be a form of SANG for recreational impacts as it has not been created and managed as such.

Question: Supporting Evidence - EV4 What are your comments on the Emerging Infrastructure Plan?

No comments received on the consultation platform specifically in response to this question – many comments about Infrastructure in response to other questions.

Representations received on behalf of the Bloor Home welcomes the Emerging Structure Plan as part of the draft Plan's evidence base as it provides clarity with regard to contributions towards infrastructure enhancements and how the future infrastructure delivery will be secured.

Question: Supporting Evidence - EV5 What are your comments on the Accessibility Study?

Some comments were received supporting the accessibility study and its methodical approach.

However, a number of comments were received querying the accessibility scores output for some locations in the district as well as comments criticising or questioning the methodology the study employed.

The main comments regarding the scoring output of the accessibility study are:

- HCC query the above average accessibility score for HDN2. It is an area which would be reliant on the private car and have significant concerns regarding sustainability of this site and the lack of real opportunities to improve the site given the existing network and distances to infrastructure;
- South and East Liphook Residents raised comment in relation to LIP1 and LIP3. The accessibility study states that the sites score above average, but this is queried as the group believes the sites to actually score 4/8 and 5/8 respectively;
- The accessibility score for Holt Pound was expressed as "flawed", thus making the settlement hierarchy tiering also flawed;
- There is concern that the accessibility score for Land West of Lymington Bottom Road (LAA/MED026) and South Medstead (LAA/MED-027) has not been considered correctly or fairly, and should be reconsidered in light of existing service provision;
- Given the poor availability of services and facilities in proximity to the site, Land at Neatham Manor Farm appears to have received higher scoring than the methodological approach justifies;
- The scoring is thought to be inconsistent and should be reviewed. Land north of Cedar Stables should have scored higher with a score of 13; and
- Bramshott & Liphook Parish Council state that the scores are published but not the actual calculations involved in forming the scores.

The main comments regarding the methodology of the accessibility study are:

- Four Marks and Medstead Neighbourhood Plan Steering Group recommend that Option 2 is used for the methodology of the accessibility study, for the following reasons:
 - It provides a more transparent and simplified approach to accessibility study, whilst still reflecting the pattern of scoring of all three options;
 - The ATE core facilities are weighted higher than other facilities within each social function;
- The hexagons that are placed over settlements are not thought to be placed well or accurately as they are not all placed over the area of the settlement. For example Bentley's train station is not included in the hexagon array and Ropley has a SPB larger than a hexagon;

- The setting of hexagons at 500-metre centres within an urban context is crude and, when combined with the rudimentary placement of the hexagons, leads to statistically unreliable journey distances being calculated between the origins and destinations. A more fine-grain analysis is required, assuming 50- metre centres;
- The example hexagons – 10 and 15-minute Walking and Cycling Isochrones in Appendix D have incorrectly identified the centre of Four Marks, which skews the various isochrones in support of FMS1 and FMS4. The centre of the hexagon focuses incorrectly on a residential area of Churchill Close located approx. 400 m to the southwest of Four Marks villages main shops, amenities, and transport facilities;
- The accessibility study considers distance as the only consideration of accessibility, and fails to consider the ability to achieve safe and attractive connections to facilities;
- The study only appears to have an ‘as the crow flies’ approach to making assessments on achievable distances for walking and cycling. For instance, the gradient from Rowlands Castle Railway Station to Chalk Hill Road proposed site is about 240 ft (70M) upward and 36 ft (10.9M) downward using the B2149 (courtesy of Google Maps). The gradient using Rowlands Castle Road is about 253 ft (77M) upward and 49 ft (14.9M) downward. The cycle distance varies with the direction of travel due to the steep gradients on the route.
- The report doesn’t appear to have captured poor maintenance of roads, tight bends, and surface water flooding – all aspects that can make routes unviable / hazardous for cycling and walking. The study would benefit from local knowledge, and a proper consultation on viable routes to amenities. Local Parish Councils should be consulted on viable routes and the constraints that may be present;
- Carrying any viable load of shopping would be quite difficult on a bicycle. Walking and carrying a load of heavy shopping is also unrealistic;
- The accessibility study undertakes no consideration of facilities and services that can be provided or improved on site or nearby as a result of strategic development opportunities;
- The accessibility study has not taken full account of the availability of existing services within settlements. This is particularly the case with regards proposed sites at Four Marks & South Medstead, where the provision of a number of existing services (such as café and medical services), have not been accounted for in the site scoring;
- The accessibility study also does not treat opportunities and constraints for Active Travel and Public Transport equitably or fairly. Certain sites, in particular Land at Neatham Manor Farm (LAA/BIN-011), appear to have been treated positively in this regard. No detailed justification has been provided within the study as to why particular sites benefit from particular opportunities nor other sites subject to particular constraints;
- It is a bespoke assessment with inevitable subjective bias from the assessor(s);
- Given that there is no credible strategy in this local plan to address traffic congestion or the lack of public transport it difficult to perceive that any realistic assessment of the accessibility of these proposed sites has been carried out;
- The evidence within this study, (particularly the WSP study referred to on page 16), actually points to a 30 minute neighbourhood as being the most appropriate for East Hampshire.

