

Sustainability Appraisal (SA) of the emerging East Hampshire Local Plan

Interim SA Report

December 2018

Quality information

Prepared by	Checked by	Verified by	Approved by
Chris McNulty, Environmental Planner	Mark Fessey, Associate	Mark Fessey, Associate	Steve Smith, Technical Director
Mark Fessey, Associate,	Kevin Thurlow, East Hants DC		
Kevin Thurlow, East Hants DC			

Prepared for:

East Hampshire District Council

Prepared by:

AECOM Infrastructure & Environment UK Limited Aldgate Tower 2 Leman Street London E1 8FA United Kingdom aecom.com

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East Hampshire Local Plan SA Interim SA Report

1. Introduction

Background

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging East Hampshire Local Plan.

- 1.2 Once in place, the Local Plan will establish a spatial strategy for growth and change for the period to 2036, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined. The plan is for that part of East Hampshire that falls outside of the South Downs National Park. Figure 1.1 shows the plan area.
- SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA. 1

SA explained

- 1.4 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.
- 1.5 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- More specifically, the SA Report must answer the following three questions -
 - What has Plan-making / SA involved up to this point?
 - including with regards to consideration of 'reasonable alternatives'
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are <u>next steps</u>?

This Interim SA Report²

At the current stage of plan-making the Council is consulting on an early draft plan, under Regulation 18 of the Local Planning Regulations. This 'Interim' SA Report is therefore produced with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the local plan.

Structure of this report

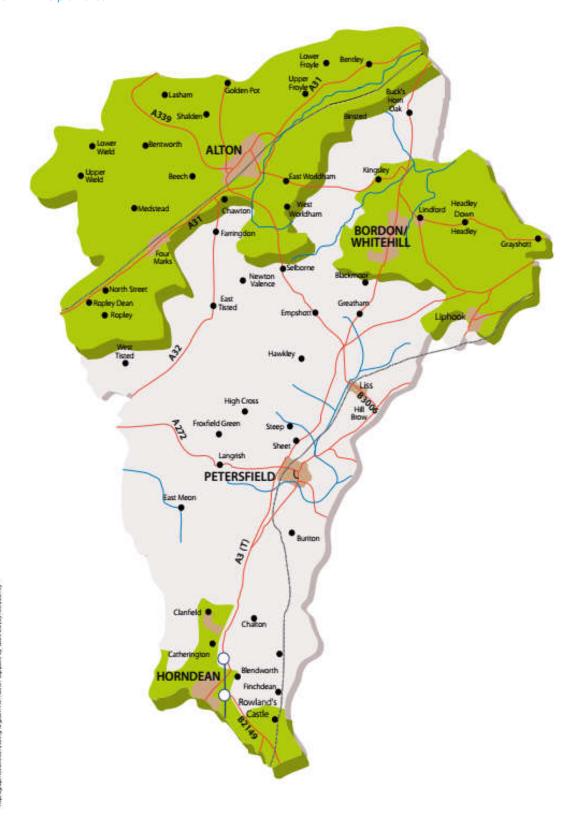
- 1.8 Despite the fact that this is an 'Interim' SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the three questions above.
- 1.9 Before answering the first questions, there is a need to further set the scene, by answering two initial questions: What is the plan seeking to achieve?; and What is the scope of the SA?

Introduction **AECOM**

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

Figure 1.1: The plan area



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2. What is the plan seeking to achieve?

Introduction

The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

Legislative policy and context

- 2.2 The plan is being prepared under the Town and Country (Local Planning) Regulations 2012, mindful of the underpinning primary legislation. It must reflect current government policy as set out in the revised National Planning Policy Framework (NPPF, 2018) and Planning Policy for Traveller Sites (2015), and must also be prepared mindful of Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed development needs (OAHN), otherwise known as local housing needs (LHN), as far as is consistent with sustainable development.
- 2.3 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic growth aspirations of the Enterprise M3 Local Enterprise Partnership (LEP), and Hampshire County Council (ECC) strategy - e.g. in relation to transport, minerals and education. East Hampshire DC must also cooperate with neighbouring areas, including the South Downs National Park (SDNP) Authority, authorities within Surrey to the north east and West Sussex to the east, and the south coast authorities that have come together to cooperate under the umbrella of Partnership for Urban South Hampshire (PUSH).
- 2.4 Finally, it is important to note that the plan will be prepared mindful of 'made' (Alton, Medstead and Four Marks, and Bentley) and emerging (Bramshott and Liphook, Ropley, Rowlands Castle, Bentworth, Beech) Neighbourhood Plans. Neighbourhood Plans must be in general conformity with the Local Plan, which means that current Neighbourhood Plans may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made Neighbourhood Plans will be a consideration when preparing the Local Plan.

Vision and objectives

2.5 The draft vision of the Local Plan is set out below:

> "By 2036 our communities' sense of place will have been maintained and reinforced, respecting their unique individual needs. We will have provided a good quality home to meet the differing needs of all our residents, a successful and growing local economy and achieved environmental excellence."

- 2.6 The draft objectives of the Local Plan are grouped under the following three core headings:
 - Core Objective A Provide sustainable levels of growth in the LPA area.
 - Core Objective B Provide well-designed new developments that are in the right location and adaptable to climate change.
 - Core Objective C Enable infrastructure in the LPA area to improve and support growth.
- A number of more specific objectives are identified under these headings (see the Local Plan document).

What is the Plan not seeking to achieve?

- 2.8 Firstly, there is a need to reiterate that the Local Plan will not be dealing with planning issues that are internal to the SDNP area of East Hampshire. It is important to bear in mind that the SDNP Authority is preparing a separate local plan for the National Park area.
- 2.9 Secondly, there is a need to be clear that the Local Plan will be strategic in nature, and hence naturally omit consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, namely at the planning application stage.

Introduction **AECOM**

3. What is the scope of the SA?

Introduction

The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of appraisal work. **Appendix II** presents further information.

Consultation on the scope

3.2 The Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ As such, these authorities were consulted on the SA scope in June 2018.

Key issues and objectives

3.3 Table 3.1 presents the sustainability issues/objectives (henceforth 'objectives') established through SA scoping. Objectives are grouped under 'topics'. Taken together, these sustainability topics and objectives provide a methodological 'framework' for appraisal.

Table 3.1: The SA framework

Topic	SA objectives
Biodiversity	 Protect and enhance local, national and international nature conservation interests Increase habitat connectivity and support improvements in biodiversity Contribute towards the maintenance and enhancement of green infrastructure
Climate change adaptation	 Respect the potential impacts of climate change in the location, design and layout of new development Avoid or reduce the risk of flooding for the District's population
Climate change mitigation	 Support reductions in greenhouse gas emissions, including through the use of sustainable forms of transport, particularly in rural areas Reduce the need to travel by car and shorten the length and duration of journeys
Community and wellbeing	 Help to meet the changing needs of an ageing and growing population Support improvements to the health and well-being of the population Improve accessibility to facilities and services, and to green infrastructure, particularly in rural areas
Economy and employment	 Improve accessibility to local employment and training opportunities especially in higher value-added activities⁴ Ensure a range of good quality employment sites are available to suit the needs of the District's businesses
Heritage	 Protect and enhance the significance and special interest of heritage assets and cultural heritage of East Hampshire and their contribution to local character. Promote understanding, appreciation and care of, and access to, heritage assets.
Housing	Ensure residents have the opportunity to live in homes that meet their needs, including for affordable housing
Landscape and townscape	Maintain and enhance the character of the District's rural landscapes and its settlements
Resources	Support an efficient and sustainable use of the District's resources
Water	Support sustainable water management and water quality enhancements in East Hampshire

³ In-line with Article 6(3) of the SEA Directive, these bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

Introduction

⁴ Such commercial activities include those associated with digital media, business services and the creative industries sectors, according to the Enterprise M3 LEP's Strategic Economic Plan (2018)

Part 1: What has plan-making / SA involved up to this stage?

4. Introduction to Part 1

Introduction

4.1 The aim here is to provide an overview of the information provided within this part of the report, i.e. provided in order to answer the question: What has plan-making / SA involved up to this stage?

Overview

4.2 Plan-making / SA has been underway for a number of months, with work to date focused on exploring "reasonable alternatives". More specifically, this part of the report presents information regarding the consideration of reasonable alternative approaches to housing growth, or 'spatial strategy alternatives'. It is clear that allocating land for housing is a central plan objective (see Chapter 3).6

What about other land uses and other plan issues?

- 4.3 The reference within the SEA Regulations to considering "the plan and alternatives..." suggests a desire to define alternatives that vary in respect of the full breadth of issues covered by the plan, which extends well beyond the issue of providing for housing needs. It is important to bear in mind the importance of 'place-shaping', an objective that goes beyond providing for housing needs, noting the following finding of the recent Raynsford Review of Planning in England (2018):
 - "The system has narrowed in scope and capacity and is no longer regarded as a key public policy instrument on wellbeing or climate change, etc."
- 4.4 However, it is necessary to limit the number of factors that are a 'variable' across the spatial strategy alternatives. Any attempt to vary the alternatives in terms of too many factors would lead to innumerable potential permutations, and hence the task of selecting a discrete list of alternatives that are demonstrably reasonable would become insurmountable. There is a pragmatic need for the alternatives to be 'spatial' (i.e. with thematic policy held constant) and 'housing-led'.
- 4.5 A final possibility involves considering alternatives in relation to other specific issues beyond housing, e.g. employment needs, specialist accommodation needs, District-wide thematic policy issues and site specific policy. In practice, the Council (working with AECOM) was mindful of the possibility of considering alternatives in relation to 'other issues', but did not identify any issues warranting this level of analysis. There are no other issues associated with a clear strategic choice, i.e. a choice where there is the potential to differentiate alternatives in respect 'significant effects'.⁷
- 4.6 If there were to be one further issue warranting particular attention it is the matter of providing for the accommodation needs of **Gypsies**, **Travellers and Travelling Showpeople**; however, on balance it was determined that there is no clear policy choice. At the current time, the evidence suggests that the needs exceed the capacity that exists, such that all sites that are deliverable and free from 'showstopper' suitability constraints should be identified as potential allocations.⁸ It would not be a useful exercise to examine options involving providing for additional accommodation needs at sites that have been found to be undeliverable or subject to a 'showstopper' constraint. It may be that a strategic choice emerges subsequent to the current consultation, e.g. involving providing for additional needs at any new sites that emerge, or at one or more of the 'bricks and mortar housing' led sites proposed for allocation.

⁵ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'. The aim is to inform the consultation, and subsequent plan finalisation.

⁶ Regulation 12(2) requires a focus on alternatives that are *"reasonable… taking into account the objectives… of the plan*".

⁷ There is also a need to bear in mind the interdependencies between policy issues, such that it can be a challenge to consider alternatives for one issue without knowing the preferred option in relation to another.

⁸ Further information is provided in the Council's 'Meeting the Accommodation Needs of Gypsies, Travellers and Travelling Showpeople' Background Paper (available at: http://www.easthants.gov.uk/evidence-base).

What about site options?

4.7 It is reasonable to focus on spatial strategy alternatives, between which there is a mutually exclusive choice, more so than on numerous site options, that might feasibly be allocated in myriad combinations, only some of which would be in accordance with strategic objectives. This approach reflects the legal requirement to focus on alternatives that are "reasonable... taking into account the objectives... of the plan" (Regulation 12(2)), recalling that a central objective (if not the central objective) of the plan is to allocate a combination of sites to meet needs. It also reflects a desire to support structured discussion of complex issues:

"Planning... operates in a democratic framework to achieve outcomes in the wider public interest in ways which ensure that the public have a say in the decisions that affect them. It is in every way a people-centred activity which involves the messy job of mediating change in complex environments."

Raynsford Review of Planning in England ("Planning 2020"; November 2018)

4.8 However, it is naturally the case that there is a need to examine site options as part of the process of arriving at reasonable spatial strategy alternatives. As such, site options are discussed in Chapter 5 ("Selecting the reasonable alternatives").

Whose responsibility?

4.9 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (i.e. EHDC), with AECOM acting in an advisory capacity; appraising the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Structure of this part of the report

4.10 This part of the report is structured as follows:

Chapter 5: explains the reasons for selecting the alternatives dealt with

Chapter 6: presents an **appraisal** of the reasonable alternatives

Chapter 7: explains reasons for selecting the preferred option

Commenting on this part of the report

- 4.11 Comments are welcomed on:
 - the decision to focus on 'spatial strategy' alternatives (Chapter 4);
 - the reasonable spatial alternatives selected, with reference to the selection process (Chapter 5);
 - the appraisal of the reasonable alternatives (Chapter 6); and
 - the Council's reasons for supporting the preferred option (Chapter 7).
- 4.12 Comments on individual sites should ideally be accompanied by an explanation of how the site in question should be delivered in combination with other sites (e.g. "in addition to sites X, Y and Z"; or "in place of site X"), in order to deliver-on strategic objectives; however, all comments received will be taken into account when refining the reasonable spatial strategy alternatives subsequent to the current consultation.

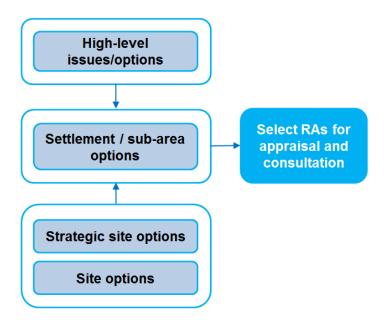
5. Selecting the reasonable alternatives

Introduction

5.1 The aim here is to discuss the step-wise process that led to the selection of reasonable spatial strategy alternatives for appraisal and consultation. The process is summarised in **Figure 5.1**.

5.2 Ultimately, the aim of this chapter is to present "an outline of the reasons for selecting the reasonable alternatives dealt with" in accordance with the Regulations (Schedule 2(8)).

Figure 5.1 Establishing reasonable spatial strategy alternatives



Structure of this chapter

5.3 This chapter firstly discusses the 'top-down' consideration of high-level issues and the 'bottom-up' consideration of site options - both strategic and non-strategic - before going on to explain how this understanding was drawn-upon to identify options for individual sub-areas and settlements and then, in turn, District-wide spatial strategy alternatives.

A note on evidence

- 5.4 Evidence is referenced and discussed throughout this chapter; however, at the outset it is important to explain that the process of arriving at reasonable alternatives was informed by a series of workshops, held across summer 2018:
 - A first set of technical workshops involved officers from EHDC and their specialist consultants, Hampshire County Council, the South Downs National Park Authority and a range of other stakeholders (from groups such as the Environment Agency, Historic England, Thames Water and Portsmouth Water).
 - A second set of workshops then sought to capture local knowledge from EHDC councillors, neighbourhood planning groups and parish councillors.
- 5.5 Workshop outcomes are referenced throughout this chapter, and meeting notes from the first set of technical workshops are available within **Appendix III**.

High-level issues and options

5.6 The first step in the process of seeking to establish reasonable spatial strategy alternatives involved the consideration of high-level issues and options in relation to the questions of:

- Quantum how many new homes must the East Hampshire Local Plan provide for?
- Distribution which broad areas within the District are more suited and less suited to growth?



Image of Bentworth, East Hampshire

Part 1

Quantum

Housing need

5.7 A central tenet of plan-making process is the need to A) objectively establish housing needs; and then B) develop a policy response to those needs, which will usually mean planning for the total needs, but which under certain circumstances may mean providing for a quantum of homes above or below needs. This principle is reflected the revised NPPF (2018) at paragraph 11, which states:

"plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change... strategic policies should, as a minimum, provide for **objectively assessed needs** for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole." [emphasis added]

- 5.8 The NPPF uses the term objectively assessed need(s) interchangeably with local housing need(s), with para 60 stating: "strategic policies should be informed by a local housing need assessment, conducted using the **standard method**... unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."
- 5.9 An 'indicative' standard method was first published for consultation in September 2017 and at the current time remains largely unchanged. However, the situation is not quite so clear-cut in respect of the data that should be utilised as an *input to* the method.
- 5.10 Current guidance is clear that the most recent data available should be utilised, which in practice means the most recent Government household projections, and the most recent data of local affordability (i.e. the ratio of house prices to income). The most recent household projection data is that published in September 2018, which is 2016-based; whilst the latest housing affordability data is from 2017. However, at the time of writing, the Government is consulting on a proposal to revert to using the 2014-based household projections data (in the short-term, i.e. until new 2018-based projections are issued). This is on the basis that the 2016-based projections are thought to be unduly low.
- 5.11 For purposes of the current Regulation 18 consultation for the East Hampshire Local Plan, it is appropriate to use the 2014-based household projections (along with the 2017 housing affordability data). Using this data, the standard method shows a need figure for all of East Hampshire of 11,556 dwellings, which equates to approximately 608 dpa (in the 19-year period from 2017 to 2036). However, this figure includes the needs of part of the South Downs National Park Authority planning area that falls within East Hampshire, but which falls outside the scope of the East Hampshire Local Plan, i.e. it is not the role of the Local Plan to provide for housing needs within the National Park (except as an outcome from "duty to cooperate" discussions with the National Park Authority, see discussion below).
- 5.12 A 2017 study identified objectively assessed housing need within the East Hampshire part of the National Park to be 112 dpa, which can be subtracted from the 608 dpa figure to arrive at a figure of **496** dpa as the Local Housing Need (LHN) / Objectively Assessed Housing Need (OAHN) for the East Hampshire Local Plan. It is recognised that this calculation is simplistic, in the absence of a detailed and fully up-to-date study to determine precisely what proportion of the 608 dpa figure should be apportioned to the National Park versus the Local Plan area; however, it reflects best available data at the current time.

Higher/lower growth?

- 5.13 As discussed, LHN/OAHN is only a starting point for plan-making, and in this instance the figure identified (496 dpa) is only a *rough* starting point for plan-making (because of the uncertainties associated with attributing the standard methodology figure to the National Park area versus the Local Plan area). There is also a need to consider options involving providing for a higher or lower growth quantum.
- 5.14 The first consideration relates to the likelihood of needing to provide for unmet needs arising from the **National Park**, noting the Statement of Common Ground (SoCG) agreed between the District Council and the National Park in March 2018. The SoCG commits the Park to providing 100dpa over the period 2017-

⁹ Please see the Council's Housing and Economic Development Needs Assessment for more information (available at: http://www.easthants.gov.uk/evidence-base).

2028 within its East Hampshire component part, i.e. a figure 12 dpa below the need figure discussed above. With regards to provision for the remainder of the plan period, i.e. the period 2028 to 2036, this is not addressed by the SoCG; however, it is fair to assume (taking a conservative approach, and ahead of further detailed work), that the National Park will deliver minimal new housing during this period. The SoCG notes that the District Council and the National Park Authority agree that it is not appropriate to seek to meet the full objectively assessed need in the South Downs National Park and that the two authorities will continue to work closely together to address future housing needs beyond 2028.

- 5.15 The next consideration relates to the possibility of needing to provide for **unmet needs** arising from neighbouring areas other than the National Park. The council areas with the strongest relationship to East Hampshire in housing terms are Waverley and Havant, with strong relationships also apparent with Portsmouth, Winchester and Chichester. At the time of writing, none of the councils for these areas has approached EHDC about the potential for accommodating unmet housing needs; however work is continuing under the "duty to co-operate"; it may be that, at a later stage in the plan-making process, the need to provide for some unmet needs is found to be necessary, in accordance with the NPPF. Table 5.1 presents a summary of the latest situation in respect of neighbouring authority Local Plan preparation.
- 5.16 There is also a need to note that parts of the southern parishes of East Hampshire (Clanfield, Horndean, Rowlands Castle) fall within the **PUSH** sub-region (and specifically the Portsmouth Housing Market Area part of the PUSH area); however, it is difficult to conclude on whether or not this leads to any risk of needing to provide for unmet needs. The PUSH Position Statement (2016) identified a shortfall of supply, against housing needs as understood at that time; however, since 2016 work has been ongoing to identify additional capacity, and indeed this current Local Plan is aiming to identify supply over-and-above that taken into account by the PUSH Position Statement (2016). The PUSH authorities, including East Hampshire, recognise a need to continue investigating all opportunities in order to avoid a shortfall; for example, there could be further opportunities to release public sector land, such as Ministry of Defence sites that lie within the PUSH area but outside of East Hampshire.
- 5.17 A final consideration relates to the **constraints to growth** that exist within the area covered by the Local Plan, which might serve to indicate that it is not appropriate to provide for housing needs in full, i.e. it is appropriate to 'export' some needs to a neighbouring authority. Strategic constraints as understood from NPPF footnote 6 relate to: setting of the South Downs National Park; areas of international importance for biodiversity; and the setting of the Surrey Hills Area of Outstanding Natural Beauty. However, there are also areas that do not have these constraints on development, and a large number of sites (i.e. sites with a total combined capacity sufficient to meet housing needs several times over) have been promoted in these less constrained areas. As such, and also given that neighbouring authorities are also subject to strategic constraints, there is not considered to be any realistic potential to export housing needs; rather, LHN/OAHN for 'East Hampshire outside of the South Downs National Park' must be provided for in full.

Conclusion

- 5.18 In conclusion, when seeking to establish reasonable spatial strategy alternatives there is a need to ensure that all involve provision for the housing needs of A) the part of East Hampshire that falls outside of the National Park; and B) anticipated unmet housing needs arising from the National Park. This means providing for a minimum of 10,456 new homes between 2017 and 2036, or 550 dpa on average (but more accurately 508 dpa for the period 2017 to 2028; and then 608 dpa for the period 2029 to 2036). This figure is the proposed 'housing requirement'. There is also a need to explore the potential for higher housing requirement, recognising the feasibility of needing to provide for unmet needs from elsewhere.
- 5.19 There are three final considerations:
 - It is not the role of the Local Plan to allocate sites to deliver the full housing requirement, but rather sites to deliver the shortfall after having accounted for supply from: A) completions since 2017; B) existing planning permissions; and C) an allowance for "windfall" sites.
 - There are also a number of existing local plan allocations that can be safely 'rolled forwards', i.e. reallocation within the emerging plan can safely be supported without detailed scrutiny through SA.
 - There is a need for a 'buffer' over-and-above the housing requirement of c.5-15% (depending on the sites allocated) as a contingency for unanticipated delays to delivery at one or more sites.
- 5.20 In light of the above points, the conclusion is a need to identify **allocations** to deliver 2,726 new homes, or 143 dpa on average over the 19-year plan period, plus a suitable buffer.