- The methodology ignores the frequency of visits undertaken to each amenity type;
- The scoring is based on a range of land-uses that serve no amenity value in the way people conduct their day-to-day lives. For example, inclusion of Fire and Police Stations is not a destination for residents and should be excluded from the analysis as it may distort the results; and
- It does not include a balancing qualitative exercise which considers the attractiveness of services available in each settlement.

National Highways request that a meeting is arranged in order for us to discuss the proposed transport approach before any further work is undertaken.

It is noted that the accessibility study postdates (24 January 2024) the publication of the draft Local Plan for consultation (22 January 2024) and it is, therefore, questionable whether the proposed allocations are based on the most recent evidence.

Question: Supporting Evidence - EV6 What are your comments on the Viability Study?

One detailed comment received in relation to specialist housing (copied in to avoid losing meaning);

“Although we support the wording of policy H5 itself we have concern over some wording within para 9.78. Para 9.79 that confirms that the Council view sheltered and extra care housing fall into use class C3, however para 9.78 then confirms that Affordable housing provision will also be expected in relation to C3 uses in accordance with Policy H3. However, this provision may be in the form of supported housing, including extra-care housing for older and younger persons.

As in our response to policy H3, we noted that the East Hampshire Local Plan regulation 18 consultation is supported by a Local Plan Viability Assessment, Draft Report, January 2024 by Adams integra. However, this does not test specialist housing for older people as its own typology.

As such, we would like to remind the Council of the emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan (Paragraph: 002 Reference ID: 10-002-20190509).

Within any viability assessment the Council should acknowledge that the viability of specialist older persons housing is more finely balanced than general needs housing. We are strongly of the view that these housing typologies should be robustly assessed separately to mainstream housing. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG on viability which states that. A typology approach is a process plan makers can follow to ensure that they are creating realistic deliverable policies based on the type of sites that are likely to come forward for development over the plan period. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion

about policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need. As such the council should undertake a viability assessment to inform the plan and its policies and ensure the plan is deliverable.

The Council must therefore ensure that an up-to-date viability assessment is undertaken to inform the future plan. The new viability assessment must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing.

We would direct the Council towards the Retirement Housing Consortium paper entitled A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 (RHG Briefing Note) available from <https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf>. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods.

Recommendation

The Council must ensure that an up-to-date viability assessment is undertaken to inform the future plan. The new viability assessment must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing.”

Par 2.4 states that a proportion of affordable homes may be required to provide wheelchair accessible homes where there is evidence that this is needed locally. This approach is not unreasonable however the HBF would suggest that following where evidenced by local need the council insert “and is viable and feasible”. This would ensure that there is sufficient flexibility in the policy to take account of those situations where it is not viable, or it is physically impractical for such a home to be built to part M4(3). We note that the Council's viability study sets the cost of delivering a home to part M4(3) at £115 per sqm. However, the study also fails to recognise the difference between part M4(3)a and M4(3)b. The cost of delivering the later is significantly higher. As to how much the cost of these should be the HBF have seen similar studies which estimate the cost to be between £13,000 and £30,000 per dwelling depending on which standard is used.

Comments saying that particular sites are not viable, particularly Neatham Down.

The HBF has concerns that the Council have not tested the full costs arising from this local plan. In particular the cost of delivering net zero carbon homes is far too low and could in combination with the other policies in the plan make development unviable. The Council will

need to produce an updated viability assessment to fully consider the cost of delivering new homes under this local plan.

Question: Supporting Evidence - EV7 What are your comments on the Flood Risk Sequential and Exception Tests?

(EA) The sequential test should clearly show all sites being taken forward (eg. Highlight those sites allocated). The Exception Test – disagree with the conclusion for the allocation at Wilsom Road. The Exception Test needs to consider all sources of flood risk and whether there is sufficient space on site for built development and space to provide mitigation options. The Exception Test should consider climate change (it does not at present), need to consider the 1% annual probability flood with an allowance for climate change. SFRA – amend functional floodplain return period – 5% to 3.3% in line with the NPPG.

(HCC) Not clear how the sequential test findings have informed the site allocation selection. Several sites have sizeable areas of various sources of flooding (ALT6 Wilsom Road) and it is not clear from the sequential test that there were not alternative sites at a lower risk where these could be accommodated. The sustainability justification column has not been completed within the sequential test. This column should be used to indicate whether a site has been allocated and why a site has been chosen despite not wholly being in FZ1 with a low risk of flooding from all sources. The Level 2 SFRA (Exception Tests) does not show the land take for each of the sites assessed and therefore is not clear how the conclusions of acceptability within the Level 2 has been arrived at. The LLFA's Site Allocation SUDs Land Take Calculator can be used to access this.

(Alton TC) Neatham Manor Farm – the sequential test has not identified any reasonable alternatives.

(Individuals) The National Infrastructure Commission's report 'Reducing the risk of surface water flooding' should be used as part of the Exception Testing.

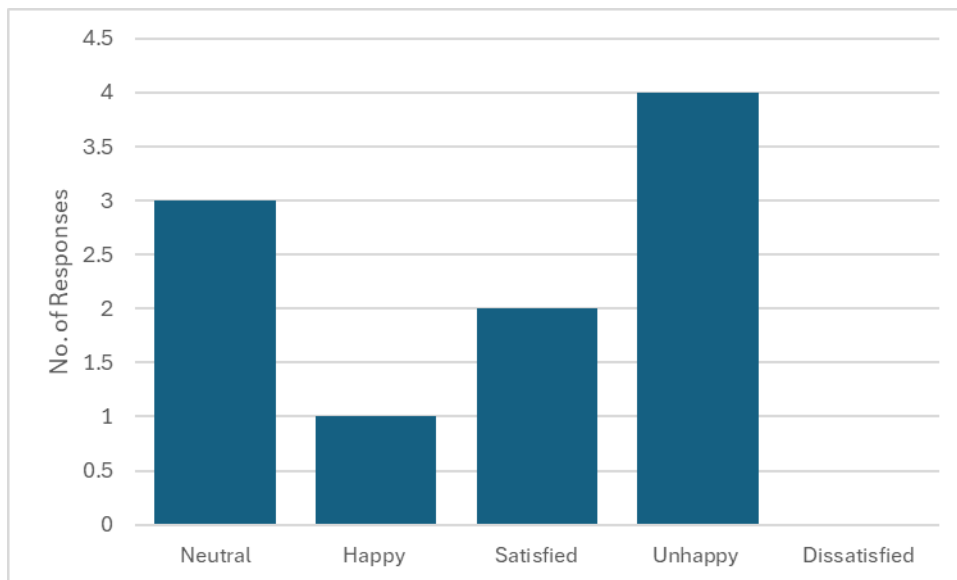
(Developers) The sequential test should look at all sources of flooding not just those in FZ2 & 3.

Question: Supporting Evidence - EV8 What are your comments on any other evidence base documents?

No comments received.

Background Papers

Question: B1 How do you feel about the background papers?



Question: B2 Housing Background Paper - What are your comments on this?

Havant Borough Council welcome the Housing Background Paper and consider that it is helpful in explaining and justifying the housing position.

Test Valley Borough Council supports the approach of the Housing Background Paper which sets out the position to potentially address unmet housing need in the Planning Area.

Medstead & Four Neighbourhood Plan Steering Group consider that the quantum of housing for the District outside the SDNP is overstated.