Table 5.1 Progress on neighbouring Local Plans

LPA	Next stage	Commentary on risk of needing to provide for unmet needs	
Basingstoke and Deane Borough Council	N/A (Local Plan 2011-2029 adopted 2016)	Basingstoke & Deane's planning policy service has indicated agreement that there is no strong functional relationship between the housing markets of Basingstoke & Deane and East Hampshire. As such, there is a very low risk that East Hampshire will need to accommodate unmet housing needs from Basingstoke & Deane.	
Chichester District Council	Regulation 18 (Preferred Approach)	The Chichester Local Plan will be published for consultation in early 2019. Chichester's planning policy service has indicated its agreement that the two authorities should continue to liaise and work with each other, in relation to the assessment of housing needs. However, it is noteworthy that the parts of Chichester that adjoin East Hampshire are part of the South Downs National Park. The risk that the East Hampshire Local Plan will need to accommodate unmet housing needs from Chichester is therefore very low .	
Hart District Council	Adoption	The Hart Local Plan has been submitted to the Secretary of State and is currently being examined. Hart forms part of a Housing Market Area with Rushmoor and Surrey Heath Boroughs; there is little interrelationship with East Hampshire. As such, there is a very low risk of unmet needs.	
Havant Borough Council	Regulation 19	Havant will be consulting on a pre-submission (Regulation 19) version of its local plan early in 2019. Havant Borough Council's planning policy service has noted the clear links, in terms of commuting patterns and migration, between the southern part of East Hampshire and the Solent sub-region. Both Havant and East Hampshire are constituent authorities of Partnership for Urban South Hampshire (PUSH) and will work together under this umbrella. There is some risk that East Hampshire will need to accommodate unmet housing need from Havant, recognising pressures from the wider PUSH area.	
South Downs National Park Authority	Adoption	The SDNPA Local Plan has been submitted to the Secretary of State and is currently being examined, and the other matter for consideration is the recent SoCG, as discussed above (para 5.16). As discussed above, there is a confirmed need for the East Hampshire Local Plan to accommodate unmet housing need from the National Park.	
Waverley Borough Council	Regulation 19	Waverley is preparing a Part 2 Local Plan, containing land allocations required to deliver Part 1 of its Local Plan, with a pre-submission (Regulation 19) version due for publication in late 2018. Although there are strong housing and employment links between Waverley and East Hampshire, Waverley has previously been identified as part of a Guildford-centric housing market and functional economic market area. Waverley's planning service has suggested that cross-boundary strategic issues are discussed through the preparation of a statement of common ground. There is low risk that East Hampshire will need to accommodate unmet housing needs.	
Winchester City Council	Regulation 18	Winchester is preparing a new Local Plan for the period to 2036. A draft (Regulation 18) local plan is scheduled for 2019. Winchester City Council's planning policy service has agreed that East Hampshire District Council should continue to liaise and work with them, in assessing housing needs. Both Winchester and East Hampshire are constituent authorities of PUSH and will work together, including through PUSH, to inform each other's Local Plans. As noted above, there is some risk that East Hampshire will need to accommodate unmet housing need from the PUSH area.	

Broad distribution

5.21 The three sub-areas of the Council's planning area present differing characteristics and local contexts for development, as a consequence of being geographically distinct areas of East Hampshire, separated by the South Downs National Park. These differences have implications for the broad distribution of growth through the Local Plan. A key question when considering the broad distribution of growth between the three sub-areas will therefore be: how should the individual needs, opportunities and constraints of each inform an appropriate balance of growth?

5.22 A brief overview of the three sub-areas is presented below, highlighting some of the social, environmental and economic characteristics, issues and opportunities.



Image of East Hampshire

The A31 corridor (and the rural north)

5.23 Existing development is concentrated in settlements along the A31, with Alton, Four Marks, Ropley and Bentley being the most significant of these. To the north is a rural landscape of rolling chalk hills.

- 5.24 Alton is a historic market town, the most significant local service centre and the largest settlement in the sub-area. It offers good transport connections to regional centres via the strategic road and rail networks, with rail connections to London Waterloo. The town itself is located at the source of the River Wey and is encircled by sloping downland, with limited visibility from surrounding areas.
- 5.25 The A339 runs north to from Alton to Basingstoke through the sub-area, but the primary transport axis is the A31 between Winchester and Farnham, continuing on to Guildford.
- 5.26 The Alton branch rail line follows the A31 corridor from the South Western mainline as far as Alton, where it terminates. The railway line and main road are located within the valley of the River Wey at this point. This is a historic pilgrims' route between Winchester and Canterbury.
- 5.27 The south of the sub-area follows the boundary of the South Downs National Park and much of this area is within the setting of the National Park.

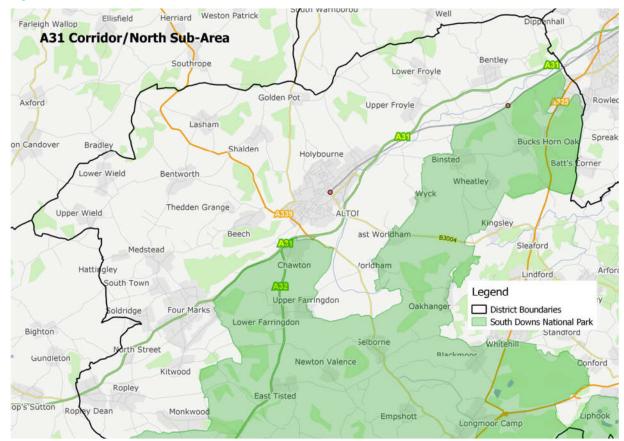


Figure 5.2: The A31 corridor / North sub-area

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North east of the District

5.28 This sub-area includes the town of Whitehill & Bordon and also the smaller settlements of Liphook, Grayshott, Headshott and Headley. Grayshott in particular links very closely with Haslemere in neighbouring Waverley Borough, whilst two A-roads link this area to Farnham, which is c. 10km to the north. The South Downs National Park borders the area to the west and south, constraining growth at Liphook in particular.

- 5.29 The town of Whitehill & Bordon is the main service and employment centre and has traditionally had strong associations with the military. As the armed forces have modernised, much of the defence estate has been and continues to be released into private ownership and this has presented significant redevelopment and regeneration opportunities, with further opportunities remaining.
- 5.30 Elsewhere in the sub area, the smaller settlements have a variety of characteristics, with Liphook and Grayshott having good connections to the strategic road network and, in Liphook's case, the rail network too. The more northerly settlements of Headley, Headley Down and Lindford are less well connected.
- 5.31 The sub-area contains significant areas of internationally and nationally important heathland habitat, as well as areas of extensive plantation forest (often former heathland).

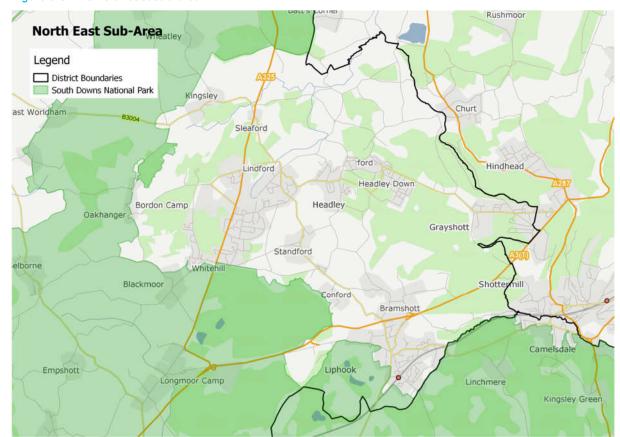


Figure 5.3: The north east sub-area

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Southern parishes

5.32 The southern parishes sub-area is at the far south of the District, immediately adjacent to Havant and Waterlooville to the south and enclosed by the chalk dip-slope of the South Downs to the north.

- 5.33 This area is relatively developed, in comparison to the rest of the District, with Horndean essentially forming the northern extent of the Havant and Waterlooville urban area. It is this wider coastal area, including Portsmouth, that provides access to higher order services and facilities and employment.
- 5.34 The A3(M)/A3 bisects the area from north to south and provides the main transport connection to Petersfield and beyond to the north, and Portsmouth and the Solent sub-region to the south. There is also a mainline railway station at Rowlands Castle.
- 5.35 Groundwater is a further consideration, with a groundwater source protection zone designated over the aquifer that serves the Portsmouth area with potable water. Also, a major new reservoir is planned immediately to the south of Roland's Castle (see www.portsmouthwater.co.uk/havant-thicket-reservoir).
- 5.36 Part of this area falls within the wider PUSH sub-region and Portsmouth Housing Market Area, which could potentially lead to a degree of development pressure (see para 5.18). However, it is important to note that this sub-area has seen the highest percentage increase in dwelling stock over recent years amongst the three sub-areas (also accounting for outstanding permissions). There is a need to consider the cumulative effects of recent growth when considering how to distribute future growth.

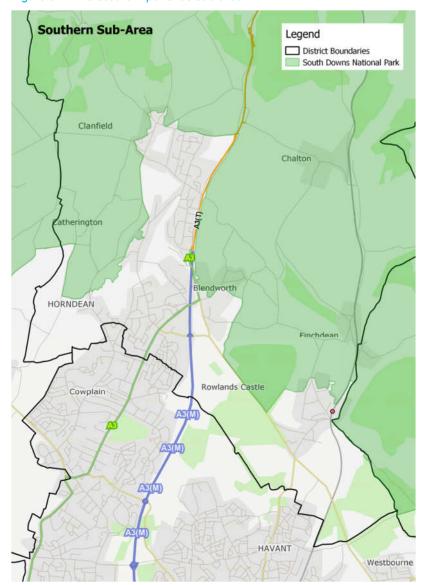


Figure 5.4: The southern parishes sub-area

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Strategic site options

Introduction

5.37 Among the c.270 site options identified through the Council's Land Availability Assessment (LAA), there are several 'strategic' sites with potential to deliver a minimum of several hundred homes each, along with new or upgraded strategic infrastructure assets, to serve both the new and existing development. For example, these assets may include new schools, enhanced road junctions or upgraded waste water treatment facilities, depending on an assessment of local needs. New infrastructure can help to mitigate impacts of development, and sometimes bring benefits to existing communities, and it is therefore reasonable to focus on strategic options for purposes of selecting reasonable spatial strategy alternatives.

5.38 The NPPF supports a focus on strategic site options, stating at paragraph 72:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should: a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains; b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access; c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided; d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)..."

- 5.39 The following five strategic site options have been identified (in rough descending scale-order):
 - Chawton Park Farm (A31 west of Alton)
 - Northbrook Park (A31 east of Bentley)
 - East of Horndean (southern extension to existing permitted 'East of Horndean' permitted site)
 - Whitehall & Bordon (continued strategic expansion)
 - Ropley (broad area north of the village)
- 5.40 These five strategic site options are considered further below.

N.B. several other large sites are also considered further below that arguably might be described as 'strategic', e.g. the option of strategic growth across a cluster of site options to the southeast of Liphook. There is no strict threshold for application when defining a site option as 'strategic'.

5.41 Finally, it is worthwhile highlighting one further location that was considered briefly by the Council, but ultimately not deemed suitably well-advanced to be considered a genuine 'option'. Specifically, the Council gave brief consideration to the option of a strategic expansion at Four Marks, potentially to the south of the village where a number of sites are being promoted in close proximity. There is a motivation for considering the possibility of strategic expansion at Four Marks, recognising that A) this is a relatively unconstrained and well connected area; B) there is a strong local desire to avoid further piecemeal expansion, recognising that infrastructure provision has not kept pace with the village's rapid expansion over recent decades; and C) there is desire for a better located primary school. However, on balance this is not a genuine option for the Local Plan. The 'motivation' is not sufficient to justify the amount of work that would be necessary in order to progress a strategic scheme to the point of detailed testing, given the total number of homes to be provided for through the Local Plan (see para 5.31), and other locations equally or more suited to strategic growth and with existing deliverable schemes already being promoted. If a coherent, strategically significant site at Four Marks (700+ new homes) were to be promoted in close proximity to the Four Marks' settlement boundary, through consultation on the draft local plan, the Council could potentially consider such an option further, when preparing the Proposed Submission Plan.

Chawton Park Farm

5.42 This strategic site option is located south west of Alton, north of the junction between the A31 and A32, lying in a depression in the landscape with wooded ridgelines to the north and south. The landform and dense woodlands combine to screen much of the site, such that there is a rural character despite the site's proximity to the A31.

- 5.43 A scheme has been proposed involving up to 1,250 new homes within the main site plus potential employment land adjacent to the A31. The new settlement would have a close relationship with Alton given its proximity and the proposed scale of growth. The development of a small village centre would be anticipated, to include a primary school, shop and potentially a health centre.
- 5.44 There are a number of environmental constraints including adjacent ancient woodland and Sites of Importance for Nature Conservation (SINCs) to the north and south of the site, constrained access to the A31 (due to a narrow railway arch), a listed farm house at Chawton Park Farm and an accessible rural landscape (albeit one which is relatively self-contained).

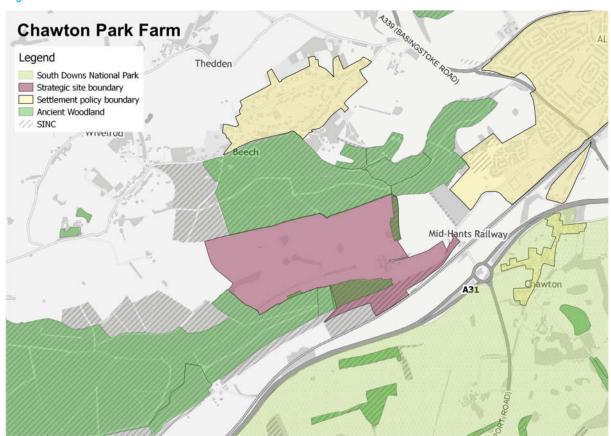


Figure 5.5: Chawton Park Farm

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Northbrook Park

This strategic site option is located in the northern part of the A31 corridor sub-area, on the boundary with Waverley Borough. The promoted site (LAA reference BEN-007) is located c.1.5km to the northeast of Bentley and c. 2km to the southwest of Farnham (town centre).

- 5.46 A scheme has been proposed on BEN-007 involving at least 800 homes plus supporting infrastructure; however, a preferable option would involve a larger scheme, also taking-in adjoining land to the east (within Waverley Borough) and/or west. Due to the potential for including this land as part of a wider development either within the plan-period or later an "area of search" is defined, surrounding the LAA site. At this stage, the Council considers that an independent development plan document could be used to define the precise boundaries of a mixed use development at Northbrook Park.
- 5.47 Any scheme would include a primary school, and new employment is also proposed. Suitable Alternative Natural Greenspace (SANG) would also be required, given proximity to the Thames Basin Heaths Special Protection Area (SPA).
- 5.48 The promoted site currently hosts a significant country estate which is principally used as a wedding and events venue. This estate includes a number of listed buildings (Grade II) that originally enjoyed a rural setting, but some are now in close proximity to employment uses.
- 5.49 The rest of the area remains largely undeveloped and includes areas of floodplain (south of the A31) and woodland, including an area of ancient woodland, with further ancient woodland SINCS adjacent. As with many parts of the Wey Valley, the southern parts of the "area of search" are also subject to groundwater flood risk.

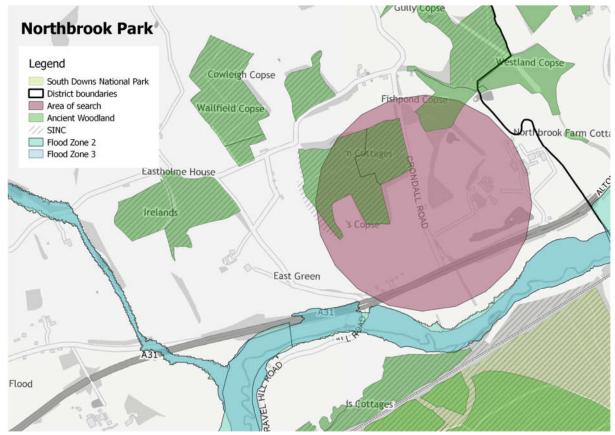


Figure 5.6: Northbrook Park Area of Search

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East of Horndean

This strategic site option is located immediately south of the "Land East of Horndean" site that was allocated for at least 700 homes through the East Hampshire Local Plan Part 2 (2016). The new site is well defined by existing features on the ground with the A3(M) to the west, the B2149 to the east and established woodland to the south. Capacity is c.1,000 homes.

- 5.51 This area is largely undeveloped and has a rural feel, despite its proximity to developed areas. It adjoins large SINCs, including areas of ancient woodland, whilst the wider area is known to be an important habitat for Bechstein's bats. Despite these constraints, the Council's landscape capacity study notes the possibility of extending the existing allocation.
- 5.52 Another consideration is the possibility planning for a comprehensive 'East of Horndean' scheme including the current Local Plan Part 2 allocation (i.e. joint planning for the two adjacent sites). This could achieve a more coherently planned and designed extension to Horndean.

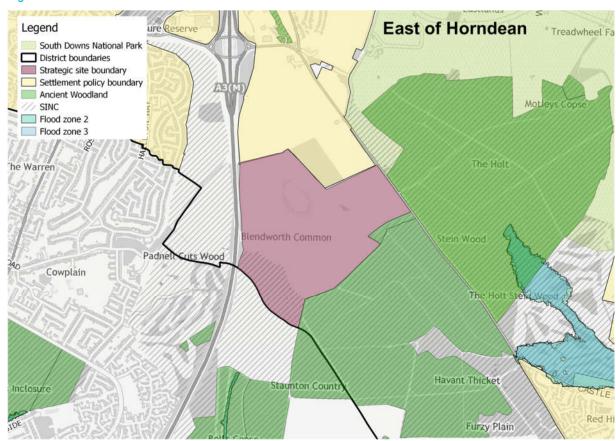


Figure 5.7: East of Horndean

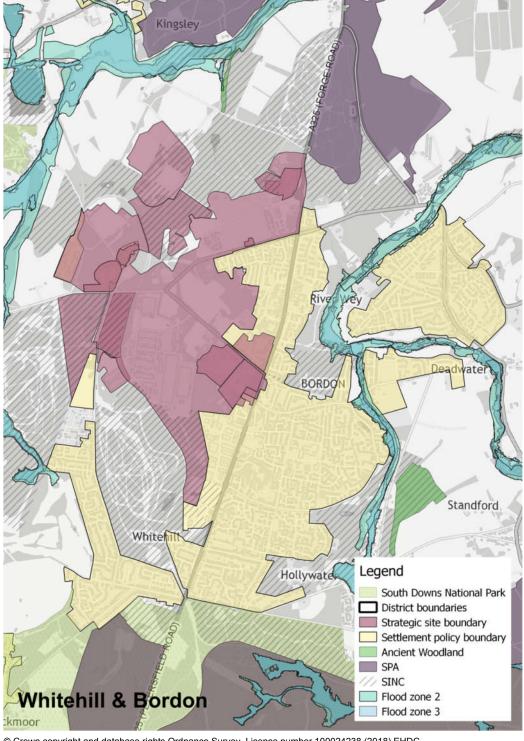
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Whitehill & Bordon

A number of significant sites are available with a combined capacity of around 1,200 homes, plus sites are being promoted for employment uses and supporting infrastructure, including SANG. Taken together, these sites represent a strategic opportunity to build upon the regeneration of Whitehill & Bordon.

The sites are a mixture of undeveloped or underdeveloped land adjacent to the existing built area, and 5.54 previously developed sites within the existing settlement. There is the potential for allocations to create a more coherent and connected built-up area, consolidate the existing regeneration activity and increase the provision of supporting infrastructure. The current regeneration activity involves the development of a new town centre to the west of the A325, and there is the potential for further allocations to support the vitality and viability of the new services and facilities.

Figure 5.8: Whitehill & Bordon



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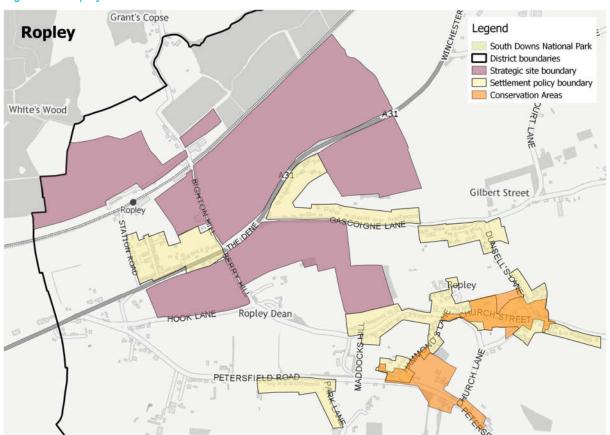
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Ropley

5.55 This strategic site option comprises a variety of land parcels, with a combined capacity of around 1,500 dwellings, which are being jointly promoted as a strategic expansion of Ropley.

- 5.56 This is a notably different proposal to those discussed above, in that the effect would clearly be to transform the existing settlements of Ropley and Ropley Dean. This area has a strong rural setting and its linear built form leaves abundant open green space between the dispersed pockets of development.
- 5.57 The promoted development opportunities would infill the gaps between the various ribbons to form a more coherent, nucleated settlement. There would be the potential to deliver a primary school and other village facilities.
- 5.58 There are local heritage constraints (a conservation area and listed buildings) as well as the potential for landscape impacts within the setting of the South Downs National Park. More generally, the effect of 'transforming' the existing village(s) would be felt acutely by existing residents.

Figure 5.9: Ropley



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Smaller site options

- 5.59 In addition to the 'strategic' site options introduced above, there is also a need to give consideration to the large number of smaller site options that have been submitted to the Council through the LAA process.
 - N.B. sites are referred to below according to the reference number assigned through the LAA. The LAA is available on the Council's website as a supporting document to the draft local plan
- 5.60 LAA sites were run through GIS analysis (see Appendix IV), and many were also discussed at a series of workshops, namely the workshops that have already been introduced above at para 5.4. Through the workshops there was naturally a focus on sites with fewer constraints and more opportunities but participants of latter workshops were invited to comment on any LAA site.
- 5.61 All smaller site options are shown in the figure below, and discussed in the following section (alongside the strategic site options), which examines sub-area and settlement options.

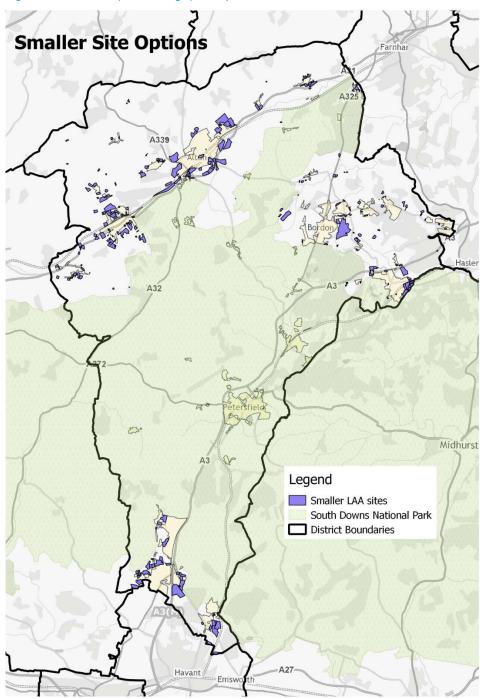


Figure 5.10: Smaller (non-strategic) site options

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Sub-area and settlement options

5.62 Discussion has so far focused on A) 'top down' considerations in relation to housing quantum broad distribution; and B) 'bottom-up' factors, namely strategic and smaller (non-strategic) site options.

- 5.63 The next step is to consider each of the District's three sub-areas in turn, giving consideration to how site options might be delivered in combination.
- 5.64 The following sections examine options at the following locations in turn:
 - A31 Corridor sub-area
 - Alton and environs (includes Beech and the Chawton Park new settlement option)
 - Bentley and environs (includes Northbrook Park new settlement option)
 - Four Marks, South Medstead and Medstead
 - Ropley and Ropley Dean
 - Northern sub-area
 - Whitehill & Bordon and environs (includes Kingsley, Lindford, Passfield and and Oakhanger)
 - Liphook and environs (includes Branshott and Griggs Green)
 - Grayshott, Headley and Headley Down
 - · Southern Parishes sub-area
 - Clanfield and Catherington
 - Horndean and Lovedean
 - Rowlands Castle Parish
- 5.65 All site options are examined through the discussion below except those at the small rural villages of Bentworth, Holt Pound, Lower Froyle, Upper Froyle, Lasham, Monkwood, Sleaford, Standford, Upper Wield and Lower Wield, and outlying sites poorly related to a settlement.¹⁰ There is potential to bring forward sites at small villages through future neighbourhood plans.