A comment that the housing figure in an LPA as derived from the Standard Method is no longer a compulsory figure, this change should be reflected in this section.

Question: B3 Revised Settlement Hierarchy Background Paper - What are your comments on this?

Binsted Parish Council has raised concern that the settlement of Holt Pound stands out as being much smaller than any of the other Tier 3 settlements. Concern has also been raised that there is insufficient evidence for the proposed distribution of development across the Settlement Hierarchy.

Four Marks Parish Council considers that there appears to be an unfair and disproportionate allocation of housing within the tier system.

Medstead & Four Neighbourhood Plan Steering Group accepts the scientific research to the Settlement Hierarchy Methodology. They further note that the background paper does not define or classify the tiers as service centre, urban centres and therefore consider that the Tier calculation is incomplete. Concern is also raised regarding the use of settlement population to move certain settlements either up or down the Tiers. For these reasons, they consider that Four Marks/South Medstead should remain in Tier 4 to reflect the true character of the settlement. By promoting it in the hierarchy EHDC is indicating to developers that it is suitable for the siting of considerably more houses, which will exacerbate the existing accessibility issues and increases car usage.

Medstead Parish Council strongly objects to the allocation of Four Marks/South Medstead as a Tier 3 settlement and considers the use of population to manipulate the Tier system, unacceptable.

Headley Parish Council consider the tiering scores based on the 2018 Settlement Hierarchy Background Paper for Headley, Headley and Arford to be out of date and inaccurate.

Question: B4 Gaps between Settlements - What are your comments on this?

Whilst the methodology is set out in the Draft Local Plan 2021-2040 (Regulation 18) Gaps between Settlements Background Paper January 2024 there is no evidence to show how the methodology has been applied to some sites. The Council has not been transparent over the assessment process and there is little information provided as to how the Council assessed the site and why the boundaries are drawn as shown. This information should be provided.

(M&FM Plan) supports the expansion of the Medstead & Four Marks Neighbourhood Plan Local Gap, therefore paper should include any gaps defined in Neighbourhood Development Plans.

(Kingsley PC) more needs to be done to protect and enforce non development of the gaps.

(Individual) The proposed allocations at Drift Road, Five Heads Road and Chalk Hill Road would encroach onto the local gap. If gaps to be reviewed they are not taking account of the criteria used to designate them.

(Individual) support the aspirations of the background paper.

(Individual) Methodology suggests the precise boundaries of the gaps have been identified and form part of the Local Plan. But where and what are they?

(Individual) The local plan should protect the strategic gap between Wivelrod and Jennie Green Lane Medstead, the lane provides a quiet place to ride with wonderful views across the countryside that need to be protected for future generations.

(Developer) The gap designation does not preclude development provided the criteria is met. Most development can be designed to maintain the perceived gaps and visual separation, specifically between Clanfield and Catherington.

(Developer) Gaps risk becoming too much of a restriction to development.

(Developer) Object to the Lindford gap. It conflicts with the Local Plans identification of the settlement as a sustainable location for growth by significantly constraining opportunities for the future expansion of the settlement.

(Developer) The current proposal for extending the local gap in the Land South of Five Heads Road and The Land North of Chalk Hill Road do not appear to comply with the very criteria that is set out in Gaps between Settlements.

The Gap criteria item c) states the boundary of a gap should consider the existing vegetation and land uses (gardens, footpaths, hedgerows, streams, field boundaries, woodlands and backs of houses). These act as a robust edge to a gap (act as visual screen to housing). However, in many cases the boundaries should, where possible, align to the Settlement Policy Boundaries (SPB). The Land South of Five Heads Road and the Land North of Chalk Hill Road do not appear to meet these criteria.

Question: B5 Settlement Policy Boundary Review - What are your comments on this?

In regard to the Settlement Policy Boundary Review Background Paper, there was considerable support for the majority of the proposed amendments, which were considered logical and fully justified. However, there were a number of objection to SPB changes that included proposed site allocations. In particular, many people considered these changes should only be implemented upon adoption of the Local Plan and should omit any associated open space on the periphery of the site.

In contrast, many site promoters support the inclusion of proposed allocations within the SPB. There were also a number of omission sites that promoters considered should be allocated and thus included within the SPB.

One comment received refers to page 40 of the Interim Settlement Policy boundary review where 6B and 6C Tarbery Crescent (item 11) are mentioned. The comment suggests that there are no such properties in Tarbery Crescent and perhaps it should refer to Highcroft Lane?

Medstead & Four Neighbourhood Plan Steering Group note the detailed work and input from the Planning Team. However, concern is raised with regard to some of the conclusions within the paper and it is suggested that a meeting is arranged to discuss the proposals.

Four Marks Parish Council and Medstead Parish have raised concerns regarding some of the proposed changes to the Settlement Policy Boundary.

Question: B6 Transport Background Paper - What are your comments on this?

In general, there was support for the document.

It was commented that the Transport Background Paper failed to point out a key point, that the A-Road and the Rail network in East Hampshire fail to link up the main settlements in the district, as they are both based on "London Radials". The A31 and A3 both cut across the district (linking only in Guildford), and the two rail lines similarly. Routes perpendicular to

these radials (B3004, B3006, A325 and A32/A272) are poor (narrow, twisty, busy and dangerous for pedestrians and cyclists) on the road network and non-existent on the rail network. This constraint would benefit from being acknowledged and explored in the Background Paper, rather than just the comments at 4.6 and the visual effect in Fig 4.1.

It was also commented that the point in para 7.2/7.3 regarding the safety on the B road network, with narrow lanes with pedestrians/cyclists, is key.

On page 16 (Section 4.10) it states that there are two train services an hour during peak hours from Rowlands Castle. It was commented that this exaggerated the reality. In the evening however, there are only two services from London namely 1623 and 1654, which leave London Waterloo at 1445 and 1530. These two services cannot realistically be considered evening peak, therefore it should be concluded that there is one train an hour from London during evening peak hours. Therefore, Petersfield is the only realistic train station option for northbound travellers using public transport. In conjunction, the last bus southbound bus service is the 1840 which would serve the 1700 service from Waterloo. Therefore, anyone leaving London after 1700, would not be able to reach Horndean by public transport. Cycling from Horndean to Petersfield is not a realistic option for people going to work, so yet again, car journeys are the only realistic alternative. The above is a realistic appraisal of how poor public transport connections are for Horndean and Catherington.

Agreement was shared that any new transport infrastructure should be designed with walking and cycling as a priority and that any new developments should have the benefit of "sustainable public transport". However, it was uncertain how this would actually be achieved as public transport varies greatly over the district, thus it is thought likely that many will still travel by car to work and the shops.

Support was expressed for the inclusion of existing traffic "hotspots" in the document. Agree that these "hotspots" will be exacerbated by future development, specifically in Alton. Four Marks and Medstead Neighbourhood Plan Steering Group would like to see the impacts of pollution in conjunction with the congestion plots presented in the document.

A comment stated that there is a significant hazard at the One-Stop shop on Five Heads Road, where there is a blind bend coupled with a road width that is too narrow for two cars to pass without slowing to a crawl. A pedestrian accident has occurred in the last year months and with the schools both sides of this hazard, there is a serious and highly probable risk that a further accident could occur at this bend. Additional development traffic will increase this probability.

Comment was made that the full picture of road traffic incidents was not included in the document as the data source only includes public roads, not private.

Comment was made to challenge the assumption that local daily needs could be met from within the new allocated development as the variety of services required will not be provided.

One comment received in relation to the vehicle parking standards suggests that there appears to be an acceptance that residents in East Hampshire will drive and own vehicles with the only mitigation proposed being electric vehicles. It is suggested that the parking

standards should include thresholds for car club vehicles and require consideration of this provision at all sites.

Additionally, residential cycle parking standards should enable all residents of a property to securely store a bicycle as well as provide provision for charging e-bikes (+ scooters, if these become legislated in the future).

The impact on existing users of amenities needs to be considered. For example, Catherington Lith is a common walking route for locals. With proposed developments, there is a likelihood that instead it will become frequented by teenagers, and become less attractive for walkers, due to the risk of encountering unsocial behaviour.

No consideration for delivery driver parking has been allowed for. As has been seen from the recent planning application for the Land South of Five Heads Road, current parking restrictions would mean that delivery drivers bringing shopping or larger items would need to park in a manner that would block the highway.