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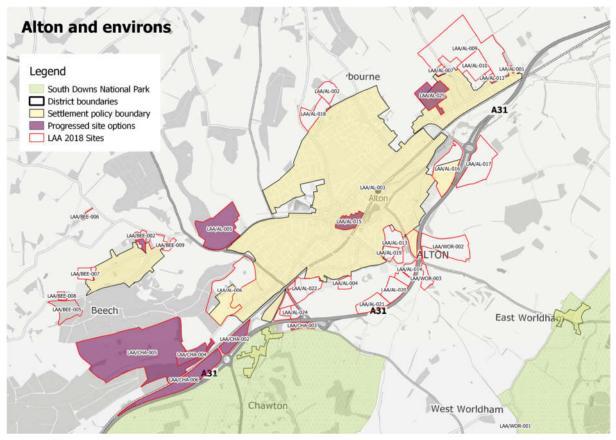
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¹⁰ Of the smaller villages listed it is Upper Froyle that is notable for being 'less rural', in that it is located close to the A31 and relatively close to the higher order towns of Alton and Farnham; however, the village is sensitive in landscape and heritage terms, with these sensitivities serving to constrain the two sites that have been promoted. It follows that it is not necessary to consider Upper Froyle further below.

Alton and environs

5.66 Alton is at the top of the plan area's settlement hierarchy and very well linked by road and rail, hence there is a strong argument for directing a significant proportion of the total housing quantum to the town. However, Alton's development potential is limited by its topography (associated with the Wey Valley), its proximity to the National Park, heritage constraints and flood risk.

Figure 5.12: Site options at Alton and environs



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- 5.67 Beginning at **Holybourne**, which is a historic settlement now linked to the north of Alton, a number of sites have been proposed for residential development including a cluster to the north of the current built area; however, none of these sites warrant examination through the reasonable spatial strategy alternatives. These sites are subject to heritage and townscape constraint, noting proximity of the Holybourne Conservation Area. A further consideration is the 'Cuckoo's Corner Roman Site' Scheduled Monument to the east and significant areas of groundwater flood risk.
 - **N.B.** allocation of AL-025 is supported to facilitate modernisation of the Lord Mayor Treloar School and deliver the associated community benefits of improved educational facilities.
- 5.68 Moving east, the next cluster of sites proposed for residential or employment development is to **east** / **south-east** of the town, also taking-in two sites in or around the town centre. Comments are as follows:
 - The two sites in the urban area (AL-015 and AL-003) are brownfield sites close to services and facilities and hence suited to development; however, AL-003 is a small site that need not be allocated through the Local Plan, i.e. it can come forward, in accordance with development management policy, without an allocation. Although AL-015 appears subject to flood risks, further discussions are required with the Environment Agency to ascertain the actual degree of constraint.

• There is a succession of sites in close proximity to the A31 that would either extend the town eastwards or create a ribbon of residential development alongside the A31. All are constrained by the topography, with views to the National Park a consideration, and all are relatively poorly linked to the town centre. The two adjacent sites at the northern extent of the cluster, between Wilsom Road and Windmill Lane (AL-013 and AL-019) perform relatively well in these respects; however, both are nonetheless considered subject to constraint in both landscape and access terms. Groundwater flood risk is a further consideration in this area, e.g. WOR-002 and WOR-003, which are promoted for employment use, are significantly encumbered by groundwater and other flood risks.

- Two sites have been promoted on the eastern edge of the town for employment uses (AL-016, AL-017). Land to the east of the A31 is sensitive in landscape terms and there is groundwater flood risk at both sites. However, AL-016 is in an area that could be made accessible to other areas in Alton, as well as having good access to the A31. This site is already an allocated employment site in the local plan and has scope to be enlarged to provide additional commercial floorspace.
- 5.69 The next cluster of sites is at the **southern edge** of the town, abutting the A339. Comments are as follows:
 - Two of the sites (AL-022 and AL-006) are commitments, although AL-022 includes additional land to the west of the A339 (see next bullet point).
 - The sites in the 'triangle' of land between the A31, A339 and Winchester Road are constrained by flood risk, with access a further consideration.
 - The one site to the south of the A31 (CHA-003) does not relate well to Alton, with proximity to the Chawton Conservation Area a further consideration. However, the site does have very good access to the A31. This site is taken forward as being potentially suitable for gypsy, traveller and travelling showpeople use.
- 5.70 The remaining sites at Alton are located on the **northern and western** fringes (AL-005, AL-002 and AL-018) on rising land visible from the edge of the urban area / routes out of the town. Sites AL-002 and AL-018 are constrained in landscape terms, with both sites breaking the 150m contour, and the sites are also distant from the town centre (via a steep hill). However, AL-005 is considered *relatively* unconstrained in landscape terms. A primary constraint is the cluster of heritage assets at the eastern edge of AL-005; however, there is thought likely to be good potential to suitably avoid/mitigate impacts through development management.
- 5.71 Next, there is a need to examine sites at **Beech**, which is a small village closely related to Alton. Of the nine site options, two sites have merit (BEE-004 and BEE-009). Both are relatively unconstrained; however, BEE-009 is more constrained in landscape/townscape terms by virtue of its location at the entrance to the village. BEE-004 also benefits from good access to the village hall (which is the only local facility within the village).
- 5.72 Finally, there is a need to consider the Chawton Park Farm new settlement option (CHA-005; along with employment at CHA-004), as well as associated and nearby sites promoted for employment uses (CHA-002 and CHA-006). Whilst the new settlement site is subject to significant constraints, it does warrant further consideration given the potential to deliver a mix of uses and new/upgraded infrastructure, as well as given good links to Alton and the strategic road network. With regards to the employment site options, CHA-002 is visible from the cycle route that links the south of Alton to Four Marks, but it is otherwise well contained, and links well to the A31; whilst CHA-006/CHA-004 could provide additional employment opportunities associated with Chawton Park Farm, but would otherwise be unsuitable for employment, on the basis that they would be an isolated urbanising influence on the landscape.
- 5.73 In **summary**, eight site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives see Table 5.2. The table also identifies four sites that 'stand-out' as performing notably well (relative to all sites District-wide, and given established needs for the promoted uses).

Table 5.2: Site options progressed to the reasonable spatial strategy alternatives

Site	Name	Number of new homes	'Stand-out' site?
AL-015	Former Coors Brewery, Alton	140-200	Yes
AL-005	Land at Brick Kiln Lane & Basingstoke Road, Alton	171-255	
CHA-005	Chawton Park Farm	1,000-1,250	
BEE-004	Beech Copse, Beech	5-10	
AL-025	Lord Mayor Treloar School	N/A	Yes
CHA-002	Land adjoining Northfield Lane, Alton	N/A	Yes
CHA-003	Land to the north of Wolf's Lane, Chawton	N/A	Yes
CHA-006	Land at Chawton Park (Employment)	N/A	
Total hom	ies	1.316 - 1.715	

5.74 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:

- the 'stand-out' sites would be delivered under any scenario (which is not to say that allocation need not be the focus of appraisal see Part 2 of this report);
- there is a need to allocate either AL-005 or CHA-005, given that Alton is suited to growth, but these two sites would not be allocated in combination, given their proximity; and
- CHA-006 would come forward alongside CHA-005, as part of a comprehensive mixed-use new settlement.

Bentley and environs

- 5.75 The village of Bentley lies in the Wey Valley, immediately to the north of the A31. It has its own railway station, albeit one which is located slightly outside the village itself, to the south of the A31 and the river. The presence of the A road and the railway station gives Bentley very good transport connections, with the fastest train services taking around an hour to London Waterloo.
- 5.76 In this context there is clearly potential to explore development options at Bentley and a number of site options have come forward. These are broadly grouped into two areas of the village, with a number of sites coming forward in the mainly open, low-lying and undeveloped space between the village core and the A31 and a second cluster north of the main built area, between the village core and Hole Lane.
- 5.77 Furthermore, it is appropriate to give consideration here to the Northbrook Park new settlement option, given its location c. 1.5km to the east of Bentley.

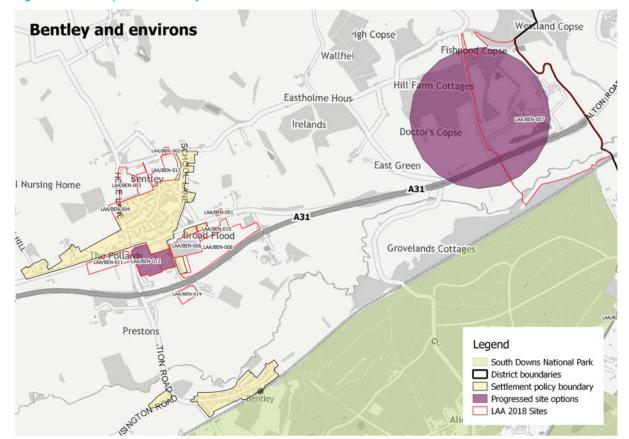


Figure 5.13: Site options at Bentley and environs

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- 5.78 Beginning with the **northern** cluster of site options, there are limited environmental constraints, and the three larger adjacent sites can be considered relatively well contained in the landscape, on the basis that they would infill an area of farmland bounded on all sides (by the existing village to the south, and by lanes to the west, north and east). The village edge would move closer to St. Mary's Church (Grade II* listed) to the north, which is on raised ground above the village, but a landscape gap (>200m) would remain. However, the accessibility of these sites is a concern, both by car and by foot, given the narrow lanes in this area.
- 5.79 With regards to the **southern** cluster, the land benefits from being flat and with good access to the main road through the village; however, the cluster of sites is constrained by proximity to the Bentley Conservation Area to the north, and the A31 to the south. There is also a degree of surface water flood risk affecting the eastern-most site within the cluster (BEN-008). Ultimately two sites (BEN-005 and BEN-012) were identified as performing relatively well. These sites are within/adjacent to the conservation area, and readily visible from the main road, but benefit from close proximity to the village centre (indeed, the village pub and shop are adjacent, as is a small industrial estate. There is also one stand-alone listed building (Grade 2) to the south of these two sites, which would likely require a green buffer to be retained.
 - **N.B.** BEN-014, a small site to the south of the A31 that is potentially suitable for gypsy and traveller use, but which need not be the subject of further detailed consideration given that is of a very small scale (limited to one or two additional pitches). The site is constrained by the adjacent A31 and also an adjacent sewage treatment works; however, there is an existing site that could be suitable for expansion.
- 5.80 The final residential / mixed use site option is the **Northbrook Park** new settlement "area of search", which has already been introduced above. In short, the area of search is subject to significant constraints, but warrants further consideration given the potential to deliver a mix of uses and new/upgraded infrastructure, as well as given good links to Farnham and the strategic road network. Initial indications are that any new settlement could deliver c.800 homes in this plan period (post-2036), with further housing beyond the plan period.

In **summary**, three residential or mixed-use site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives - see Table 5.3. None of these can be described as 'stand-out' sites (unlike the four sites at Alton identified in Table 5.2, above).

Table 5.3: Site options progressed to the reasonable spatial strategy alternatives

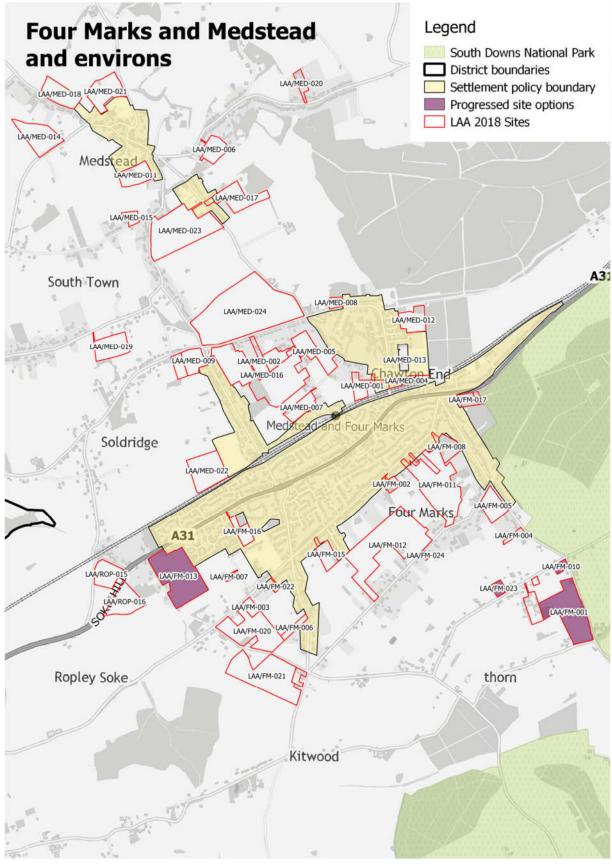
Total homes		850 - 870
Northbrook Park (Area of search)		800
BEN-012	Land west of Talgarth, Main Road, Bentley	25-35
BEN-005	Land west of Rectory Lane, Bentley	25-35
Site	Name	Number of new homes

- 5.82 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:
 - · nil allocations is an option;
 - BEN-005 and BEN-01 would be delivered in combination, in order to achieve a comprehensive scheme of a scale that could mitigate/avoid adverse impacts; however, it would be feasible to allocate just one of these sites; and
 - allocation of Northbrook Park as a new settlement area of search (AoS) may negate the need for an allocation at Bentley itself, recognising the limited local need in Bentley and the potential for incombination impacts.

Four Marks and Medstead

- 5.83 The village area of Four Marks straddles the A31 and has grown in a linear pattern along the alignment of this road, with frontage development (as opposed to development in depth) dispersed along lanes to the south. Four Marks is bounded to the north by the Watercress railway line, beyond which is the area of South Medstead, comprising mostly frontage development dispersed along rural lanes. To the north of this area is the more nucleated village of Medstead. The settlement is one of the highest in Hampshire and is located in close proximity to the boundary of the South Downs National Park.
- 5.84 Beginning with sites at **Medstead**, at the northern extent of this area, there are eight sites in total, with roughly half of these associated quite closely with the main village, and half associated more with the landscape gap that exists between Medstead and South Medstead / Four Marks to the south. There are limited heritage and environmental designations in this area (Medstead does not have a conservation area), but all sites would impact upon the rural landscape and/or low density townscape. More generally, Medstead is a small rural settlement located away from the strategic road network, albeit the village does have a primary school, shop / post office, hardware store, pub and village hall.
- 5.85 Moving south, there is quite a large number of sites associated with **South Medstead**, i.e. the settlement area to the north of the railway line. These sites are subject to limited environmental constraints and tend to offer some potential to consolidate the existing built form; however, all sites to the north of the railway are potentially constrained in access terms by the narrow tunnel carrying Lymington Bottom Road beneath the railway line and the narrow bridge connecting Boyneswood Road to the A31. It is difficult to envisage a combination of sites that would lead to sufficient funding becoming available to deliver road infrastructure enhancements at both locations, given the likely costs involved. Moreover, all of these sites are relatively distant from the primary schools at Four Marks and at Medstead and these facilities would not be accessible by sustainable modes (walking and cycling).
- 5.86 Finally, at **Four Marks** (i.e. the settlement area to the south of the railway line) there are numerous site options dispersed along the full extent of the settlement edge (less so the eastern edge, which is constrained by the National Park). There are a number of summary points to make:
 - A number of sites principally FM-012, FM-020, FM-021 perform poorly on the basis that they do not relate well to the existing settlement and/or would lead to an incongruous built form (development tends to run in a linear fashion along lanes), potentially with implications for the setting of the SDNP.

Figure 5.14: Site options at Four Marks and Medstead



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• Eight sites – FM-002, FM-008, FM-011, FM-013, FM-015, FM-016 – could potentially perform better in landscape / townscape terms, of which one site in particular (FM-013) stands-out as the most suitable for residential purposes. This site would benefit from direct access onto the A31, and as a larger site (150 home capacity) it could deliver some (limited) enhancements to local infrastructure to ensure pedestrian connections to the village centre. Although relatively distant from the village centre, sports and recreation grounds are close by and the site adjoins some allotments.

- Following-on from the bullet point above, of the seven remaining sites, five have been promoted for residential use. Some of these residential options would deliver substantial infilling of the open fields between existing ribbons of development, whilst others appear likely to lead to a loss of local green infrastructure (trees, hedgerows). They are therefore less acceptable in terms of impact on the local townscape and landscape. Many of these sites are also smaller sites that would give rise to concerns in respect of continued piecemeal expansion of Four Marks, and in areas where pedestrian connections to services and facilities are absent or indirect.
- Finally, there is a need to consider a small number of remaining sites promoted for non-residential uses:
 - FM-001 comprises land at Four Marks Golf Club that is proposed for development as a hotel.
 There is a need to consider this proposal closely, weighing the rural (but otherwise relatively unconstrained) location against the benefits that a hotel could bring, including in respect of employment for local people and additional visitor facilities.
 - FM-010, FM-023 and FM-024 have been made available as potential Gypsy and Traveller sites and are considered potentially suitable, subject to further work. These sites are in quite a rural location, but might be considered suitably well linked by vehicular modes to Four Marks (and, in turn, the strategic road network). A number of other sites have also been made available for Gypsy and Traveller use but are not considered suitable at this time.
- 5.87 In **summary**, five site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives see Table 5.4. The table also identifies three sites that 'stand-out' as performing notably well (relative to all sites District-wide, and given established needs for the promoted use).

Table 5.4: Site options progressed to the reasonable spatial strategy alternatives

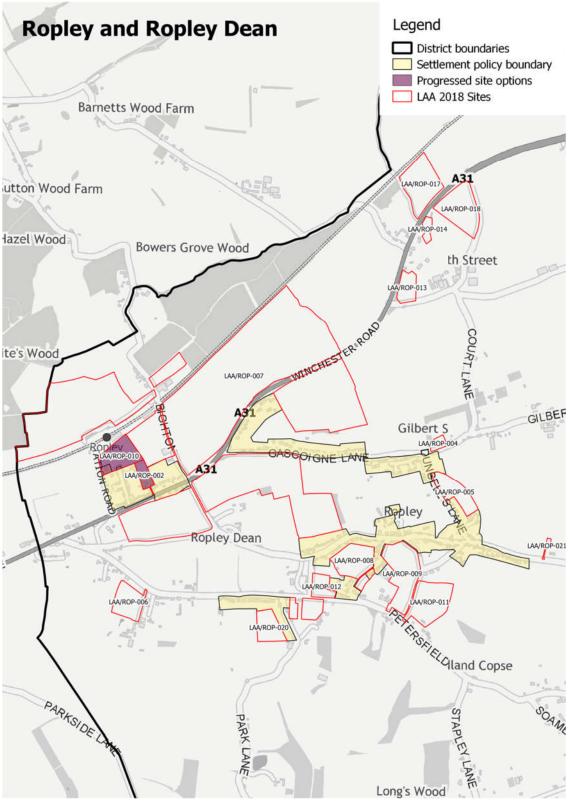
Site	Name	Number of new homes	'Stand-out' site?
FM-013	Land south of Winchester Road, Four Marks	130-150	
FM-001	Land at Headmore Farm, Four Marks Golf Club	N/A	
FM-010	Janeland, Willis Lane, Four Marks	N/A	Yes
FM-023	Briars Lodge, Willis Lane	N/A	Yes
FM-024	Land between Teazkes and Coombe Dell	N/A	Yes
Total homes		130 - 150	

- 5.88 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:
 - the 'stand-out' sites would be delivered under any scenario (which is not to say that allocation need not be the focus of appraisal see Part 2 of this report; although sites FM-023 and FM-024 are too small less than five new gypsy/traveller pitches to be of strategic significance);
 - nil allocations for residential is an option;
 - FM-013 and FM-001 could come forward in combination, were there to be a focus on developing new
 homes in the A31 corridor, or not at all if the focus for development was elsewhere in the District. New
 employment opportunities alongside new housing could help to reduce commuting distances.

Ropley and Ropley Dean

Ropley is a historic village (it has two designated conservation areas) set back from the A31 corridor but quite well linked by the Petersfield Road. Ropley Dean is a smaller settlement to the west, straddling the A31. Ropley village has a distinctive linear settlement pattern, with a strong rural and open character that is well integrated with its green, countryside setting.

Figure 5.15: Site options at Ropley and Ropley Dean



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5.90 There are two main site groupings in the Ropley area, one comprising sites at either side of the A31, including at Ropley Dean, and one comprising sites further south, at Ropley village itself. In addition, there is the possibility of a more strategic expansion of the settlement, which could infill much of the undeveloped land between Ropley and Ropley Dean (which has already been introduced, above).

- 5.91 The promoted sites at **Ropley village** generally comprise greenfield gaps between the existing development ribbons, such that development would have a significant urbanising influence, potentially with implications for the setting of the conservation area / listed buildings. There are also potential access issues given the narrow country lanes.
- 5.92 The A31/Ropley Dean grouping comprises a more limited number of mostly larger sites. The sites are mostly adjacent to the A31 and avoid the constraints of the narrower lanes serving Ropley village; however, impacts to landscape and rural character remain a concern. Also, in infrastructure terms, it is noteworthy that neither Ropley nor Ropley Dean is served by a mains sewerage network, which is likely to limit the area's capacity for residential development. However, two sites stand-out as performing relatively well (ROP-002 and ROP-010). Development could integrate with, and potentially serve to consolidate, the existing built form; and, more generally, there is a desire to deliver some housing in this area to contribute to meet local housing needs, i.e. needs associated with this part of the District.
- 5.93 One site that does not fit neatly into the above categories is ROP-006, which is a 2ha site to the **south of the area**, along Petersfield Road and in quite close proximity to the A31. This site has some merit, but on balance is not supported as its development could lead to landscape / townscape impacts by undermining the dispersed, open character of development in/around Ropley on what is a visually prominent site.
- 5.94 Finally, the possibility of a **strategic scheme** involving some or all of ROP-007 has already been introduced above; however, on balance it appears unreasonable to consider this option any further. Development on such a scale is likely to have an adverse, transformational effect on the existing historic and landscape/townscape character of the area, whilst it's not clear that the scale would be sufficient to deliver the level of required new infrastructure. For example, an entirely new sewerage network would be required and wastewater would need to be transferred large distances to a suitable treatment facility.
- 5.95 In **summary**, two site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives see Table 5.5. None of these can be described as 'stand-out' sites (unlike the two sites at Four Marks identified in Table 5.4, above).

Table 5.5: Site options progressed to the reasonable spatial strategy alternatives

Total homes		55 - 76
ROP-010	Land at Five Acres, Ropley	50-66
ROP-002	Aurea Norma and Builders Yard, Ropley Dean	5-10
Site	Name	Number of new homes

- 5.96 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:
 - nil allocations is an option;
 - ROP-002 and ROP-010 would be delivered in combination, in order to achieve a comprehensive scheme of a scale that could mitigate/avoid adverse impacts and provide additional affordable housing; however, there is the feasibility of allocating just one of these sites.

Whitehill & Bordon and environs

5.97 This area comprises the town of Whitehill & Bordon along with villages of Lindford, Kingsley, Oakhanger and Passfield. Whitehill & Bordon is one of the largest settlements in the Local Plan area and is set within a landscape of conifer forest and heathland, largely between the River Slea and River Wey. By contrast with Alton, the town is not a traditional market town but was formed as an army camp on a former toll road. Whitehill & Bordon lacks a historic town centre, but effectively grew up to service the needs of the former military bases. Similar to Alton, the town is close to the boundary with the South Downs National Park, which lies to the south and west.