The starting point for development should be location and accessibility to facilitate low/car-free living. I would welcome greater emphasis on providing car parking levels lower than the minimum standards alongside contributions to appropriate sustainable transport infrastructure and parking management to seek to change vehicle ownership and behaviour patterns in the district.

Criticism was received that the Transport Background Paper was not published at the start of the consultation.

Surrey County Council noted that the transport background paper sets out that East Hampshire District Council will undertake a detailed assessment of the transport implications of future development to support its Pre-submission (Regulation 19) Local Plan. SCC await this supporting evidence to assess cumulative impacts on the highway network to determine if there is any material impact on their network. In particular, they expect traffic impacts along A31 corridor from the SCC boundary to the eastern side of Farnham should be assessed and considered.

National Highways are happy to engage collaboratively with EHDC to ensure the Council's transport evidence provides a robust and proportionate assessment of the impacts of the emerging development strategy in the Local Plan on the SRN.

Question: B7 Gypsy and Traveller, Travelling Showpeople Accommodation - What are your comments on this?

Only one comment received, which said in general agreement.

Comments received from Medstead & Four Neighbourhood Plan Steering Group are neutral in respect of the meeting the accommodation needs of the Gypsy and Traveller, Travelling Showpeople.

Question: B8 Please provide any further comments on Background Papers

A mix of comments received – one querying where the transport paper and strategic modelling is to support the draft Local Plan.

Some comments saying it was hard to navigate the documentation.

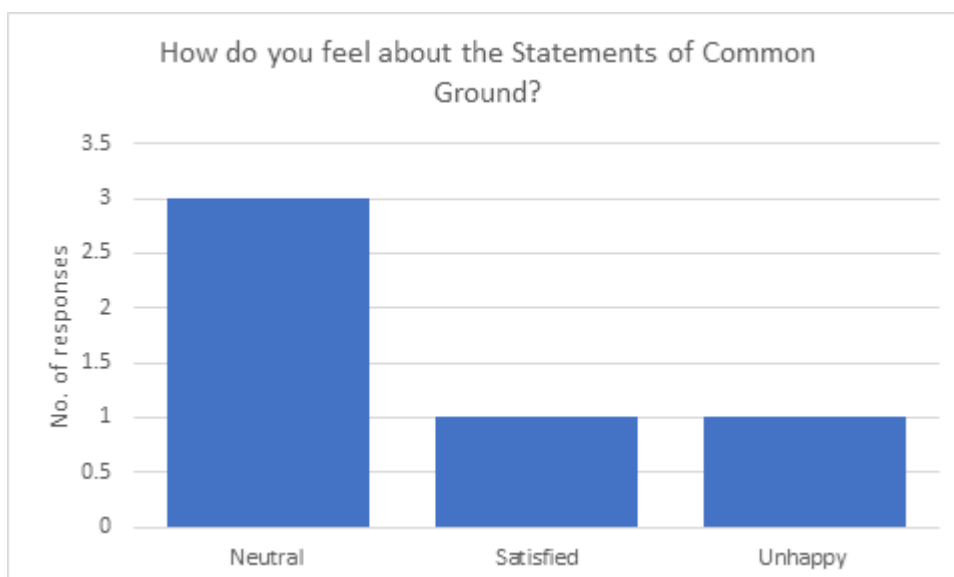
Comment relating back to national political statements about house building, and avoiding greenfield sites.

Some specific comments about Bentworth;

- Bentworth is a Tier 5 settlement, it does not meet the environmental or transport objectives as set out in these documents. It is the only Tier 5 settlement to have sites allocated and this does not feel appropriate or in line with the background documents.
- The site allocations do not seem to have taken into account key objectives as set out in these background documents. As a Tier 5 settlement, it does not meet the environmental or transport objectives as set out in these documents. It is the only Tier 5 settlement to have sites allocated and this does not feel appropriate or in line with the background documents.
- BWH2 There are no shops in Bentworth to provide facilities within walking distance.

Statements of Common Ground (SOCG)

Question: Statements of Common Ground - SOCG1 How do you feel about the Statements of Common Ground?