5.98 Site options at Whitehill & Bordon should be considered in the context of the extensive redevelopment that is already taking place, and in the context of their ability to facilitate on going strategic infrastructure delivery and regeneration of the former military bases. Similarly, opportunities at Whitehill & Bordon should be seen in the context of the town's strategic constraints, which include the presence of the Wealdon Heaths Phase II SPA to the south, north and north east and a network of SINCs at the periphery of the existing built area.

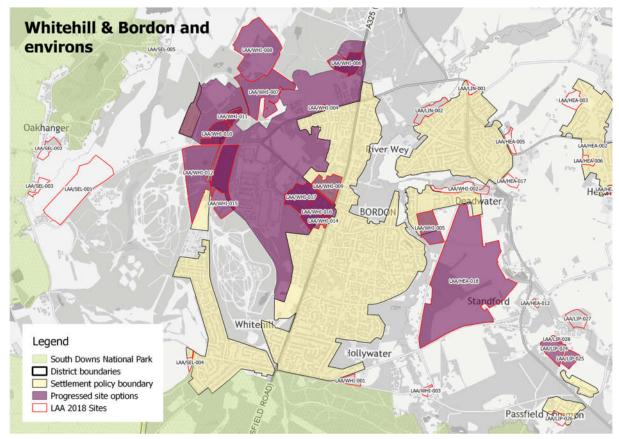


Figure 5.16: Site options at Whitehill and Bordon and environs

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- 5.99 Beginning with the cluster of sites in the **centre of Bordon**, associated with the new town centre at the former Prince Philip Barracks, all are broadly supported as appropriate locations for redevelopment and intensification of residential use. Additional residential development could help to deliver a vibrant new retail centre for Whitehill & Bordon.
 - N.B. in addition to the LAA sites promoted for on-going regeneration, an additional 201 new homes could come forward within the plan period within the currently designated regeneration area, as a result of the re-configuration of existing land parcels (for which a hybrid planning application has been approved).
- 5.100 Moving to the north, there is a sweep of sites associated with the **northern and north-western edge** of Bordon, comprising several sites promoted for residential uses, two sites promoted for employment uses and two sites promoted for SANG. These sites are associated with either the former Louisburg Barracks and adjacent designated Enterprise Zone at the north of the town, 11 the new relief road extending west from Louisberg Barracks, or redevelopment sites alongside the new Bordon Bypass to the west of the town (including Bordon Enterprise Park). 12 Most of these site options are supported on the basis that they involve relatively modest extensions to recent or ongoing redevelopment areas (WHI-013 is a larger site, at 6.6 ha, but only 30 homes are proposed with the remainder proposed as green infrastructure). New employment and SANG could be provided alongside new residential uses, albeit the loss of existing forested land (i.e. WHI-012 and WHI-013 is a consideration in landscape terms. Seemingly the most constrained site is WHI-008, which would link to the built form of Bordon via a large SANG, and so would be relatively isolated; it also intersects a SINC. However, this site is a former parade ground and therefore includes previously developed land, potentially suitable to redevelopment.

¹¹ See easthants.gov.uk/sites/default/files/documents/WaB%20EZ%20business%20rates%20relief%20policy%200618.pdf

¹² See bordonenterprisepark.co.uk

5.101 Next there is a need to briefly consider the three small sites along the **southern edge** of Whitehill and Bordon, all of which are in close proximity to the Woolmer Forest part of Wealdon Heaths Phase II SPA (SEL-004, WHI-001 and WHI-003), and hence unsuitable for residential use due to the potential for recreational impacts on the SPA. WHI-003 is also available for older persons accommodation, which would reduce concerns in respect of proximity to the SPA; however, this is an unsuitable rural location with poor accessibility to Whitehill & Bordon by sustainable modes of transport.

- 5.102 Moving to the south-eastern edge of Whitehill & Bordon, there are three sites in the area of land bounded by the River Wey to the north and east, and the Dead Water to the west. The largest of the sites (HEA-018) is owned by Hampshire County Council and is being promoted mostly for SANG, with residential proposed at the northern extent of the site (c.360 homes; subject to further work). WHI-005 is nearby, and would involve redevelopment of Mill Chase Academy, the school having already closed and relocated to the new town centre. Both site options are tentatively supported, although there is a need to consider in-combination impacts on road traffic, noting that the sites would not make use of the new Bypass and Relief Road at the town's western edge. The final site in this area (WHI-002) is not supported, due to flood risk and heritage (conservation area) constraints.
- 5.103 Finally, there is a need to consider the smaller sites around Lindford, Kingsley, Oakhanger and Passfield:
 - Lindford is separated from Bordon by a meander in the River Wey. All three housing site options are constrained given proximity to the Wealdon Heaths Phase II SPA (LIN-001), fluvial and groundwater flood risk (LIN-002) or proximity to the Headley Mill Conservation Area (HEA-017). There is also one site (HEA-005) being promoted for older persons accommodation; however, this site is poorly integrated with the existing settlement, being separated by a busy road, and is relatively distant from local facilities and services.
 - Kingsley is a small rural village without a primary school, although the Kingsley Centre does comprise a village shop, post office and a nursery. The village is significantly constrained by the presence of Kingsley Common, which forms part of the Wealden Heaths Phase II SPA and by the potential for development to cause adverse impacts on the setting of the SDNP. Consequently, none of the residential site options warrant being taken forward. One small site (KIN001) has been promoted for gypsy and traveller uses, but this site is unsuitable due to flood risk.
 - Oakhanger is a smaller village than Kingsley, and with even more limited facilities. The site options
 are larger and would significantly alter the existing linear settlement pattern. Oakhanger is also
 constrained by the adjacent South Downs National Park and by Shortheath Common, which is a
 designated SSSI & SAC. Oakhanger arguably benefits from proximity to Bordon's western expansion
 areas, but connections are via relatively minor roads which lack pedestrian and cycle infrastructure.
 - Passfield adjacent employment sites LIP-024 and LIP-025 (almost 6ha in total) would potentially more than double the size of Passfield Mill Business Centre, and make a significant contribution to the District-wide objective of bringing forward new employment land. These sites are subject to some constraints, given the adjacent SPA to the south and the adjacent Wey Valley Conservation Area to the north (with a footpath passing through the proposed development area linking the SPA to the river valley); however, the NPPF is supportive of employment growth in rural areas, and this is already a thriving business location. The sites also benefit from substantial screening from the public highway.
- 5.104 In **summary**, 18 site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives see Table 5.6. The table also identifies 15 sites that 'stand-out' as performing notably well (relative to all sites District-wide, and given established needs for the promoted uses).

Table 5.6: Site options progressed to the reasonable spatial strategy alternatives

Site	Name	Number of new homes	'Stand-out' site option?
HEA-018	Land off Hollywater & Whitehill Road	100-360	Yes
WHI-004	Former Garrison Church	10-19	Yes
WHI-005	Mill Chase Academy and Leisure Centre	150	Yes
WHI-009	Annington Estate, Essex Close	204	Yes
WHI-010	Annington Estate, BOSC South	42	Yes
WHI-011	Annington Estate, BOSC North	10	Yes
WHI-013	The Croft, Hogmoor Road	30	Yes
WHI-014	Sacred Heart Church and nursery, High St	87	Yes
WHI-016	Town Centre Phase 1	186	Yes
WHI-017	Town Centre Phase 2	186	Yes
WHI-008	BOSC Village	338	
N/A	Intensification of current regeneration area	201	Yes
WHI-006	Enterprise Zone (increased employment)	N/A	Yes
WHI-007	Oxney Farm SANG	N/A	Yes
WHI-012	SLAB SANG, Oakhanger Road	N/A	Yes
WHI-015	Building 84 (employment)	N/A	Yes
LIP-024	Land adj. to Passfield Mill Business Centre	N/A	
LIP-025	Milcott Meadow, Mill Lane, Passfield	N/A	

Total homes 1,544 - 1,813

5.105 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:

- the 'stand-out' sites would be delivered under any scenario (which is not to say that allocation need not be the focus of appraisal see Part 2 of this report);
- WHI-008, LIP-024 and LIP-025 could come forward in combination, were there to be a focus on developing new homes in the north east, or not at all if the focus for development was elsewhere in the District. New employment opportunities alongside new housing could help to reduce commuting distances.

Liphook and environs

5.106 This area comprises the local service centre of Liphook, along with the nearby smaller villages of Bramshott and Griggs Green.

5.107 Liphook is well-linked to the strategic road network (the A3) and has a mainline railway station. As such, it is appropriate to explore opportunities for growth; however, Liphook is subject to a number of landscape and environmental constraints limiting its growth potential. Liphook is immediately adjacent to the South Downs National Park which wraps around the southern extent of the village, and is in close proximity to the train station (limiting potential for development here); and is also constrained by the potential for adverse recreational impacts on internationally designated biodiversity sites, including the SPA and SAC at Woolmer Forest (part of the Wealden Heaths Phase II SPA).

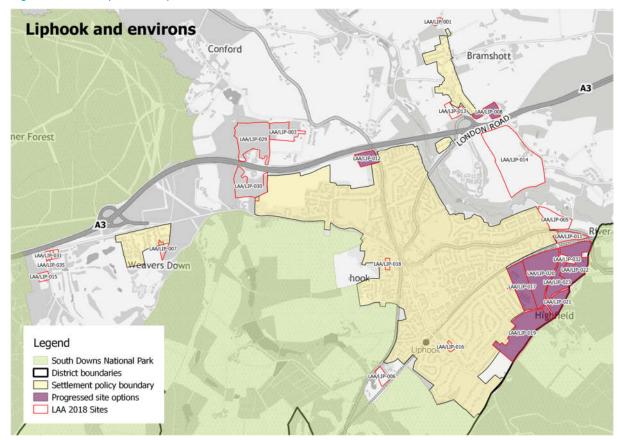


Figure 5.17: Site options at Liphook and environs

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- 5.108 Starting in the **southeast** of Liphook, it is important to consider a package of adjoining sites that have been jointly promoted. This is a sensitive area from a landscape perspective, given the adjacent National Park; however, there is thought likely to be a degree of landscape capacity. One site (LIP-017) stands-out as best performing, as it relates closely to the existing urban edge, includes some existing buildings on-site and is potentially suitable from an access perspective, with the journey to the train station, and village centre beyond, via estate roads. Other sites are more constrained in landscape terms, with groundwater flood risk being a further consideration towards Haslemere Road, and there would be major access issues to address (with the two main access roads formed of narrow rural lanes). However, site promoters suggest the potential for a comprehensive scheme to address the constraints that exist.
- 5.109 Within this area is a small existing Gypsy and Traveller site, with the potential for extension (LIP-032). The extension would not be of strategic significance (less than five new pitches) but it is noted that any expansion of Gypsy and Traveller use alongside strategic residential expansion could give rise to both issues and opportunities.
- 5.110 Moving north of the railway, at the **eastern** extent of Liphook, LIP-005 and LIP-011 are two adjacent sites that potentially have some merit from a built form perspective, but which are constrained by groundwater (both sites), the River Wey Conservation Area (LIP-005; a bridleway adjacent to the site leads to a bridge over the river) and/or the adjacent railway line (LIP-011; also potentially lacking pedestrian access).

5.111 At the **north-eastern** extent of Liphook, LIP-014, is a large site that would extend a recent development, and is available for self-build and/or leisure uses, in addition to residential uses. This site is, however, constrained by the proximity of the Wealdon Heaths Phase II SPA, which is within 400m of parts of the site making these areas unsuitable for residential development. The remainder of the site is in close proximity to the River Wey Conservation Area (and therefore has heritage constraints), whilst the site as a whole is linked in a convoluted manner to the rest of Liphook, by pedestrian as well as road links

- 5.112 Continuing to the north, there are three site options at **Bramshott**, two of which are promoted for residential use, and one of which is available for a community use. The two sites proposed for residential use can be ruled out due to their relative distance from services and facilities and their inability to provide SANG to mitigate impacts on the SPA. However, the site proposed for community use (LIP-008) warrants further examination, given the current lack of community infrastructure in Bramshott.
- 5.113 Moving east, the next site reached is LIP-012, at the **northern edge** of the village. The site comprises a relatively small self-contained field which is well-screened and in close proximity to a forthcoming SANG to the west, and is within walking distance of the village centre; albeit the train station is 1.5km distant.
- 5.114 To the west of this area, in the vicinity of **Griggs Green**, and taking in the area of Old Thorns Country Estate further to the west, there are a number of sites being promoted:
 - The three largest sites (LIP-003, LIP-029 and LIP-030) are clustered around the Liphook A3 service area, and are proposed for a variety of uses, but are considered most suitable for employment. These sites are constrained by onsite woodland, some of which is locally designated (SINC), whilst access via the existing service area could prove problematic in terms of its potential impacts on the A3.
 - A cluster of small sites are being promoted for Gypsy and Traveller/residential use but all are ruled-out
 due to their proximity to the Wealdon Heaths Phase II SPA, which is adjacent.
- 5.115 Finally, there is a need to consider LIP-006, at the **southern edge** of Liphook. This site is constrained in heritage terms and townscape terms, given a likely impact on the setting and character of a listed building the south western approach to Liphook.
- 5.116 In **summary**, eight site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives see Table 5.7. The table also identifies three sites that 'stand-out' as performing notably well (relative to all sites District-wide, and given established needs for the promoted uses).

Table 5.7: Site options progressed to the reasonable spatial strategy alternatives

Site	Name	Number of new homes 'Stand-out's	
LIP-012	Land west of Headley Road, Liphook	36-40 Yes	
LIP-017	Chiltley Farm, Liphook	100 Yes	
LIP-019	Land at Old Shepherds Farm, Liphook	80-100	
LIP-020	Land at Devils Lane, Liphook	80-100	
LIP-021	Land north of Highfield Lane, Liphook	80-100	
LIP-022	Land west of Haslemere Road, Liphook	80-100	
LIP-023	Land east of Devils Lane, Liphook	80-100	
LIP-008	Land adj. to Billerica, Church Road, Bramshott	N/A	Yes
Total homes		536 - 640	

- 5.117 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:
 - the 'stand-out' sites would be delivered under any scenario (which is not to say that allocation need not be the focus of appraisal see Part 2 of this report); and
 - LIP-019, LIP-020, LIP-021, LIP-022 and LIP-023 would be delivered in combination or not at all, in order to achieve a comprehensive scheme of a scale that could mitigate/avoid adverse impacts.

Grayshott, Headley and Headley Down

5.118 Headley and Headley Down are two closely linked villages that in turn link quite closely to Lindford and Whitehill & Bordon to the west; whilst Grayshott links closely to Hindhead and Haslemere to the east, in Waverley Borough. Grayshott is located to the west of a junction of the A3, with Headley and Headley Down being more distant from the strategic road network. All three settlements are constrained in environmental terms, in particular given the proximity of the Wealden Heaths Phase II SPA, but are well-linked to the countryside by a network of public rights of way. There are limited services and facilities in this area, but Grayshott has a greater number of local shops and services.

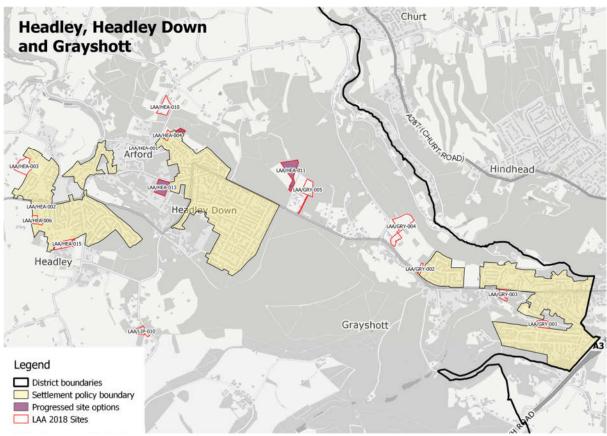


Figure 5.18: Site options at Grayshott, Headley and Headley Down

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- 5.119 Beginning at **Headley and Headley Down**, there are ten small site options in total, eight of which perform relatively poorly on the grounds of townscape / built form. Two areas are designated within the saved policies of the Local Plan as being of notable residential character, whilst other areas are associated with linear built form fronting the road. The roads permeating this area generally have limited capacity, which also introduces access/transport constraints for development. The better performing sites are HEA-013 and HEA-019, which avoid the greatest landscape/townscape/access constraints. A strategic consideration is the desire to deliver some new affordable housing to meet the long-standing unmet need in the Headley area. The former site (HEA-013) is of a sufficient size to deliver additional affordable housing and has a good landscape framework for development; although it is currently located in an area designated as a "gap" between Headley Down, Headley and Arford. The latter site (HEA-019) is a small site that is well-contained at the edge of an existing residential area, with existing (safe) road access.
- 5.120 With regard to **Grayshott**, three of the four promoted sites adjoin the existing urban area, but have access constraints and potential impacts on landscape and biodiversity interests. The fourth site (GRY-004) would extend a rural exception site at Applegarth Farm, but has a poor functional relationship with the main settlement. Proximity to the Wealdon Heaths Phase II SPA is a further consideration for GRY-001, GRY-002 and GRY-003, especially as none of these sites could provide SANG alongside residential development (NB: GRY-002 is within 400m of the SPA and would therefore be unsuitable for residential development due to the likelihood of recreational impacts on the SPA).

5.121 Finally there is a need to consider the proposal to extend the existing Travelling Showpeople site located between Grayshott and Headley Down (HEA-011). This site falls partly within the 400m buffer zone for the Wealdon Heaths Phase II SPA, but this area could largely be used for access purposes, rather than for new plots. The site is enclosed by areas of woodland which could provide appropriate screening. This site warrants further consideration, given the scale of the need for Travelling Showpeople accommodation.

5.122 In **summary**, three site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives - see Table 5.8. The table also identifies one site that 'stands-out' as performing notably well (relative to all sites District-wide, and given established needs for the promoted use).

Table 5.8: Site options progresse	ed to the reas	sonable spatial	strategy	alternatives
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Site	Name	Number of new homes	'Stand-out' site?
HEA-013	Land at Beech Hill Road, Headley	15-25	
HEA-019	Land adj. to 25 Hillside Crescent, Headley Down	12-15	
HEA-011 Land at Middle Common, Headley Down		N/A Yes	
Total homes		27 - 40	

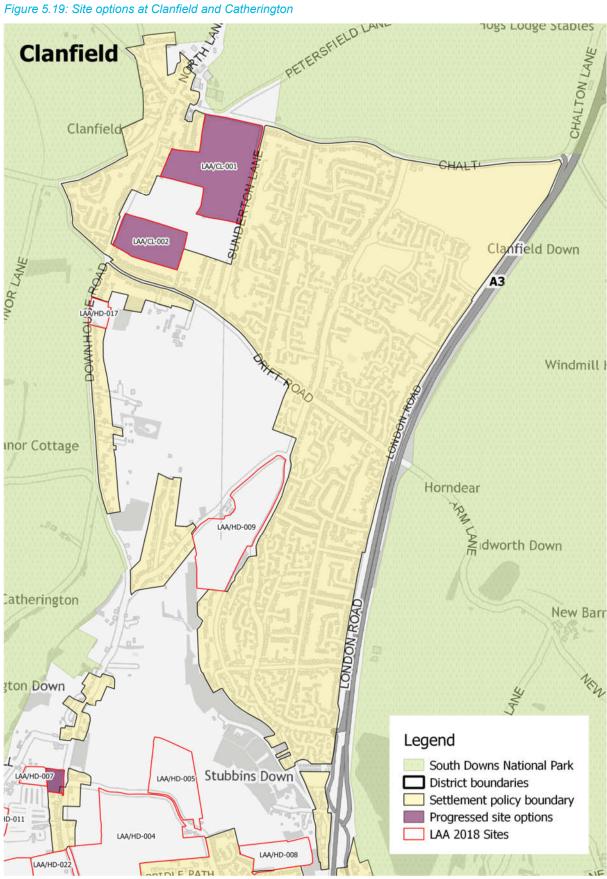
Total Homes 21 - 40

- 5.123 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:
 - the 'stand-out' site would be delivered under any scenario (which is not to say that allocation need not be the focus of appraisal see Part 2 of this report);
 - nil residential allocation is a reasonable option; and
 - HEA-013 and HEA-019 could be delivered in combination were there to be a focus on developing new
 homes in the north east; on an "either/or" basis, were development to be distributed evenly across the
 different sub-areas; or not at all if the focus for development was elsewhere in the District. This is on
 the basis that neither of these site options is outstanding in its own right.

Clanfield and Catherington

- 5.124 Clanfield, which comprises "old" and "new" settlement areas that are separated by a small area of farmland, has seen significant housing growth in recent years, with expansion to the northeast (east of Green Lane) as far as the A3. This area is well placed for access to the A3/A3(M), particularly via the Chalton Lane junction, which provides access to major employment and service centres such as Portsmouth to the south. There are, however, significant landscape constraints as a result of the local topography and the presence of the adjoining South Downs National Park to the north, east and west. There are some local services and facilities, but the settlement relies on its connections by road to other areas for secondary schools and other large-scale facilities and services.
- 5.125 Beginning with the three sites within the **northern** part of the village, the two larger sites (CL-001 and CL-002) both fall within the small area of farmland that separates the older core of Clanfield (where there is a cluster of listed buildings, but no designated conservation area) from areas of more recent development to the east. The third site at Clanfield (HD-017) is a very small site that would infill a gap in the development frontage along Downhouse Road, and now has planning permission.
- 5.126 Moving south, HD-009 is a relatively large site (9.8ha) at White Dirt Farm, and might be expected to deliver development at a scale sufficient to enable delivery of new community infrastructure; however, it is constrained in landscape terms, and its development would alter the existing pattern of development along Southdown Road, reducing the open character of land in this area and the strong rural character of White Dirt Lane.

Figure 5.19: Site options at Clanfield and Catherington



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5.127 In **summary**, two site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives - see Table 5.9. The table also identifies one site that 'stands-out' as performing notably well (relative to all sites District-wide, and given established needs for the promoted use).

Table 5.9: Site options progressed to the reasonable spatial strategy alternatives

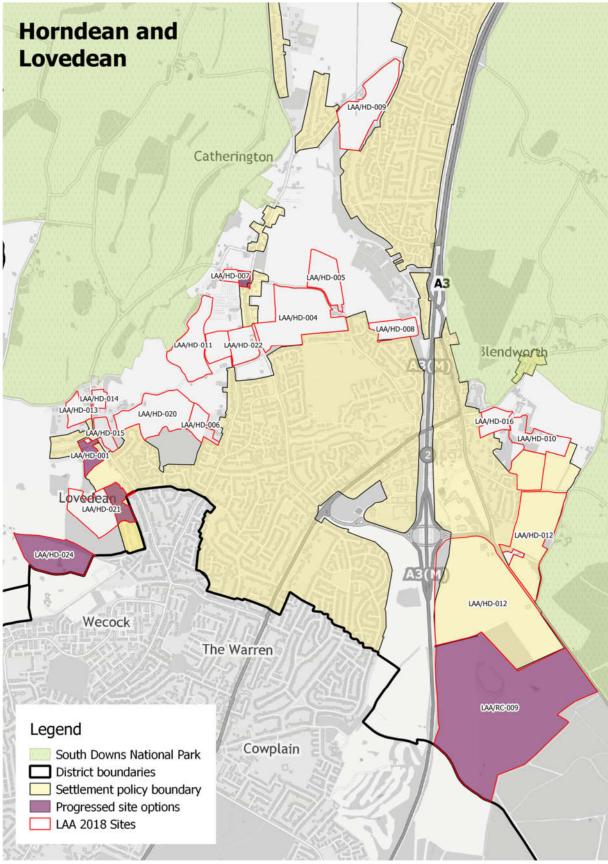
Site	Name	Number of new homes	'Stand-out' site?
CL-001	Land south of Chalton Lane, Clanfield	180	
CL-002	Clanfield County Farms, Clanfield	100	Yes
Total hor	mes	280	

- 5.128 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:
 - the 'stand-out' site would be delivered under any scenario (which is not to say that allocation need not be the focus of appraisal see Part 2 of this report);
 - CL-001 and CL-002 could be delivered in combination were there to be a focus on developing new homes in the southern parishes, subject to the inclusion of green infrastructure that would maintain a distinction between older and newer parts of Clanfield.

Horndean and Lovedean

- 5.129 The settlements of Horndean and Lovedean form the most substantial built-up area in the southern parishes sub-area. Much of Horndean has a suburban character and it forms part of a contiguous urban area with Cowplain and Waterlooville to the south. Horndean's location on the A3(M) and proximity to Portsmouth and other employment areas, as well as the presence of essential infrastructure make it an appropriate location for exploring options for further growth. Horndean provides a range of local services and facilities, including a supermarket, primary and secondary schools and some employment areas close to the A3(M), whilst Lovedean is a small village with a very limited number of local conveniences. There is no coherent retail or service hub a traditional town or District centre in either of these settlements.
- 5.130 Beginning to the east, RC-009 is a strategic site option that has already been introduced above. It would form an extension to the allocated site to the east of Horndean (see Policy HN1 of the Part 2 Local Plan; also submitted to the LAA as site HD-012), and could provide new employment land and strategic infrastructure in addition to housing. Although there are some biodiversity and flood risk considerations, the site warrants further consideration as a strategic site option able to deliver a mix of uses and new / upgraded infrastructure.
- 5.131 Moving to the north, there are two site options close to **Blendworth**. These are located within or adjoining the Blendworth Conservation Area, which has an open character at this point, and hence are ruled out on heritage grounds.
- 5.132 Moving to the west of the A3(M), there are eight site options on the **northern edge of Horndean**, all of which are constrained due to the potential for adverse effects on the Catherington Conservation Area, or on landscape character given the rising topography, proximity to the South Downs National Park and views from the local network of narrow lanes, footpaths and bridleways. There is also a double row of electricity pylons passing through this area, which could represent a significant design constraint. The largest site option (HD-004) has been promoted for c.200 new homes, and hence might be of sufficient scale to deliver some new community infrastructure, but this area provides a visual break between Horndean and the Catherington Conservation Area, particularly as experienced from Five Heads Lane.
- 5.133 One site set apart from the rest is HD-002, which has been identified as having potential for small-scale residential development that is in-keeping with the ribbon of housing to the west of Catherington Conservation Area.

Figure 5.20: Site options at Horndean and Lovedean



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- 5.134 Moving to the west, ten site options are located on the edge of **Lovedean**:
 - To the east of the cluster, HD-020 and HD-006 could lead to adverse impacts on the adjacent ancient woodland (Yoells Copse), further isolating this SINC from other habitats. Development could also be highly visible from the Monarch's Way long-distance path.
 - Moving to the west, there is some potential to accommodate development in built form terms; however, there is a need to apply caution given that Lovedean Lane is something of a gateway to the National Park, which begins a short to distance to the north. There are also access constraints in this area, due to the very narrow and rural character of the local roads connecting with Lovedean Lane and Catherington Lane. There may, however, be some potential for residential development at HD-001 and HD-019, which take access from Lovedean Lane, and where existing areas of development along with topography and/or green infrastructure could help to integrate new housing without adverse landscape/visual impacts.
 - A final cluster of two larger sites, which are located to the southwest of Lovedean, both have a degree of merit in built form / landscape terms. However, site HD-021, which includes the abovementioned HD-019, but extends further to the west towards areas of woodland, can be ruled-out on the basis of the potential impacts of development on adjoining biodiversity designations (SINCs including ancient woodland). Although the remaining site (HD-024) also adjoins the ancient woodland at James' Copse, this site could form part of a comprehensively planned urban extension to Havant (it adjoins another development site within the Havant Borough Council area). This means that there is greater potential for avoiding adverse impacts on the ancient woodland through an appropriate design and layout.
- 5.135 In **summary**, two site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives see Table 5.10. The table also identifies two sites that 'stands-out' as performing notably well (relative to all sites District-wide, and given established needs for the promoted use).

Table 5.10: Site options progressed to the reasonable spatial strategy alternatives

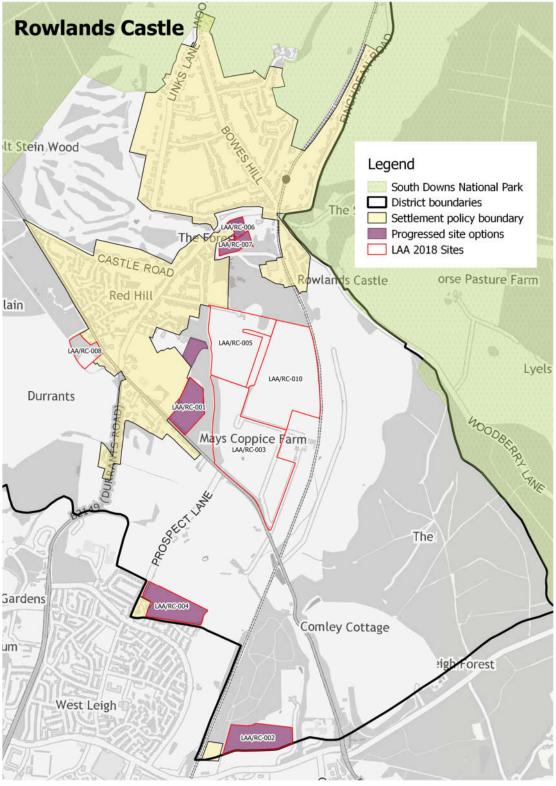
Site	Name	Number of new homes 'Stand-out' sid	
HD-019	Land at Cottage Farm, north of James Copse Close	75-85	Yes
HD-024	Woodcroft Farm, Horndean	170-180	Yes
HD-001	Land rear of 191-211 Lovedean Lane, Horndean	33	
HD-002	Parsonage Farm, Catherington Lane	5	
RC-009 Hazleton Farm South, Horndean		800-1000	
Total hon	nes	1,083 - 1,303	

- 5.136 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:
 - the 'stand-out' sites would be delivered under any scenario (which is not to say that allocation need not be the focus of appraisal see Part 2 of this report); and
 - under any scenario it is appropriate to deliver additional housing at Horndean/Lovedean, in the context
 of the need to deliver housing in the PUSH area and this being the largest urban area; and on balance
 it is considered appropriate to compare and contrast the alternatives of A) small-scale additional
 housing through sites HD-001 and HD-002; versus B) substantial additional housing at strategic site
 RC-009. This is on the basis of known strategic constraints concerning the potential impacts of
 development on groundwater (see appraisal of options under the SA water topic for details).

Rowlands Castle Parish

5.137 As a settlement, Rowlands Castle is largely self-contained from areas to the south and west, with little perceptual relationship to areas of Havant, and to Horndean and the A3(M). Rowlands Castle has the only mainline railway station in the sub-area as well as a frequent bus service, a primary school and a small range of local amenities. However, development potential is constrained by the setting of the South Downs National Park, and an important groundwater source protection zone associated with the water supply for the Portsmouth area. A further constraint is the presence of protected Bechstein's bats in the landscape.

Figure 5.21: Site options at Rowlands Castle Parish



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- 5.138 In the context of the constraints mentioned above:
 - site options to the **eastern side** of the settlement are considered significantly constrained in respect of landscape and water resources, given the presence of the Bedhampton Springs in this area;
 - smaller site options that are located closer to the village centre (RC-006 and RC-007) give rise to
 fewer such concerns, and benefit from proximity to local services including the railway station,
 however there are potential impacts on a scheduled ancient monument that is located in close
 proximity to the east;
 - to the south of the village centre, RC-001 would involve an extension to Land South of Oaklands (Policy RC2 in the Part 2 Local Plan), and is supported given that the site is well-screened in the wider landscape and is reasonably well-connected to local services at Rowlands Castle; and
 - to the west, RC-008 is separated from the village and from facilities and services by a busy road. It
 does not relate well to the settlement and includes an extensive copse of trees, much of which is
 protected by a tree protection order.
- 5.139 Finally, there are two further site options (RC-002 and RC-004) located on the **edge of Havant** (similar to HD-024 and its relationship to Cowplain, which has already been discussed above, under 'Horndean and Lovedean') within the parish of Rowlands Castle. Both sites perform notably well on the basis that they are subject to limited constraints (although RC-002 adjoins ancient woodland) and have good access onto the suburban road network and in turn to services, facilities and employment opportunities in Havant.
- 5.140 In **summary**, five site options warrant further consideration through the appraisal of reasonable spatial strategy alternatives see Table 5.11. The table also identifies three sites that 'stand-out' as performing notably well (relative to all sites District-wide, and given established needs for the promoted use).

Site	Name	Number of new homes	'Stand-out' site?
RC-001	Land at Oaklands House	50	Yes
RC-002	Land north of Bartons Road	50-60	Yes
RC-004	Land south of Little Leigh Farm	100-115	Yes
RC-006	Land at Deerleap (north)	8-12	
RC-007	Land at Deerleap (south)	10-20	
Total hom	es	218 - 257	

- 5.141 With regards the question of how these sites might be delivered **in combination**, it is reasonable to assume that:
 - the 'stand out' sites would be delivered under any scenario (which is not to say that allocation need not be the focus of appraisal see Part 2 of this report); and
 - RC-006 and RC-007 should be delivered in combination, were there to be a focus on developing new
 homes in the southern parishes, in order to achieve a comprehensive scheme of a scale that could
 mitigate/avoid adverse impacts and provide additional affordable housing. However there is the option
 of delivering neither, to avoid potential impacts on the scheduled ancient monument.

Establishing the reasonable alternatives

Introduction

5.142 The aim of this section is to establish a discrete range of reasonable spatial strategy alternatives for the District as a whole, i.e. alternative approaches to land supply, which in practice means alternative packages of site allocations (recognising that certain elements of land supply are already established, i.e. housing completions and commitments, whilst other elements can be taken as something of a 'given', i.e. rolled forward allocations and a windfall assumption - see para 5.19).

5.143 Reasonable spatial strategy alternatives are established within this section drawing upon the list of "site options progressed to the reasonable spatial strategy alternatives" and "reasonable assumptions" listed at the end of each of the settlement discussions above.

The reasonable spatial strategy alternatives

5.144 The first feasible option to consider is the option of allocating all shortlisted sites - see Table 5.12. However, this option can be dismissed as unreasonable, as it would involve provision for a quantum of homes far in excess of that needed in order to meet established needs. To recap, there is a need to allocate sites to deliver a minimum of 2,726 homes.

Table 5.12: Capacity of all site options progressed to the reasonable spatial strategy alternatives, by settlement

Settlem	Settlement / area Number of homes		
p	Alton & environs	1,316 - 1,715	
orrid	Bentley & environs	850 - 870	
A31 Corridor	Four Marks & Medstead	130 - 150	
	Ropley & Ropley Dean	55 - 76	
_	Whitehill & Bordon & environs	1,544 - 1,813	
North East	Liphook & environs	536 - 640	
	Grayshott, Headley & Headley Down	27 - 40	
r.r es	Clanfield and Catherington	280	
Southern Parishes	Horndean & Lovedean	1,083 - 1,303	
So	Rowlands Castle Parish	218-257	
Total ca	pacity for new homes	5,759 - 7,144	

- 5.145 Even after having ruled-out the 'max growth' option as unreasonable, and taken account of the various "reasonable assumptions" listed in the settlement specific discussions above, there remains a very large number of feasible combinations of site options.
- 5.146 As a first port of call, it was considered reasonable to explore spatial alternatives involving 'max growth' at one sub-area (see Table 5.12), aligned with lowest growth at the other two sub-areas, where 'lowest growth' is defined taking into account the various "reasonable assumptions" listed in the settlement specific discussions above. The resulting three spatial strategy alternatives are 'reasonable', in that they would deliver a reasonable quantum of housing, with one exception. Specifically, the option involving "max growth in the A31 sub-area aligned with lowest growth elsewhere", which would involve delivery of too many homes (including two new settlements, which could give rise to issues for housing delivery within the sub-area). As such, the decision was taken to modify this option by removal of the Northbrook Park new settlement area of search. This led to following three reasonable spatial strategy alternatives:
 - Option 1 Max growth in A31 Corridor Northbrook Park + lowest growth elsewhere.
 - Option 2 Max growth in North East + lowest growth elsewhere.
 - Option 3 Max growth in Southern Parishes + lowest growth elsewhere.

5.147 Finally, the decision was taken to establish a fourth option, to include allocation of Northbrook Park. With regards to the question of which other sites should be allocated, the decision was taken to support: lowest growth in the Southern Parishes, Alton, and Liphook; aligned with max growth at Four Marks and Ropley / Ropley Dean, Whitehill & Bordon and Headley / Headley Down. In effect, **Option 4** is a "hybrid" option that sits between focusing growth in the north east and focusing growth in the A31 corridor. Northbrook Park is positioned close to the A31 corridor / north east sub-area boundary, so an option involving Northbrook Park as a strategic site option "fits" with the idea of focusing development in both the A31 corridor and north east sub-areas.

- 5.148 Note that all options that have been chosen as reasonable alternatives for the local plan share the family resemblance that the sub-area(s) identified as involving "max"/"higher" growth always include the development of a strategic site option in that/each of those sub-area(s).
- 5.149 In **conclusion**, four reasonable spatial strategy alternatives were arrived at, which are presented across the two tables below, and then across the subsequent maps. Table 5.13 lists the sites allocated under each option, serving to highlight those that are a 'constant' across the reasonable alternatives, versus those that are a 'variable'. Table 5.14 then presents the reasonable alternatives in full, demonstrating how each would provide for "the housing requirement plus a buffer" or, in the case of Option 4 potentially provide for a higher growth strategy (see discussion of 'Housing quanta' considerations above).
 - N.B. the Table 5.13 reflects an assumption that each site will deliver the maximum number of homes from the range of figures presented in Table 5.12, and the preceding settlement-specific tables.

Table 5.13: Sites allocated under each of the spatial strategy alternatives, with 'variable' sites in **bold** and non-housing including Gypsy and Traveller and Travelling Showpeople) allocations <u>underlined</u>

		Option 1 High growth in the A31 Corridor	Option 2 High growth in the North East	Option 3 High growth in the Southern Parishes	Option 4 High growth in the A31 Corridor and North East
	Alton & environs	AL-015, <u>025</u> , CHA- <u>002</u> , <u>003</u> , CHA-005 , <u>006</u> , BEE-004	AL-015, <u>025,</u> CHA- <u>002,</u> <u>003</u> , AL-005	AL-015, <u>025,</u> CHA- <u>002,</u> <u>003</u> , AL-005	AL-015, <u>025</u> , CHA- <u>002,</u> <u>003</u> , AL-005
A31 Corridor	Bentley & environs	BEN-005, 012	-	-	-
	Four Marks & FM- <u>010</u> , <u>023</u> , <u>024</u> , FM- Medstead 013 , 001		FM- <u>010</u> , <u>023,</u> <u>024</u> ,	FM- <u>010</u> , <u>023,</u> <u>024</u> ,	FM- <u>010</u> , <u>023</u> , <u>024</u> , FM- 013
	Ropley & Ropley Dean	ROP-002, 010	-	-	ROP-002, 010
ıst	Whitehill & Bordon & environs	HEA-018, WHI-004, 005, <u>006</u> , <u>007</u> , 009, 010, 011, <u>012</u> , 013, 014, <u>015</u> , 016, 017	HEA-018, WHI-004, 005, <u>006</u> , <u>007</u> , 009, 010, 011, <u>012</u> , 013, 014, <u>015</u> , 016, 017, WHI-008, LIP- 024, 025	HEA-018, WHI-004, 005, <u>006</u> , <u>007</u> , 009, 010, 011, <u>012</u> , 013, 014, <u>015</u> , 016, 017	· · · · · · · · · · · · · · · · · · ·
North East	Liphook & environs	<u>LIP-008,</u> 012, 017	<u>LIP-008</u> , 012, 017, LIP- 019 , 020 , 021 , 022 , 023 , 008	<u>LIP-008,</u> 012, 017	<u>LIP-008</u> , 012, 017
	Grayshott, Headley & H' Down	HEA-011	HEA-011, HEA-013, 019	HEA-011	HEA-011, HEA-013, 019

		Option 1 High growth in the A31 Corridor	Option 2 High growth in the North East	Option 3 High growth in the Southern Parishes	Option 4 High growth in the A31 Corridor and North East
Southern Parishes	Clanfield & Catherington	CL-002	CL-002	CL-002, CL-001	CL-002
	Horndean & Lovedean	HD-019, 024, HD-001, 002	HD-019, 024, HD-001, 002	HD-019, 024, RC-009	HD-019, 024, HD-001, 002
	Rowlands Castle Parish	RC-001, 002, 004	RC-001, 002, 004	RC-001, 002, 004, RC- 006, 007	RC-001, 002, 004

Table 5.14: The reasonable spatial strategy alternatives

Hou	sing supply	Option 1 High growth in the A31 Corridor	Option 2 High growth in the North East	Option 3 High growth in the Southern Parishes	Option 4 High growth in the A31 Corridor and North East
Con	npletions ¹³	791	791	791	791
Planning permissions ¹⁴		5,947	5,947	5,947	5,947
Roll	ed forward allocations ¹⁵	tions ¹⁵ 165 165 165			165
Win	dfall ¹⁶	992	992	2 992 992	
	Alton & environs	1,460	455	455	455
	Bentley & environs	70	-	-	800
	Four Marks & Medstead	150	-	-	150
4	Ropley & Ropley Dean	76	-	-	76
Allocations ¹⁷	Whitehill & Bordon & environs	1,475	1,813	1,475	1,813
	Liphook & environs	140	640	140	140
₹	Grayshott, Headley & H' Down	-	40	-	40
	Clanfield & Catherington	100	100	280	100
	Horndean & Lovedean	303	303	1,265	303
	Rowlands Castle Parish	225	225	257	225
Tota	al dwellings 2017-2036	11,894	11,471	11,767	11,997
Ave	rage dwellings per annum	626	604	619	631
% o	ver housing requirement (550 dpa)	14%	10%	13%	15%
Oth	er supply				
Con	stant	Employment, Gy	psy and Travelle Comr	rs, Travelling Sho nunity	wpeople, SANG,
Additional		Employment, Hotel	Employment	Employment	Employment

¹³ Homes built since the start of the plan period

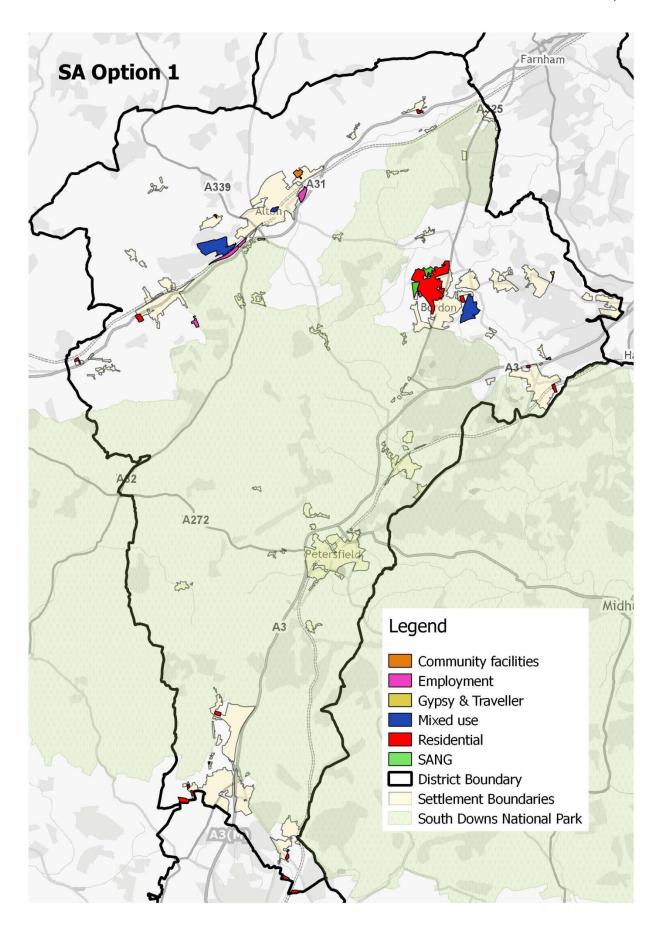
Part 1 49

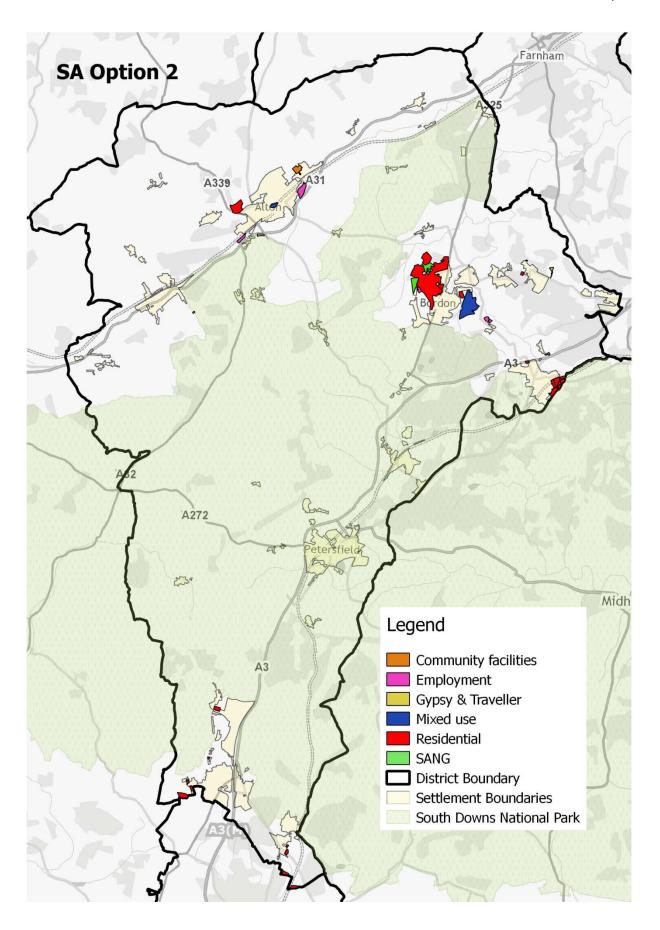
Homes set to be built at sites with planning permission (either outline or full)