Question: SOCG2 What are your comments on the Duty to Co-operate and Statements of Common Ground?

A small number of comments received. One questioning who takes responsibility for successfully achieving and building this into an ongoing framework and reporting back to the Local Community.

A couple of comments about ensuring there is funding available to achieve aspirations, and a general comment about a need for more green space as countryside is built on, and there is a loss to with a detrimental impact on the beauty of the area.

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. However, they note that there are a number of authorities who border East Hampshire who have not prepared Statement of Common Ground to clarify their position including Havant Borough Council.

Other Feedback or Comments

Question: OF1 Is there anything else you would like to tell us about this consultation?

A few positive comments, saying the consultation document was of a high quality, with informative materials, and that a lot of work had clearly gone into it. Comment thanking staff for their hard work and professionalism at the consultation event at Alton.

Comments made about the Local Plan generally; cavalier, irresponsible, too much to read, too big, summary document too small, specific site allocations should include a picture rather than just a drawing which itself is not helpful, use of deliberately misleading words like 'desirable', 'sustainable', the majority of sites proposed do not align with the policies.

Comments about the consultation process; obtuse, convoluted, difficult to navigate, unusable, cumbersome, only one consultation event in Horndean which was crowded and hard to speak to anyone so busy talking to others, unwieldy, too much material on Common Place, not user friendly. A lot of comments relating to when the system was temporary down, and seeking an extension of the consultation.

With regards to the distribution of new development, comments saying it should be more evenly spread. Comments noting cumulative impact in areas, particularly Clanfield, Horndean and Catherington. Too much in certain areas – comments about the amount in Rowlands Castle. Housing should be considered where vacant land has been lying in waste.

With regards to the housing number, calls to stop over development of areas, because the housing number is too high. Also that the scope of the plan is too constrained by the way in which it is dictated by Government – this should change. The Council should listen to local people more.

With regards to the type of housing, need more social and affordable housing, not more age restricted retirement housing.

Need to focus on brownfield redevelopment

In relation to specific locations; Whitehill & Bordon is proposed to take 667 out of the 3440 total, which is 19.4%. This is a fair number when looked at in this overall context and support the local plan allocations across the district.

The new Whitehill and Bordon Town Centre development is happening in its current location because that is where the MOD land became available. However, having a shopping area in the original Town Centre area of Bordon is extremely important in serving residents in this part of town. Support regenerating the Forest Centre offering and ensuring shops remain open in that part of Bordon.

The Chase Hospital could be converted to a fantastic medical hub at a fraction of the cost of the new health hub.

Alton, there is unhappiness and disbelief amongst residents who no longer believe council has residents best interests at heart. Objections to Tier 1 classification of Alton. Alton is at risk of coalescence. It is a shame that residents were not offered a holistic view of the local plan together with the Alton neighbourhood plan so feedback reflects the whole story, not half of it.

Quite a few responses comment on the South Downs National Park, saying the Council should lobby the Government more about the impact of the SDNP on housing numbers for East Hampshire. Also saying that new housing is needed in the SNDP, as well as outside it to house people where they work and recreate, to avoid long commutes by car from nearby settlements where housing is more affordable. The countryside around Alton is just as deserving of protection as that 1 mile away in the South Downs National Park

Many comments about infrastructure, saying East Hampshire and specific settlements cannot sustain more housing without significant investment in infrastructure. Query how infrastructure provision has been assessed, with much concern expressed about the lack of information about infrastructure. Many comments saying more facilities are needed, especially doctors and dentists, and questioning how this has been considered. It is great to have an objective of vibrant communities, but you do not create those without mandating the infrastructure that needs to go with them.

With regards to the Liphook development sites, each plan statement for these refers to a non-specific CIL obligation on each site / each future developer, but there is no specific local plan proposal for how such monies will be invested to mitigate the obvious increased traffic on the key roads in and out of Liphook centre and the centre itself.

A specific comment about places of worship - it appears to be entirely silent as to the provision of, or even reference to, the moral or spiritual needs of the many local communities within East Hants - which is essential to their well-being of society. Whilst it is appreciated that places of worship are perhaps ideally located within a designated urban area, this isn't always practical as putting them in conflict with employment and housing which are more financially remunerative. In practice it has been proven in many places that such can be ideally located outside of and perhaps on the periphery of the urban development area. It is

therefore important that a Statement is included noting any such need will be favourably considered as an "exception to policy".