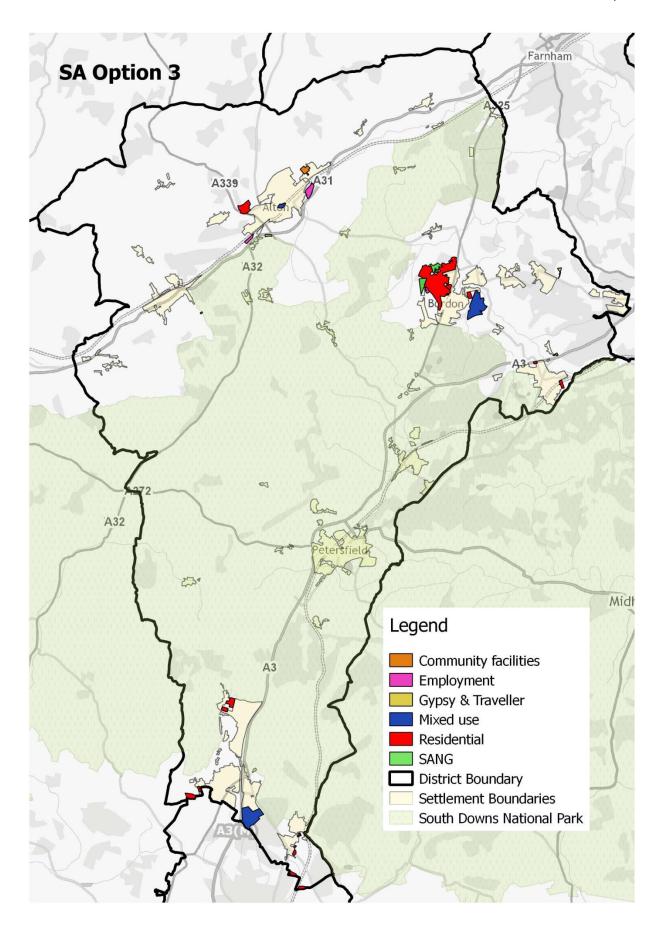
Homes proposed to be built at sites that are an existing allocation without planning permission

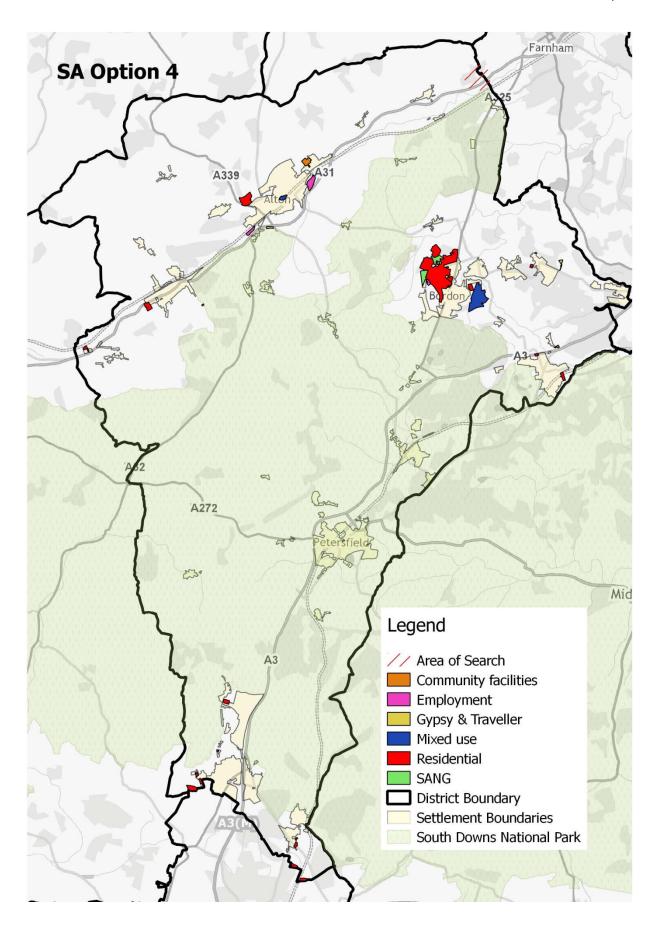
Homes built at sites not allocated in the plan, but which are in accordance with policy (primarily within settlement boundaries)

To reiterate, figures reflect an assumption that each site will deliver the maximum number of homes from the range of figures presented in Table 5.12, and the preceding settlement-specific tables.









6. Appraisal of the reasonable alternatives

Introduction

6.1 The aim of this chapter is to present appraisal findings in relation to the reasonable alternatives introduced above. Detailed appraisal findings are presented in Appendix IV.

Summary alternatives appraisal findings

- 6.2 Table 6.1 presents summary appraisal findings in relation to the four alternatives introduced above, namely:
 - Option 1 High growth in the A31 Corridor
 - Option 2 High growth in the North East
 - Option 3 High growth in the Southern Parishes
 - Option 4 High growth in the A31 Corridor and North East
- 6.3 Detailed appraisal methodology is explained in Appendix IV, but in summary:

Within each row of the table (i.e. for each of the topics which comprise the SA framework) the columns to the right hand side seek to both A) rank the alternatives in order of relative performance; and B) categorise the performance of each option in terms of 'significant effects' (using **red** / **green**).¹⁸

¹⁸ Red is used to denote a predicted 'significant negative' effect, whilst **green** is used to denote 'significant positive' effect. N.B. more detailed effect characteristics are described as part of the detailed appraisal presented in Appendix IV.

Table 6.1: Summary of spatial strategy alternative findings (rank and effect categorisation)

	Option 1	Option 2	Option 3	Option 4
	High growth in the A31 Corridor	High growth in the North East	High growth in the Southern Parishes	High growth in the A31 Corridor and North East
Biodiversity	2	3	\Rightarrow	4
Climate change adaptation	*	2	3	3
Climate change mitigation	$\stackrel{\wedge}{\cancel{\sim}}$	2	3	4
Community and wellbeing	\bigstar	3	3	2
Economy and employment	\Rightarrow	*	3	2
Heritage	=	=	=	=
Housing	2	3	2	\bigstar
Landscape and townscape	3	\Rightarrow	2	3
Resources	3	\bigstar	\bigstar	2
Water	\Rightarrow	\Rightarrow	2	\Rightarrow

Summary and conclusions

The above table shows that none of the reasonable alternatives for the East Hampshire Local Plan 2017-2036 is significantly better than the rest, against each and every SA objective. However, the options can often be differentiated in terms of the SA objectives, with Option 1 (high growth in the A31 corridor) often performing "better" than the others, except in terms of the effects of development on local landscapes, townscapes and resources. At the other end of the scale, Options 3 and 4 are most frequently "the worst performing options". However, this is an unduly simplistic assessment and it is important to understand more about the differences in ranking against specific SA topics.

The potential effects of the reasonable alternatives are not thought be significant for the SA topics of climate change mitigation, community and wellbeing, and resources. The reasons for these judgements are given in Appendix IV, but reflect the current limitations of reasonable alternatives for the plan's spatial strategy at realising positive effects of sufficient magnitude, in the case of the topics of climate change mitigation and community and wellbeing; or the fact that the spatial extent of potential negative effects is likely to focus on less valuable/vulnerable areas, in the case of the SA topic of resources.

Some of the significant effects that have been identified for the reasonable alternatives are positive in as much as they are potentially in accordance with, and help to further one or more of the SA objectives; whilst others are negative in as much as they potentially conflict with some of those same objectives. In all instances, it should be recalled that the Council is still in the early stages of plan-making so there are many things, such as the design and layout of new development, that are wholly unknown but which are important for identifying the significance of potential effects. At this time, the potential effects that have been identified are often uncertain, but predicted on the basis of matters of principle, taking a precautionary approach where significant adverse effects *could* result from development. A further iteration of the SA Report, to accompany a future pre-submission (Regulation 19) version of the local plan, will identify potential significant effects with greater certainty.

The significant negative (adverse) effects that have identified through the appraisal process concern the SA topics of biodiversity, heritage, landscape and townscape, and water. These predictions reflect the "worst case scenario" where development measures to mitigate or avoid effects prove insufficient. In this context, and when there is a difference in the performance of the options, it is noteworthy that the effects for Options 1 and 2 are considered to be less negative than those for Option 4; which means that these options have a lower risk, or may generate adverse effects of a lower severity than Option 4 in terms of certain SA topics. For example, Options 1 and 2 distribute less housing to areas in close proximity to biodiversity sites of international and national importance, and they could therefore better avoid or reduce the effects of development and/or associated recreational activity on areas of biodiversity value. Overall, Option 4 is the option that could result in the most geographically wide-ranging effects on areas protected for their biodiversity interest, and could also result in harm to the rural landscapes of the District (particularly in the A31 corridor). By contrast, Option 3 is considered to offer the lowest risk to sites of biodiversity importance of all the options; and also performs better than Options 1 and 4 with regard to the potential for negative adverse effects on landscapes and townscapes, by focusing development in areas that are generally less sensitive, taking account of the South Downs National Park. Option 3 could nonetheless have the greatest negative impacts on water quality, with potential knock-on effects for the natural environment (SACs, SSSIs, SPAs in the Solent area due to wastewater outflows) and for human health (i.e. by affecting drinking water quality).

It should be stressed at this stage that significant adverse effects have been identified in principle, but that there are also many ways of avoiding such adverse effects through good planning and design.

In addition to the potential for adverse effects, all of the options could – to a greater or lesser extent – have positive effects in terms of certain SA topics. For example, development in accordance with Options 3 and 4 (amongst others) could have significant positive effects in terms of the SA topics of housing and (particularly for Option 4) economy and employment. Option 4 would provide the largest number of new homes of any of the options and is more likely to deliver substantial quantities of affordable housing, whilst distributing new employment-related development to strategically significant locations (Whitehill & Bordon and the A31 corridor). Option 3 could address, to a more significant extent than others, the recognised shortfall in housing provision in the Portsmouth Housing Market Area. Options 1 and 2 perform well in respect of limiting the exposure of future residents to the potential effects of climate change, by distributing development away from areas of flood risk; these are significant positive effects in as much as the distribution has the potential to create more resilient communities in the face of likely future environmental challenges. Option 1 and 2 could also have significant positive effects for local economy and employment levels, whilst Option 1 also performs reasonably well in terms of providing a large number of new homes and for providing suitable opportunities for the development of affordable housing.

Clearly the overall picture is nuanced, with Option 4 performing in a strongly positive but also a strongly negative fashion against different SA topics, whilst Option 3 shows the opposite general characteristics of performing in a weakly positive and a weakly negative fashion. Option 2 performs well against topics with significant adverse effects but shows a mixed performance against topics with significant positive effects. Option 1, as already mentioned, might appear to be the "best option" as it performs strongly against SA topics with significant positive effects, but also limits the severity of negative effects and thus performs well against topics with significant adverse effects; however, even in this case, it is important to note the option's relatively weak performance for maintaining and enhancing the landscapes and townscapes of East Hampshire. In the context of these outcomes, a simple overall ranking of the options would be inappropriate, as this would require judgements to be made between the relative importance of the SA topics; judgements that would reflect policy choices and not simply concern the objective matters of fact. Therefore, at this interim and early stage in the plan-making process all of the options demonstrate relative advantages and disadvantages for sustainable development and it is for the Council to conclude on "the best" option for its local plan.

7. Developing the preferred approach

Introduction

7.1 The aim of this Chapter is to present the response of East Hampshire District Council to the alternatives appraisal / reasons for developing the preferred approach in-light of the alternatives appraisal. The Council has chosen Option 4 (with a slight modification), as explained below.

The Council's reasons

- 7.2 The emerging local plan offers the Council an opportunity to review progress on the current local plan, comprising the Joint Core Strategy (adopted June 2014), the Part 2 Local Plan (adopted April 2016), and its spatial strategy for development until 2028. An important element of the current spatial strategy is the regeneration of the former Bordon Garrison at Whitehill & Bordon, to provide a new town centre, business premises, community facilities, open space (including significant natural greenspace) and more than 2,700 new homes. As mentioned previously, the regeneration of Whitehill & Bordon is currently being implemented and it is important for the Council to continue to support its delivery. In this context, the Council is mindful that appraisals for all four of the options suggest that a continuation of this strategic approach could have townscape and heritage benefits for Whitehill & Bordon, whilst also ensuring local accessibility to local jobs and training opportunities.
- 7.3 The allocation of additional development sites in/around Whitehill & Bordon could help to facilitate further regeneration of the town, by providing more than sufficient Suitable Alternative Natural Greenspace (SANG) to avoid recreational impacts on the Wealden Heaths Phase II SPA. Additional housing development could also better support the vitality and viability of the new town centre, by providing a larger local customer base. Nevertheless, the Council recognises that by focusing the majority of housing development in the north east (Option 2), this would provide fewer opportunities for buying or renting housing in other parts of the District. Option 2 does not perform as well as other options in terms of the Housing topic of the SA, which is of particular concern for the Council, given that the provision of land for over 2,700 additional new homes (i.e. beyond what has been delivered since 2017, is currently planned/has planning permission, or is likely to come forward as windfall) will be an important function of the emerging local plan. A wide distribution of new housing opportunities across East Hampshire (outside of the South Downs National Park) is also important to help deliver new affordable homes in all sub-areas.
- 7.4 The importance of delivering new housing opportunities places a focus on Options 1, 3 and 4, all of which could deliver more new homes than Option 2. Although every option could deliver the objectively assessed need for housing one of the reasons why each option is reasonable there is some risk that additional unmet needs from adjoining local authority areas could be identified at later stages in the planmaking process. More importantly at this stage, the Council will need to ensure that a five-year supply of housing would be met throughout the entire plan period, for the sake of positive planning and meeting the requirements of the Government's Housing Delivery Test. A large amount of the housing requirement to 2036 will be delivered through existing commitments (especially existing planning permissions which will be developed in the early years), and so reasonable alternatives for the spatial strategy must be capable of delivering significant numbers of new homes later in the plan period. This, together with the outcomes from the SA appraisal against the housing topic, suggests that Options 1, 3, and 4 are currently in a stronger position to provide a spatial strategy that will meet all of the requirements of the NPPF.
- 7.5 The Council also notes the economic benefits that have been identified for Options 1 and 4, which would involve new employment land associated with new settlement options and Chawton Park Farm and Northbrook Park respectively. Option 3 has been ranked slightly less positively in terms of its economic and employment-related effects as it would appear more likely to support out-commuting to jobs and training opportunities elsewhere (in Portsmouth and the wider Solent area) rather than providing substantial opportunities to address job/training needs internally, within East Hampshire. The Council considers this a weakness of Option 3 for purposes of choosing a sustainable spatial strategy. Options 3 and 4 are also considered to be less positive than the other two options in terms of enabling future development to adapt to the effects of climate change, principally with respect to avoiding the impacts of flooding. The Council considers these to be potential weaknesses, but notes that this is an early stage of the plan-making process and the options for mitigation of flood risk have not been fully explored.

7.6 In addition to the potential for the abovementioned positive significant effects, the Council has also been mindful of the outcomes from the appraisal that suggest potential for significant adverse effects arising from new development in accordance with the options.

- 7.7 The significant potential effects on the District's biodiversity often concern areas that are internationally or nationally designated for their biodiversity importance; for example, the Wealden Heaths Phase II Special Protection Area. It is recognised that the SA takes a precautionary approach in its assessment, which is apt in the context of this early stage of plan-making, when details such as the design and layout for new development on promoted sites are neither clear nor firmly committed. Nevertheless, the Council has a good record in ensuring the delivery of mitigation measures to avoid impacts on biodiversity assets, as exemplified through the regeneration at Whitehill & Bordon, which includes substantial areas of SANG at Bordon and Hogmoor inclosures. The Council anticipates that, through working with stakeholders, it would be in a strong position to avoid impacts arising from new development in sensitive areas and to this end, the emerging local plan includes strong policies for the protection of the natural environment. Opportunities for the mitigation of impacts on biodiversity are also indicated in the SA of the reasonable alternatives and these could be investigated and implemented, where feasible. Taking account of all of this, the Council believes that Options 3 and 4 could, if developed in accordance with robust planning policies, take advantage of the opportunities to facilitate the delivery of green infrastructure enhancements to the northern Wey Valley (Option 4) or to the Havant Thicket Reservoir area (Option 3); and that this could have biodiversity benefits. Opportunities for improving habitat connectivity at Chawton Park Farm (Option 1) are also noted, but these must be qualified by the potential for increased recreational/development-related disturbance on large parcels of ancient woodland in this area.
- 7.8 Potentially significant adverse effects on heritage have also been identified through the SA, but it is noted that all of the options raise these issues, due to potential impacts on conservation areas, listed buildings and the transformational effect that development could have on their settings. The SA has ranked all options equally, so this topic is not decisive in selecting an option for the spatial strategy of the local plan. Once again, the emerging draft local plan includes robust policies to conserve and enhance local heritage, so the Council is confident that through working with stakeholders, potential adverse impacts can be avoided or mitigated.
- 7.9 Landscape and townscape is another SA topic that is of concern, given the identified potential for significant adverse effects and the fact that East Hampshire contains part of the South Downs National Park. This is an area which is described as having "the highest status of protection" in relation to the issues of conserving and enhancing landscape and scenic beauty (paragraph 172, NPPF). Options 1 and 4 are recognised as having the potential for adverse, transformational effects on the rural landscapes of the A31 corridor/the northern Wey Valley, whilst both Chawton Park Farm (Option 1) and Northbrook Park Area of Search (Option 4) are in close proximity to the South Downs National Park. Nevertheless, the Council considers that new settlements present opportunities to achieve the highest standards of design and the most sustainable development layouts. It is also noted that the SA identifies landscape features that could provide a context for development in the case of both Northbrook Park and Chawton Park Farm.
- 7.10 Mindful of the SA results for the landscape topic, the Council considers that there are additional contextual factors affecting how these results are interpreted, for the sake of informing the local plan's spatial strategy. Option 3 is ranked higher in the SA than Options 1 or 4 under the landscape topic, largely due to potential for the promoted second phase of Land East of Horndean (LAA reference: RC-009) to connect with the site that is currently allocated in the Part 2 Local Plan (reference: HN1); and because the site (RC-009) has some visual containment that could reduce impacts on the South Downs National Park. However, the Council is concerned about the risks of creating urban sprawl in this area. The allocated site and the newly promoted extension might not be developed to provide a coherently planned eastward extension to Horndean, because these sites are at very different stages in the planning process and there is no firm commitment on the part of the development interests to reconsider the area as a whole, to achieve the most sustainable new settlement option. Unless and until this context for development changes (e.g. through consultation responses to the draft local plan), the Council considers that the risk of a large-scale development that is unsustainable in landscape/townscape terms i.e. a sprawling development that lacks a defined centre and therefore a sense of place is prohibitive for advancing with Option 3.

7.11 The final SA topic against which the potential for significant adverse impacts has been identified is that of water. The Council is mindful of the potential for significant adverse effects on water quality arising from Option 3, which constitutes a reason for being circumspect over the quantity of new housing to be delivered in the southern parishes sub-area (the parishes of Clanfield, Horndean & Rowlands Castle). The potential for restricted water supply in the northern areas of the District is also noted, but because there are ways of mitigating this through the design of new development, which can promote sustainable water use, and because any shortfalls would be beyond the plan period; this is of lesser concern for a spatial strategy. The Council is working with other PUSH authorities to identify a way forward to the forthcoming difficulties with demonstrating compliance with water quality objectives in the Solent area and is confident that a satisfactory way forward will be found for new development. However, there is a risk to the timely delivery of new housing, if new water treatment/drainage network infrastructure is required, or if new catchment management solutions need to be devised and implemented, in order to address any problem that needs to be resolved.

- 7.12 Taking both the significant positive and negative effects into account, the Council considers that Option 4 is, at present, the most sustainable basis for its spatial strategy for the emerging draft local plan. Option 1 is also judged to have significant merits, but ultimately the Council is less convinced that this option can deliver biodiversity enhancements as part of its proposed new settlement at Chawton Park Farm; and would prefer to offer more support to on-going regeneration efforts at Whitehill & Bordon (Option 4 involves a greater quantity of new housing in the Whitehill & Bordon area than Option 1). Option 4 would also deliver the greatest quantity of new homes, in a more widely dispersed fashion, which is of great importance in the context of the national need to "fix our broken housing market". Option 3 is not as widely regarded because of the weaknesses identified above in connection with the potential for a less coherent development (and its consequent impacts on local the local landscape/townscape) and also because of concerns relating to the potential impacts of development on water quality. Option 2, whilst in some ways attractive because of its support for regeneration at Whitehill & Bordon, simply does deliver enough new homes or across a wide enough area to satisfy the Council in the context of the alternatives and the potential for unmet housing needs to emerge later in the plan-making process.
- 7.13 Although Option 4 is a good basis for the spatial strategy, it is not accepted in its entirety. The Council takes decisions on the basis of evidence but also considers this evidence in light of local priorities for future development. The SA has identified that in landscape/townscape terms, there is potential for one LAA site option (HEA-013) that forms a part of Option 4 to be developed to result in a perceptual narrowing of the gap, or even coalescence, between Headley Down and Arford. This is of great local concern, because the open and dispersed character of development in this area of the District makes any intervening areas of undeveloped land of particular importance for maintaining the identity of distinct settlements. The Council considers that this site should therefore be excluded from the spatial strategy of its draft local plan. Accordingly, the Council is consulting on a draft local plan that corresponds to Option 4 with regard to its spatial strategy, minus the site option of HEA-013 (Land at Beech Hill Road, Headley).

Part 2: What are the appraisal findings at this stage?

8. Introduction to Part 2

8.1 The aim of this part of the report is to present an appraisal of the Draft Local Plan as a whole.

Appraisal methodology

- 8.2 The appraisal identifies and evaluates 'likely significant effects' of the Draft Local Plan on the baseline, drawing on the sustainability topics/objectives identified through scoping (see Table 3.1) as a methodological framework.
- 8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and an understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility to the non-specialist). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Proposed Submission Plan in more general terms.
- 8.4 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004). So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Local Plan to impact on the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

Adding structure to the appraisal

- 8.5 Whilst the aim is essentially to present an appraisal of the Draft Local Plan 'as a whole', it is appropriate to also give stand-alone consideration to elements of the plan. As such, each of the appraisal narratives is broken-down under sub-headings.
 - N.B. Specific policies are referred to only as necessary within the narratives below. It is not necessary to give systematic consideration to the merits of every plan policy in terms of every sustainability topic/objective.

9. Assessment of the Draft Local Plan

Introduction

The aim of this chapter is to present an appraisal of the draft plan under the ten SA themes, drawing on the issues and objectives established through scoping (see Table 3.1).

Biodiversity

Commentary on spatial strategy

Policy S1

- 9.2 A key consideration is the need to avoid significant adverse effects on the Wealden Heaths Phase II Special Protection Area (WH2SPA), parts of which are located within the District. There are also a number of additional SPA constraints to be taken into account as sites across the District fall (partially) within one of the 5km/5.6km buffer zones for the Wealdon Heaths Phase I SPA, the Thames Basin Heath SPA (TBHSPA) or the Chichester and Langstone Harbours SPA (CLHSPA). It is therefore be important to direct development to less sensitive locations beyond the defined buffers and also ensure that there is potential to deliver sufficient Suitable Alternative Natural Greenspace (SANG) to mitigate increased recreational pressure.
- 9.3 Policy S1 (Quanta and location of development) says that the north-east area "will see the most significant housing growth" including "focussing additional housing at Whitehill & Bordon". Much of Whitehill & Bordon is in close proximity to the WH2SPA; however, the plan proposes allocation of substantial new strategic SANG at the town to avoid significant effects. Policy S1 also notably:
 - says that housing growth in the north-east area will include "allocation of a new settlement at Northbrook Park". This is significant as Northbrook Park's location at the far north of the District puts it within the defined buffer of the TBHSPA. However, there is potential to deliver substantial and effective SANG at Northbrook Park.
 - directs new homes to locations which have capacity to accommodate them whilst "protecting the Area's physical, natural and historic environment", acknowledging that protection of the physical and natural environment is a key element in achieving positive biodiversity outcomes.

Allocations

- 9.4 Site allocations at Whitehill & Bordon are closest to an SPA as the WH2SPA is immediately adjacent to the north and the south of the town. In this context, site SA8 (Land off Hollywater and Whitehill Road) is allocated to include provision of strategic SANG to "help protect and manage ... biodiversity in this area". All of the relevant site allocations identify where SANG/other measures are required in relation to effects on the WH2SPA
- 9.5 Sites SA1, SA2, SA3, SA5, SA6, SA7, SA8 and SA12 are located within the defined buffer of the WH2SPA and it will be important to avoid direct/indirect impacts appropriately. The draft plan notes that sites SA10 and SA11 are also within the WH2SPA buffer but delivery of SANG has already been completed at these sites as part of the ongoing development process. Whilst the larger sites offer potential for some SANG within the site itself, the limited size of many of these sites will mean provision of sufficient strategic SANG will be necessary.
- 9.6 A number of site allocations are also adjacent or proximate to one or more Sites of Importance for Nature Conservation (SINCs), including areas of ancient woodland. The site policies are clear, however, that in each case "the design of development would need to minimise impacts on the area of SINC".

9.7 Additionally, sites SA1, SA 5, SA17, SA22, SA29, SA31, SA33 and SA38 are identified in the plan as requiring a Biodiversity Enhancement and Mitigation Scheme. This is notable as the sites are diverse in terms of location, scale and the type of development proposed, ranging from just 12 dwellings at site SA5 (Land at Headley Nurseries, Glayshers Hill) to around 850 dwellings, a care village and 2ha of employment land at site SA33 (land East of Horndean). It is not immediately clear what the constant between all sites is which has merited the requirement for a Biodiversity Enhancement and Mitigation Scheme. Therefore, whilst the reference to biodiversity enhancement is considered positive (given the limited reference to strategic biodiversity net gain in the plan) it is recommended that a fuller explanation of key issues/opportunities at these sites is provided.

9.8 Site SA21 (Land at Northbrook Park) is particularly notable as it is a strategic site which intersects with a number of biodiversity designations, including the 5-7km buffer zone of the WH2SPA, as well as the Fishpond Copse SINC, Ganscombe Copse SINC and Doctor's Copse SINC and extensive areas of ancient woodland. The site allocation identifies the key biodiversity issues in isolation though it is not clear that sufficient regard is given to considering the cumulative challenge of addressing these constraints in combination. There is little consideration of whether the required mitigation measures for one biodiversity designation will be compatible with required mitigation for the others. For example, there could be challenges associated with finding a final scheme design and layout which satisfactorily directs development away from one of the biodiversity designations without directing it towards others. It is recommended that these potential challenges are given consideration.

Commentary on other policies

- 9.9 Policy **\$19** (Biodiversity, Geodiversity and Nature Conservation) seeks to "conserve, protect, enhance and contribute to biodiversity, geodiversity and the natural environment". This includes a requirement that all new development will demonstrate no adverse effects on designated sites, no loss of irreplaceable habitat and achieving a net gain in biodiversity wherever possible. This is considered positive in principle, particularly in light of the focus on biodiversity net gain in the revised NPPF and the Government's 25 Year Environment Plan. However, the plan is unclear how net gain might be measured in practice and the policy could therefore be strengthened by a clearer indication of potential metrics which the council envisages using to measure net gain.
- 9.10 Policies S20 (Wealden Heaths Phase Special Protection Area), S21 (Thames Basin Heaths Special Protection Area) and S22 (Solent Special Protection Area) sets out detailed measures aimed at protecting the three SPAs with potential to be effected by development in the District. Key messages are as follows:
 - S20 there should be no net increase in dwellings or Gypsy and Traveller pitches and plots within 400m of the WH2SPA boundary and that development between 400m and 5km of the buffer must be supported by a Habitats Regulation Assessment (HRA).
 - S21 there should be no net increase in dwellings or gypsy and traveller pitches and plots within 5km
 of the TBHSPA boundary and all development between 5km and 7km of the boundary should be
 supported by a HRA.
 - S22 development proposals resulting in a net increase in dwellings or gypsy and traveller pitches and plots within the 5.6km buffer of the SPA boundary must be supported by an HRA.
- 9.11 Policy S23 (Green Infrastructure) supports development which protects and enhances green infrastructure, including through re-provision where appropriate. Green Infrastructure can provide essential wildlife corridors between habitat networks, as well as potentially providing habitats in their own right. Protecting green infrastructure from loss and harm and delivering new green infrastructure can therefore be an important contributing factor to achieving positive biodiversity outcomes. The supporting text of the policy points to the East Hampshire District Green Infrastructure Strategy Interim Report (2018) for a fuller illustration of potential opportunities for providing on site and off site green infrastructure, providing a clear steer for developers and landowners.

9.12 Policy S31 (Havant thicket reservoir) approves in principle (subject to conditions) the construction of a new winter water storage facility. This will be a construction project of significant scale. The reservoir site, on the District's southern boundary with Havant borough, is adjacent to the Havant Thicket, Thicket Bottom and Hammond's Land Copse SINCs which could have potential to experience negative effects from the construction process. The policy identifies that several mitigation measures will be necessary, notably at paragraph S31.1 (k) which requires that natural and rural character is conserved by "limiting impacts on biodiversity including the creation of new habitats; compensating for the loss of, and effects on, sites of importance for nature conservation (SINCs); enhancing adjacent SINCs; minimising the loss of ancient woodland and trees". A notable positive is identified at Paragraph S31.1 (l) which requires that "opportunities for biodiversity enhancement associated with the reservoir are realised wherever possible". This is a notable positive as it indicates that despite the potential for short term negative effects on the adjacent SINCs in the area, particularly during the construction phase, there could be significant opportunities for long term biodiversity enhancement.

- 9.13 Policy **DM25** (The Local Ecological Network) sets out protections for the local ecological network (LEN). It is notable that the supporting text of DM25 positions the (LEN) as something to which development can actively contribute, saying that "the LEN is not proposed to be an absolute constraint to development", and supplementing this with "there are a number of ways in which the impact of development can be mitigated and improvements to the LEN achieved".
- 9.14 Policy **DM26** (Trees, Hedgerows and Woodland) seeks the retention and protection of trees, hedgerows and woodland, recognising the importance of these features to, amongst other considerations, "the movement of wildlife". This reflects the supporting text of the policy which is clear that the variety of trees, hedges and woodland within the District is an important factor in supporting species diversity. Notably, DM26 also recognises that "some habitats may not benefit from additional tree planting" and that in this context development should have regard of "the requirements of the habitat type and the appropriate biodiversity enhancements". This is notable as it provides in-principle support for the restoration of heathland through tree removal associated with development, particularly at Whitehill & Bordon.

Appraisal of the plan as a whole

- 9.15 On balance the proposed spatial strategy delivers a mixed performance in biodiversity terms despite the level of constraint in the District. Northbrook Park and Whitehill & Bordon strategic expansion give rise to opportunities to deliver a strategic approach to biodiversity mitigation and enhancement, particularly in relation to provision of bespoke and strategic SANG and green infrastructure. In this context there are clear opportunities for biodiversity enhancement within the draft plan as a whole. However, a number of strategic and non-strategic sites are identified as having potential to negatively affect SINCs, Local Nature Reserves or other designated sites. It will be important that mitigation is effectively delivered in each case.
- 9.16 Additionally, the plan makes some site-specific references to achieving biodiversity enhancement or seeking opportunities for biodiversity net gain. This is positive, though it is recommended that a corresponding strategic policy is considered which requires development to explore opportunities to contribute to achieving strategic biodiversity net gain across the District where possible.
- 9.17 On balance, neither significant negative nor positive effects are predicted.

Climate change adaptation

Commentary on spatial strategy

Policy S1

9.18 A key climate change adaptation consideration for the spatial strategy is ensuring that development, particularly residential development, avoids the areas of highest flood risk. The council's Strategic Flood Risk Assessment (SFRA) identifies a range of flood risk issues and constraints across the District, with groundwater flood risk particularly associated with parts of the north of the District. The River Wey flows through the north of the District and presents fluvial flood risk issues along its course through the two northern sub-areas. Surface water flood risk represents a localised risk at some low lying sites. In this context the spatial strategy performs broadly well, though with some notable exceptions. Policy \$1, paragraph \$1.2, says that the north-east area will receive the most significant housing growth. In this context it is notable that the majority of growth at Whitehill & Bordon is located in areas of low groundwater flood risk. There are localised areas of high fluvial and surface water flood risk across the District, notably in parts of the A31 Corridor. However, it is considered that there is good potential for site-specific mitigation, such as ensuring non-residential use on the ground floor of affected new development, whilst masterplanning will help ensure it is possible to deliver scheme design and layouts which incorporate open space in the areas of highest risk. The majority of site allocations are not directly affected by medium or high fluvial or surface water flood risk.

9.19 With regard to other elements of climate change adaptation, particularly adapting to a warming climate, it is considered that strategic and detailed policies are more likely to be significant, with the spatial strategy playing a more limited direct role. However, there is potential to deliver extensive green infrastructure at the strategic sites which can have a cooling effect by reducing and fragmenting the overall area of hard surfacing within new developments.

Allocations

- 9.20 The need for appropriate mitigation is identified at all sites affected by fluvial flood risk, chiefly the need to avoid residential development at areas of sites within flood zones 2 or 3.
- 9.21 In terms of surface water flooding, whilst affected allocations are all identified, it is recommended that there should be a review for consistency. It is unclear if variation in policy wording reflects variations in the significance of risk. For example, site SA7 (Land at Middle Common, Grayshott Road) notes that "part of the site is susceptible to surface water flooding" without noting whether mitigation will be necessary. By contrast, the majority of sites with surface water flood risk issues also identify that "development will need to incorporate mitigation relating to surface water flooding".
- 9.22 There are notable site allocations in the A31 Corridor sub area affected by flood risk as a result of the River Wey's course through the area, particularly at Alton. Site **SA17** (Land at Wilsom Road) and site **SA18** (Molson Coors Brewery) are the most significantly affected sites as both are largely within Flood Zone 3 and within areas of high groundwater flood risk. However, as SA17 is purely an employment allocation and SA18 is mixed use with potential to feature employment uses at ground level, the severity of this risk is reduced to an extent. The allocations at Ropley and Four Marks are free of fluvial flood risk though site **SA25** (Land south of Winchester Road, Four Marks) has a linear area of surface water flood risk running through it which will require mitigation, potentially through design and layout.
- 9.23 At site SA21 (Land at Northbrook Park), flood risk is a more significant issue as the River Wey flows through the site's southern extent. Consequently, an area of Flood Zone 3 affects the south of the site, and this will prevent almost all forms of development from coming forward here. Elsewhere within the site fluvial flood risk is not a factor, though there are localised areas of high surface water flood risk throughout the site, and much of the centre of the site is within an area of high groundwater flood risk.
- 9.24 In the southern parishes, site SA33 (Land East of Horndean) could have potential for groundwater flooding in places. The design and layout of the final scheme may need to reflect this, particularly in terms of the proposed specialist elderly care accommodation and in light of the high level of growth proposed generally.

9.25 None of the site allocation policies identify risk of groundwater flooding despite subsequent policies (particularly policy 24: Planning for climate change; and policy S25: Managing Flood Risk) identify groundwater flood risk as affecting the District. The rationale for this is not immediately apparent within the assessments. It is **recommended** that the draft plan identifies sites at risk of groundwater flooding, along with potential mitigation measures (recognising that mitigation of groundwater flood risk can present particular technical challenges). This would align the level of site-specific detail on groundwater flood risk with that provided for fluvial and surface water risk.

Commentary on other policies

- 9.26 Policy **S23** (Green infrastructure) notes that the NPPF states that "the planning of green infrastructure in new development can help mitigate against climate change". This is in the context of the likely provision of substantial new and enhanced green infrastructure through the draft plan.
- 9.27 Policy **\$24** (Planning for climate change) is a key policy within the draft plan, and is identified in paragraph 1.37 as one of only five policies "that will be applicable to most forms of development". This positions climate change adaptation as central to the objectives of the draft plan, reflecting the importance of the issue for East Hampshire and beyond. Policy \$24 seeks all development to be resilient to climate change by adopting appropriate measures. Those of specific note in terms of climate change adaptation include:
- S24.3: "protecting existing green spaces and promoting the use of multi-functional green infrastructure";
 - S24.4: "minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures such as Sustainable Drainage Systems (SuDS)";
 - S24.7: "development involving 5 or more residential units or 500sqm or more of any additional floorspace is required to demonstrate [policy compliance] in a Sustainability Statement".
- 9.28 There are also notable messages in the supporting text of Policy S24. In particular, the fact that "the Area's extensive chalk geology makes groundwater flooding a key issue a number of sites at risk".
- 9.29 Policy **S25** (Managing Flood Risk) sets an overall strategy in relation to flood risk, establishing that the "most vulnerable development must be located in areas of lowest risk", as well as saying that development should incorporate flood protection, give priority to sustainable drainage systems (SuDS) where appropriate and not increase off site flood risk through surface water runoff.
- 9.30 Policy **\$27** (Design and Local Character) notes in paragraph \$27.1 (c) that development proposals should "incorporate good quality, climate change resilient materials".
- 9.31 Policy **S31** (Havant thicket reservoir) provides policy support for the development of an additional water storage facility to serve the District. There are many facets to the proposed reservoir, but a key one will be the additional supply that it will provide. In the context of a warming climate this could be an important adaptation measure.
- 9.32 Policy **DM26** (Trees, hedgerows and woodland) notes the important role that these features can play in climate change adaptation, particularly by "providing shade, shelter and cooling".
- 9.33 Policy **DM27** (Renewable and low carbon energy) is notable for its implications for the design and layout of new development, saying that "appropriate schemes for wind and solar energy" will be supported in principle, subject to "site specific assessment and design". The supporting text of the policy notes that "the siting and design of proposals are particularly important. Design considerations include scale, layout and simplicity to create a proposal which does not conflict with landscape character, heritage assets and their settings, focal points, and indicators of scale".

Appraisal of the plan as a whole

9.34 In the context of widespread groundwater flood risk, which makes it challenging to find areas of the District completely free of all risk types, the spatial strategy generally performs moderately well in terms of directing development towards areas of lower risk. Whitehill & Bordon is largely at low risk from all types of flooding aside from areas nearest the River Wey in the east, meaning strategic growth at the north and west of the town will be predominantly free of flood risk constraint. The southern parishes are notable for the general low flood risk of all types, though there are some notable site specific exceptions to this in terms of groundwater flood risk. The spatial strategy performs less well in these instances, as directing strategic development to areas of considerable flood risk constraint is unlikely to be positive in flood risk terms.

- 9.35 In general, the A31 Corridor area of the District is the most extensively affected by fluvial, surface and groundwater flood risk. This has implications for the draft plan's site allocations in this sub-area though the draft plan largely avoids the worst affected areas. Nevertheless, sites at Alton will need to be carefully planned to avoid areas of risk, and Site SA18 (Molson Coors Brewery) will likely need detailed and extensive mitigation.
- 9.36 In general the draft plan appropriately identifies areas of medium and high fluvial and surface water flood risk, identifying risk and potential mitigation at a site-specific scale and providing a policy framework for achieving this mitigation in practice.
- 9.37 Overall, it is considered that the plan performs reasonably well at directing the majority of strategic and non-strategic development away from areas of the highest risk. However, there are notable exceptions to this. In light of this, and in light of the otherwise good distribution of development away from areas of highest risk, significant effects are not predicted.

Climate change mitigation

Commentary on spatial strategy

Policy S1

- 9.38 The key issues in relation to climate change mitigation are the need to reduce emissions from transport (through reducing the need to travel and supporting sustainable transport options) and reducing emissions from the built environment. In this context the spatial strategy produces a mixed performance, particularly as the spatial strategy is unlikely to have a bearing on reducing emissions from the built environment. First there are a number of positives. By directing the bulk of growth to strategic sites there is an opportunity to deliver extensive green infrastructure.. This could include pedestrian and cycle links both within the new development and to nearby services where possible. Strategic growth at Whitehill & Bordon in particular includes densified residential development at, and adjacent to, the new town centre itself which will become a highly sustainable location in terms of access to services and facilities.
- 9.39 Policy S1 directs growth to a number of both strategic and non-strategic locations which are within walking and cycling distance of key town centre services, particularly at Alton, and there could be good potential to link these sites with existing and enhanced walking and cycling opportunities to access town centre services, existing and newly allocated employment sites.
- 9.40 However, a potential drawback of the spatial strategy is that by directing the most significant growth to Whitehill & Bordon, growth is concentrated at a location without a railway line, likely increasing the need to drive to access other service centres.
- 9.41 In general terms, by avoiding dispersed growth across the rural areas and smaller settlements of the District the spatial strategy broadly directs growth away from the least sustainable locations. This does not preclude some allocations coming forward in lower tier settlements, such as site SA30 in Ropley, and it is important to note that such sites have an important role to play in ensuring the viability and vitality of more rural settlements. However, in general, concentrating development at the larger settlements which offer a wider range of services is considered more likely to reduce the distance residents must travel to meet their needs.

9.42 The policy is clear that new employment and retail growth will be "directed to the main settlements within the Area and the strategic and locally significant employment sites". This will ensure that employment growth is directed towards established employment hubs where transport infrastructure, including public transport and green infrastructure, is likely to be most widely available.

Allocations

- 9.43 Site **SA9** (Whitehill & Bordon Strategic Development Area) outlines the vision for the kinds of sustainable transport options that will be delivered within the strategic development, including "a network of new cycle and walking routes [that] will connect people and the town", and "provision of a Green Grid and Green Loop to connect the green spaces across the town" to promote active travel across the town.
- 9.44 Site **SA21** (Land at Northbrook Park) is notable as there is almost no reference to provision of sustainable transport through the development process. The supporting text references the opportunity to deliver "sustainable development layouts" which could feasibly incorporate opportunities for walking and cycling within the development. However, there is no reference to opportunities or constraints associated with the site's relatively rural location, located beyond traditional walking and cycling thresholds from surrounding services and facilities. The site allocation text does not recognise potential opportunities to enhance cycle connectivity between the site and Bentley station and nor does it acknowledge or propose mitigation to the likely car dependency of the site. Regular bus services run along the A31 between Farnham and Alton and there could be potential to extend or alter existing routes to serve the Northbrook Park site directly though this is also not considered.
- 9.45 Site **SA33** (Land East of Horndean) outlines a range of facilities to be delivered on site which will reduce the need for residents to travel offsite to meet a range of day to day needs. This includes provision of "community facilities, including a primary school, community centre and convenience shop". Additionally, the site allocation notes that linkages with the existing services and facilities at Horndean will be enhanced, saying that development will "provide a safe and accessible link to existing facilities on the western side of Junction 2 of the A2(M)". This is notable as the area west of the junction includes a superstore-style supermarket which will meet a range of retail needs. Further, the site allocation notes the proximity of the site to the wide green infrastructure network, including recreational and functional footpaths, and the potential for connectivity is noted, saying development will "provide an on-site movement layout ... linked to existing external routes" and "provide new green infrastructure to connect with the wider network". This is a broad suite of measures considered likely to help support the use of sustainable transport and reduce the need to travel at a key strategic site.

Commentary on other policies

- 9.46 Policy **S4** (Health and Wellbeing) seeks positive health outcomes from new development, including the mitigation of adverse impacts where identified. This has implications for walking and cycling, and the policy says that development should "facilitate movement on foot and cycle"; create "opportunities for employment in accessible locations"; and "improve the quality and quantity of green infrastructure". Each of these measures can be expected to contribute to reducing the need to travel by car for local journeys.
- 9.47 Policy **S23** (Green Infrastructure) sets out criteria which will see development supported, including protecting and enhancing the "integrity, quality, connectivity and multi-functionality" of the green infrastructure network", mitigation of "any adverse effects on the green infrastructure network" and a requirement to provide "replacement ... of equivalent or better value in terms of quantity, quality and accessibility" should development result in loss of green infrastructure.
- 9.48 Policy **S24** (Planning for climate change) is notable in terms of climate change mitigation as it requires all development to adopt measures which "maximise the use of sustainable modes of transport".
- 9.49 Policy **S27** (Design and local character) is a broad ranging policy, with notable implications for climate change mitigation at paragraph S27.1 (b) which says development proposals should provide opportunities for "connecting new development with existing streets, and walking and cycling routes" as an integral part of the process of designing an overall scheme.
- 9.50 Policy **\$30** (Transport) positions the need to minimise reliance on private vehicles and boost sustainable transport as core elements of the draft plan. In this context there are a number of elements of the policy which are directly relevant to climate change mitigation, most notably:

Paragraph S30.1 says "development should seek to minimise the need to travel, promote opportunities for sustainable transport modes, and improve accessibility to local facilities and linkages with the surrounding pedestrian and cycle network".

Paragraph S30.2 says "development will be permitted that: (a) Integrates into existing movement networks including public rights of way where applicable; (d) Provides appropriate parking provision ... including plug in and ultra-low emission vehicles; (j) takes appropriate measure to avoid adverse impact on air quality"

Appraisal of the plan as a whole

- 9.51 The spatial strategy has a mixed performance overall, with both positive and negative elements. Directing growth to locations where there are more likely to be opportunities to integrate new development into existing settlements through green infrastructure provision, enhancing sustainable linkages for both new and existing residents, is a significant positive. However, some growth, including strategic growth, is directed to locations which are more distant from existing services and facilities and the extent to which mitigation will be possible in these instances is not always clear.
- 9.52 The range of strategic and detailed policies which seek the incorporation of, or connectivity with, green infrastructure and walking cycling opportunities is considered positive. A number of site specific policies include reference to mitigation opportunities, such as identifying potential for connecting with and enhancing existing walking and cycling routes, linking new development with existing services and facilities and reducing the need to travel by delivering services on site. However, there are notable exceptions to this and potential negative effects are not always considered at a site specific level, meaning opportunities to identify mitigation can be missed.
- 9.53 On balance, it is considered that the plan as a whole is multifaceted in terms of climate change mitigation and whilst there are considerable positives, there remain a number of drawbacks as well. Therefore, in conclusion the plan's performance is mixed and neither significant positive or negative effects are predicted.