A specific comment about the Settlement Policy Boundary, which says, on page 40 of the Interim Settlement Policy boundary review there is mention of 6B and 6C Tarbery Crescent (item 11). There are no such properties in Tarbery Crescent. Perhaps you mean Highcroft Lane?

And also some specific comments about Vehicle Parking Standards; there appears to be an acceptance that residents in East Hampshire will drive and own vehicles with the only mitigation proposed being electric vehicles; urge that the parking standards to include thresholds for car club vehicles and require consideration of this provision at all sites; residential cycle parking standards should enable all residents of a property to securely store a bicycle as well as provide provision for charging e-bikes (+ scooters, if these become legislated in the future); the starting point for development should be location and accessibility to facilitate low/car-free living. Welcome greater emphasis on providing car parking levels lower than the minimum standards alongside contributions to appropriate sustainable transport infrastructure and parking management to seek to change vehicle ownership and behaviour patterns in the district.

A comment on sustainability, saying the plan seems to be very keen on green actions when it involves making other people spend money but the green ambition seems to disappear when it involves the Council spending money or working with other agencies to ensure the right facilities are put in place.

With regards to the environment, comments expressing concern about the destruction of farmland and natural habitats. Concern about the loss of countryside, and greenfield land. Comments made about Green Belt (note EHDC is not a Green Belt authority). A suggestion that swift bricks should be a mandatory inclusion.

With regards to flood risk, on page 422 of the sites (Chapter 12), it is stated that Four Marks does not suffer from Fluvial or groundwater flooding. But it omits entirely any mention of serious surface water flooding, which there undoubtedly is. The entire plan needs a surface water map, like it has for fluvial and ground water. Four Marks is at particular risk. Ensure a surface flooding risk map for East Hampshire is included in the DLP.

Some comments were submitted specifically about sites:

- Draw attention to the number of objections already made to the planning application at Chiltley Farm, and question why this site keeps getting put in the plan.
- CFD1 – the description, constraints and opportunities has not considered the following: wildlife, education, or infrastructure. Loss of the gap, and adverse impacts on heritage.
- Many comments about RLC & RLC2, as per the site summary, and general objections to development proposals in Rowlands Castle referring infrastructure concerns.
- A comment in support of Chawton Park Farm site, saying it is preferable to others.
- Comments made in support of Neatham Down, over Holybourne and Windmill Hill

Petition

During this consultation, a petition relating to site ALT8 was submitted.

Submission letter - <https://www.easthants.gov.uk/media/8968/download?inline>

Online petition - <https://www.change.org/p/save-neatham-down-say-no-to-the-continuing-overdevelopment-of-alton>

Omission Sites

Representations were made on sites that were not proposed for allocation in the Local Plan, promoting them for development, and/or commenting on the Settlement Policy Boundary in relation to land/sites. These are termed 'omission sites'.

Representations were made on the following sites (LAA references);

MED-034 - Bell Cornwell regarding Casalinda in Medstead

MED-037 - Gillings Planning on behalf of Cavendish and Gloucester Limited The Dell, Homestead Lane, Medstead

BIN-013 - Bell Cornwell on behalf of Glen Cottage, Fullers Road Rowledge

BEN-022 – BVA Planning on behalf of Forays Homes

HD-044 – Landowner of land adjacent to Glamorgan Road and White Dirt Lane, Horndean

KIN-013 - Mat Plan in relation to the SPB in Kingsley

HD-049 - Robert Tutton Town Planning Consultants Ltd on behalf of Hook Cottage in Pattersons Lane

HD-043 – Savills on behalf of Grainger Plc regarding Land to the North of Woodcroft Farm

HD-048 - SLR Consulting Ltd on behalf of Fastnet Properties regarding Settlement Policy Boundary

AL-083 – Beech Parish Council representation [East Hampshire parish and town councils](#)

To view the representations for these sites, see published responses, <https://www.easthants.gov.uk/planning-services/planning-policy/local-plan/emerging-local-plan/evidence-base/responses-local-plan>, and [Industry professional - contents](#).