Community and wellbeing

Commentary on spatial strategy

Policy S1

- 9.54 The key issues in relation to community and wellbeing are the extent to which new development will help meet the needs of an ageing population, support improvements to the health and wellbeing of the population and improve accessibility to facilities and services. There is therefore a need to consider the extent to which new development delivers new and enhanced facilities and services, as well as the extent to which access to existing services is improved. In this context the spatial strategy ensures that development will deliver two substantial areas of SANG at Whitehill & Bordon, both of which would enhance the opportunities for leisure and recreation for residents of the town itself, as well as surrounding smaller settlements and villages. It is likely that the new green infrastructure assets delivered through the strategic development at Whitehill & Bordon would also have health-related benefits, as it could position walking and cycling as viable and attractive options for travel to and from the new town centre. This is well aligned with the 'Healthy New Town' initiative in the town, which envisages the town's redevelopment leading to "a green and healthy vision for the town which that makes it easy for people to live healthy and active and independent lives, where it is easier to walk and cycle than travel by car and the town centre is a healthy food environment"19. Growth at Whitehill & Bordon will also enable habitat restoration projects of heathland in the area, which have been identified as being of potential community value through fostering a shared sense of ownership and promoting social cohesion.
- 9.55 Additionally, by directing a proportion of growth to be delivered in the A31 Corridor the policy offers opportunities to deliver new and enhanced community infrastructure. Growth at Alton in particular could offer opportunities for enhancement within the town, and there is potential to deliver new green infrastructure links between the new settlement at Northbrook Park and the Alice Holt forest in the South Downs National Park, in addition to the potential to improve transport links to the town of Farnham in

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¹⁹ NHS England, "Healthy New Towns – Whitehill and Bordon" [online], available from: https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/whitehill-bordon/

Surrey, which has many community facilities and services. This option could also facilitate the delivery of green infrastructure enhancements to the northern Wey Valley, which has been outlined as a potential GI project for the local plan, in the draft East Hampshire Green Infrastructure Strategy.

Allocations

- 9.56 Site SA33 (Land East of Horndean) is the focus of development in the south of the District which is likely to give rise to opportunities to deliver strategic new green infrastructure, recreation facilities and community infrastructure through the development process. Additionally, the site is likely to contribute to meeting the needs of an ageing population through the provision of a 60-bed care home on site. The allocation of specialist aged care within the site could give rise to potential opportunities for mixed generational living subject to the final design and masterplan for the overall scheme. Additionally, Site SA33 is expected to deliver a new primary school, along with sufficient land to accommodate future expansion as necessary.
- 9.57 Site **SA4** (Land adjacent to Billerica, Church Road) is allocated for community use to serve the residents of Bramshott. No details on potential use is provided though in principle the allocation is likely to increase the accessibility of community facilities for Bramshott residents, whilst potentially also helping improve health and wellbeing, depending on the eventual scheme which is delivered.
- 9.58 Site **SA8** (Land off Hollywater and Whitehill Road) is notable for the allocation of a substantial area of strategic SANG, including the Eveley Wood designated ancient woodland. On the understanding that the primary purpose of SANG is to divert recreational pressure away from the region's SPAs it is likely that the allocations of such a significant area immediately adjacent to the built area of the Whitehill & Bordon will enable many residents to enjoy access to high quality green space.
- 9.59 Site **SA11** (Bordon Garrison) is notable for the provision of both a new primary school and a new secondary school. Both facilities are likely to be of a considerable size, with the primary school expected to be at three forms of entry (3FE) and the secondary school up to 8FE.
- 9.60 Site **SA20** (Treloar College) will enhance the educational facilities at Treloar College including the delivery of staff accommodation at the site. The college provides a unique service within the context of the plan area and the allocation will improve accessibility and delivery of these services.
- 9.61 Site **SA29** (Land North of Boyneswood Lane) is notable as it identifies that delivery of the consented 51 dwellings at the site in Medstead could lead to capacity issues at Four Marks Primary School. The site is an existing allocation with planning consent, though it is not clear if the potential need to enhance Four Marks Primary School is a need which has been identified since consent was granted or if mitigation of the capacity issues is a condition of the permission.
- 9.62 Policy **DM23** (Whitehill & Bordon new town centre) says that the new town centre "will be delivered to create a sustainable community". This is expected to include new community services and facilities, enabling greater access to services for the existing community in the town through an enhanced service offer, and providing high quality new services for incoming residents.

Commentary on other policies

- 9.63 Policy **S4** (Health and Wellbeing) sets out the strategic framework for provision of community infrastructure and sits above a number of daughter DM policies which provide additional focus and detail. The policy establishes a raft of potential measures that development proposals should incorporate to promote health and wellbeing. The supporting text of Policy **S4** notes that planning "can have a significant role in improving health and wellbeing and enabling healthier lifestyles". Policy S4, paragraph S4.2d emphasises the importance of inclusive design, saying that development proposals should "reflect changes that occur over a lifetime, so people are not excluded by design as their circumstances change".
- 9.64 Policy **S8** (Specialist Housing) expands on this point, providing in-principle support for "specialist needs such as homes for older people".
- 9.65 Policy **S27** (Design and local character) includes within its supporting text recognition of the importance of considering how design can help "facilitate healthy lifestyles". This is notable as it expands the role of design from a purely aesthetic or visual one to a key means of delivering functional planning gain.

9.66 Policy **S31** (Havant Thicket Reservoir) is a significant policy in the context of health and wellbeing. Although it is not the Local Plan itself which is driving the delivery of the reservoir, Policy S31 makes it clear that, subject to satisfaction of a range of criteria, "planning permission will be granted" for the reservoir's construction, anticipated to take place over a period of ten years. The reservoir will provide a significant new leisure asset, with the supporting text of the policy envisaging "major leisure and recreation potential which complements Staunton Country Park with significant benefits for health and wellbeing". In addition to water-based activities, the policy says at paragraph S31.1 (i) that the scheme should ensure "recreation provision includes a network of paths for walking, cycling and horse riding", saying additionally that "footpaths and cycle paths should connect to the existing public and permissive paths in the neighbouring area".

- 9.67 The importance of community infrastructure is recognised by policies **DM1** (Provision and enhancement of open space, sport and recreation), **DM2** (Protection of open space, sport and recreation), **DM3** (Provision of social infrastructure), **DM4** (Protection of social infrastructure). Collectively these policies set out expectations for the circumstances under which new community infrastructure should be delivered as well as establishing protection for existing community infrastructure.
- 9.68 Policy **DM6** (Accessible and adaptable homes) sets out measures intended to help adapt to the changing needs of an aging population (Accessible and adaptable homes), including requiring compliance with the relevant building regulations. The supporting text of Policy DM6 notes that this is in response to "the ageing population and the significant increase in persons in advanced old age".

Appraisal of the plan as a whole

- 9.69 The spatial strategy performs well, distributing strategic growth, and the associated opportunities for delivering significant new community infrastructure, to each sub-area of the District. Directing growth to Whitehill & Bordon will enable the delivery of new green infrastructure, and strategic development will contribute strongly to the eco-town initiative. This will likely make a significant contribution to the health and wellbeing of residents through encouraging and enabling walking and cycling to become attractive transport options. Strategic growth proposed elsewhere will likely lead to delivering of a range of community assets, as well as enhanced green infrastructure and opportunities for outdoor recreation and leisure.
- 9.70 A number of the non-strategic site options also include provision of community infrastructure and facilities which will contribute to enhancing accessibility at a localised scale. There is recognition throughout the plan that meeting the needs of an ageing population will be of great importance and a range of strategic and detailed policies present measures for achieving this through the design, location and layout of development. Havant Thicket Reservoir offers a unique opportunity to deliver an exceptional recreation and leisure resource, and this could benefit the health and wellbeing of both local residents and those from further afield.
- 9.71 Overall, the draft plan is predicted to achieve significant positive effects in respect of community and wellbeing.

Economy and employment

Commentary on spatial strategy

Policy S1

9.72 The spatial strategy performs strongly, delivering a broad distribution of employment site allocations that are likely to meet a range of employment needs whilst also improving accessibility to local jobs and training opportunities. The spatial strategy provides substantial additional employment land in the strategically advantageous A31 corridor, close to the regional centres of Alton and Farnham, whilst also delivering new employment as part of the transformational regeneration of Whitehill & Bordon new town centre and at Land East of Horndean in the south of District. Although the Council's Housing & Economic Development Needs Assessment suggests that the quantitative needs for new employment facilities are relatively small, it also identifies qualitative issues that count in favour of greater provision and the spatial strategy is well aligned with this outcome. The range of sites that would be provided through the spatial strategy is therefore as significant as the overall quantum, particularly in terms of meeting the needs of small and medium-sized businesses.

Allocations

9.73 The plan achieves a good distribution of employment floorspace across the plan area, though with a particular focus on the A31 corridor. The most notable new sites are outlined below:

- 9.74 Site SA9 (Whitehill & Bordon Strategic Development Area) is notable for the range of employment land and other features with potential for a direct effect on the economy and employment in Whitehill & Bordon. This includes a total of 2.36ha of additional floorspace which already has planning consent at Site SA10 (Louisburg Barracks) and 23,000sqm of retail, business and leisure in the new town centre at Site SA11 (Bordon Garrison). In total, around 5ha of employment land will be delivered at the Whitehill & Bordon Enterprise Zone, which forms a key element of the broader regeneration activity in the town.
- 9.75 Site **SA17** (Land at Wilsom Road) is notable as despite its location adjacent to the A31 there is no direct access, meaning traffic generated by the site will have to use the existing Wilsom Road / Mill Lane route to access the A31. The site will provide an additional 3ha of B-class employment use at Alton.
- 9.76 Site **SA18** (Molson Coors Brewery) will deliver employment as part of the larger mixed use development, potentially including small B-class employment along with retail and a hotel. The site is notable as it is largely within Flood Zone 3 and this will likely determine the layout and design of the site in terms of the relationship between employment and residential.
- 9.77 Site **SA21** (Land at Northbrook Park) will include about 6ha of employment uses, offering the opportunity to deliver high quality employment space at a new strategic location. The site as a whole will also see major residential development, potentially helping to supply workers locally.
- 9.78 Site SA22 (Land at Lynch Hill) provides a substantial additional supply of high quality employment land, effectively extending the existing successful Waterbrook business park with 14.3ha of B-class employment. The location offers good access to the A31 and would function as a natural extension of the existing established use.
- 9.79 Site **SA24** (Land adjoining Northfield Lane) will provide an additional 5.3ha of employment land at the southern extent of Alton offering good access to the A31. Whilst there are potential flood risk constraints in part of the site and a need for sensitive design in light of the nearby South Downs National Park, it is considered that SA24 offers potential for delivery of an accessible, high quality employment environment.
- 9.80 Site **SA33** (Land East of Horndean) is a large mixed use site, and in the context of potential capacity for up to 850 dwellings it is appropriate that some employment land is also delivered on site. This will be in the form of around 2ha of B1 and B2 uses and will represent the draft plan's most significant employment provision in the south of the District.

Commentary on other policies

- 9.81 Policy **\$13** (Planning for economic development) notes in the supporting text that local employers report "skills shortages and difficulty in recruiting locally". The supporting text is notable for the proposed response to this issue, saying that developments exceeding 1,000sqm (net) as well as developments proposing a net gain of 50 or more dwellings "will be required to enter a skills and training agreement". Additionally, it is considered that housing growth near the key Strategic and Locally Significant Employment Sites can be part of the short term solution to recruitment shortfalls by providing a larger local skills pool to draw upon whilst the effects of enhanced training efforts are awaited.
- 9.82 Policy **\$14** (Maintaining and improving employment floorspace) seeks protection for Strategic and Locally Significant Employment Sites, saying "employment floorspace will be protected and the loss strongly resisted". East Hampshire District Council has made an Article 4 Direction²⁰, effective 31st March 2019, which will remove permitted development rights for the change of use of land or buildings from B-class uses to residential use²¹, and in this context Policy S14 affords considerable control of the protection of employment uses which might otherwise be vulnerable to conversion to residential use.

²⁰ under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015.

²¹ East Hampshire District Council (2018), "Article 4 Direction for Conversion from Employment to Residential Use" [online], available from: https://www.easthants.gov.uk/article-4-direction-conversion-employment-residential-use

9.83 Policy **S15** (Rural economy) outlines measures aimed at helping rural businesses such as farming and forestry to "remain competitive and viable" as these industries "continue to evolve". This includes supporting "sustainable growth and expansion of all types of business and enterprise in rural areas"; supporting the "development and diversification" of rural business; and supporting the implementation of the Hampshire Superfast Broadband Programme across rural areas.

- 9.84 Policy **\$16** (Retail hierarchy and network) includes the forthcoming new Whitehill & Bordon town centre on the retail hierarchy, providing a high level indication of the level of services and facilities that will eventually be on offer and confirming that the town will have a much greater retail and service offering through the new town centre than presently offered through the Forest Centre.
- 9.85 Policy **DM23** (Whitehill & Bordon new town centre) reaffirms via supporting text that the Bordon Garrison Strategic Allocation (Site SA11) has outline planning consent and a reserved matters application for phase 1 of the redevelopment of the town centre. The policy says that the new town centre will deliver "an increased range of shops and leisure facilities" to address the existing "poor supply of comparison shops (e.g. clothing, household goods) for a town of its size". In addition to boosting spending on comparison goods within the town and associated job creation, the increased retail offer will likely attract some consumers from outside the town, further boosting the town's economy.
- 9.86 Policy **DM41** (Telecommunications and digital infrastructure) recognises in the supporting text that "good telecommunications, and the infrastructure that it requires, is an essential part of modern day living and supports economic growth" as well as recognising the importance of access to broadband for businesses. This is demonstrated most clearly in paragraph DM41.3 which requires new development to deliver "appropriate telecommunications provision, including for high-speed broadband". This is notable as digital infrastructure will be of increasing economic importance over the plan period, particularly as increasing levels of work is conducted from home or in other flexible, remote locations. There could also be particular positives for the rural economy, as noted in the supporting text of DM41 which notes the importance of digital infrastructure to "the viability and long-term sustainability of rural communities".

Appraisal of the plan as a whole

- 9.87 The Spatial Strategy performs well in terms of contributing to providing a range of good quality employment sites and improving accessibility to local employment and training. Directing substantial growth to Whitehill & Bordon will help deliver and sustain the new town centre, as set out in detail in site SA11 (Bordon Garrison) and Policy DM23 (Whitehill & Bordon new town centre). The spatial strategy ensures these policies deliver new employment in combination with new housing at a key future economic hub of the District.
- 9.88 Further, the distribution of new employment land between the key higher tier settlements, with a focus at the main town of Alton but with a good overall distribution is considered likely to help the District consolidate and enhance its economic diversity and vitality. Extending existing Strategic Employment Sites at Alton and at Whitehill & Bordon, provided this is supported by appropriate infrastructure as necessary, is considered positive. It is considered that housing growth near the key Strategic and Locally Significant Employment Sites can be part of the short term solution to recruitment shortfalls by providing a larger local skills pool to draw upon. The draft plan delivers above need in terms of employment floorspace which will help enable businesses to choose from a variety of accommodation to enable different types and sizes of businesses to best meet their needs and a good range of accommodation should help ensure that businesses are not prevented from expanding locally. It is particularly notable that some employment sites at Alton are within flood risk zones. However, by virtue of their proposed use the risk is acceptable as long as mitigation is delivered as necessary and as required by policy.
- 9.89 The draft plan includes a range of policy tools aimed at protecting existing employment sites, particularly those which might be vulnerable to loss through conversion. There is also good awareness of the needs of rural business, and an acknowledgement of the potential for these needs to develop over the plan period as the nature of rural business evolves over time.
- 9.90 Overall it is considered that the plan is likely to have **significant positive effects** in relation to economy and employment.

Heritage

Commentary on spatial strategy

Policy S1

9.91 The focus of much strategic growth at Whitehill & Bordon is considered unlikely to directly affect designated heritage assets, partly as a result of there being few such assets in the town and partly because development is focussed on greenfield or recently cleared sites. However, the town's long association with the military has a degree of influence over its broader identity and character and there could be opportunities to reflect the town's military heritage within new development. Additionally, the allocation of strategic SANG to the east of the town could help to facilitate access to and appreciation of the unusual and extensive River Wey Conservation Area which would be immediately adjacent to the east.

- 9.92 By contrast, strategic development of up to 800 dwellings at Northbrook Park would likely affect the cluster of prominent listed buildings associated with the wedding venue and hotel in the former stately home and country estate on the site. The current undeveloped setting of the listed buildings contributes to their intrinsic historic character and it can be expected that urbanisation of the area would likely affect this historic setting. However, because the boundaries of the new settlement have not been finalised, there remains significant potential to secure a sympathetic layout for new housing and community facilities at Northbrook Park.
- 9.93 In terms of the distribution of non-strategic sites, the spatial strategy performs well. Very few sites are within or are directly adjacent to conservation areas or registered parks and gardens, though with notable exceptions at site SA18 (Molson Coors Brewery), site SA20 (Treloar College) and SA35 (Parsonage Farm, Catherington Lane) which are adjacent to the Alton Conservation Area, Holybourne Conservation Area and Catherington Conservation Area respectively.

Allocations

- 9.94 It is considered that site allocations which have potential to affect a heritage asset or its setting all identify the need to mitigate potential harm. There do not appear to be any site allocations which fail to identify that they affect a historic asset or its setting where applicable.
- 9.95 Site **SA18** (Molson Coors Brewery); site **SA20** (Treloar College) and site **SA35** (Parsonage Farm, Catherington Lane) are adjacent to conservation areas and it will be important that new development at the sites appropriately reflects this context, particularly SA18 which is a relatively large site in a prominent location within Alton.
- 9.96 It is noted that site **SA24**, which proposes 5.3ha of employment land, is immediately west of the Chawton Conservation Area, which is the location of the notable heritage attraction of Jane Austen's house museum. However, the A31 runs between the site and the conservation area and is considered to sever the historical setting of the conservation area.
- 9.97 Site SA21 (Land at Northbrook Park) identifies that heritage constraints on site include listed buildings, though there is little discussion of the broader historic rural character of the site's setting. The need to mitigate harm to the intrinsic historic character of assets on site is noted individually, though the potential cumulative challenge of achieving this in combination with all other constraints is not acknowledged.
- 9.98 Site **SA16** (Will Hall Farm) and site **SA19** (Land at Brick Kiln Lane & Basingstoke Road) are notable for their proximity to the Grade II listed group of distinctive oasthouses immediately west of Will Hall farmhouse.

Commentary on other policies

- 9.99 Policy **S28** (Heritage assets and the historic environment) sets out the strategic criteria to be met by development proposals to:
 - a) "protect, conserve and, where possible, enhance the significance of designated and non-designated heritage assets and the contribution they make to local distinctiveness and sense of place; and
 - b) make sensitive use of historic assets, especially those at risk, through regeneration and reuse, particularly where redundant or under-used buildings are brought into appropriate use."

9.100 The policy also sets out measures development will be required to take to demonstrate how potential harm to heritage assets will be mitigated. This notably includes a requirement that development "that would affect, or has potential to affect, a heritage asset will be required to submit a Heritage Statement".

- 9.101 Subsequent daughter DM policies set out a broad range of protections for historic designations, heritage assets and their settings, listed buildings and their settings as well as consideration of the effect of harmful development at a particular feature upon the historic character and setting of its wider area.
- 9.102 Policy **\$31** (Havant thicket reservoir) will enable delivery of the new Havant Thicket Reservoir in a location adjacent to the Sir George Staunton Conservation Area and the Grade II*-listed Leigh Park Registered Park and Garden. This could give rise to potential effects upon both heritage assets, particularly during the construction phase, though the policy notes at Paragraph S31.1 (k) that the development of the reservoir should conserve natural and rural character, in part through "integrating the reservoir and the new landscape with the historic landscape of the Sir George Staunton Conservation Area".

Appraisal of the plan as a whole

- 9.103 The draft plan performs broadly well overall, setting out strong and proportionate protection for the range of historic assets within the District, making reference to the significance both of designated and undesignated assets and recognising their contribution to the character of the area. The spatial strategy performs well in general, with the bulk of development directed towards Whitehill & Bordon which are largely unconstrained by heritage considerations. However, delivering a strategic new settlement at Northbrook Park is likely to have significant implications for the setting and character of the listed buildings on the site, though it is acknowledged that design and layout of any future scheme will contribute to mitigating these risks.
- 9.104 Whilst SA21 (Land at Northbrook Park) does acknowledge the heritage constraints on site, it does little to identify the particular prominence of the listed buildings within the site or identify that mitigation of the heritage constraint must take place within the context of mitigation of biodiversity and flood risk constraints. Additionally, there is little to no reference to potential opportunities for enhancing access to and understanding of the District's historic and cultural heritage. The draft plan, particularly Policy S28, would be strengthened by additional reference to such opportunities, and it is recommended that that development should be expected to seek to secure enhancements where possible. Alternatively, there may be scope for an additional DM policy to be included or the scope of an existing DM policy expanded, though it is considered more appropriate to address the issue of access and understanding through a strategic policy.
- 9.105 Additionally, it is notable that **Policy S28** effectively repeats paragraph 195 of the NPPF verbatim. It is unnecessary to repeat national policy in Local Plan policies, and could risk a situation in which future updates to the NPPF potentially result in a conflict between local and national policy. It is considered that this has some potential to affect performance against the SA Heritage objective as potential policy conflict in future may weaken the capacity of the council to ensure protection and enhancement of historic and cultural heritage.
- 9.106 In conclusion, although the draft plan performs well in some aspects, **significant effects are not predicted**.

Housing

Commentary on spatial strategy

Policy S1

9.107 The spatial strategy performs very well in terms of housing. Policy **S1** is clear that the draft plan delivers more than the minimum housing requirement established through the Government's standard method for assessing housing needs (i.e. taking account of housing completions since 2017; existing planning permissions for housing; and the estimated delivery of new housing on unforeseen or "windfall" sites until 2036). The quantum of housing which will be delivered through the plan presents an opportunity to deliver a wide variety of types and tenures of housing, including the potential for substantial numbers of affordable homes. Additionally, the opportunities for residential development are widely dispersed across the planning area, with strategic housing growth coming forward in two of the three planning sub-areas of the District, and further, albeit lower, growth delivered in the third. In particular, the distribution of major sites (i.e. sites of 11 units or greater) throughout the plan area is good, and this could give rise to well dispersed opportunities to seek affordable housing delivery or commuted payments in lieu thereof. This could help ensure that the District's affordable and specialist housing need is met in part across a broad range of sites and settlements, not simply at the strategic sites at Northbrook Park and Whitehill & Bordon.

9.108 The SA Scoping Report shows that one of the key issues facing the District over the plan period will be planning for the needs of an ageing population. In this context, it is noteworthy that broad distribution of growth throughout the District has potential to facilitate development of substantial numbers of new supported housing and/or specialist care accommodation, in a manner that would be integrated with other forms of new housing, facilities and services, including at new development near the new Whitehill & Bordon town centre.

Allocations

- 9.109 It is notable that in addition to the strategic sites at Northbrook Park, Whitehill & Bordon and Land East of Horndean the draft plan delivers a number of large developments at the other key settlements. The site allocation policies clearly present their respective contributions to meeting the District's housing need; all either detail a specific quantum or a range of anticipated delivery. All site allocations set out likely specific constraints at each site, though tend to discuss opportunities in broader terms.
- 9.110 Sites in the North-East area of the District will deliver a minimum of 5,381 dwellings over the plan period, though of this total only around 1,594 are allocated by the draft plan itself (with the remainder comprising completions since the plan base date and outstanding permissions). The most notable of these sites are outlined below, and it is of particular note that all are of sufficient scale to have potential to deliver a wide range of types and tenures of housing, potentially including affordable, self-build and other specialist accommodation.
- 9.111 Site **SA1** (Land at Lowsley Farm, South of the A3) is allocated for around 175 dwellings and site **SA2** (Chiltley Farm, Chiltley Lane) are notable as they will collectively deliver substantial growth at Liphook, which is heavily constrained by environmental and landscape designations. This is a significant positive in terms of ensuring housing growth is well distributed.
- 9.112 Site SA8 (Land off Hollywater and Whitehill Road) is allocated for between 100 and 360 dwellings at Whitehill & Bordon. The site is notable as it ensures strategic growth is well distributed within the town rather than simply concentrating growth at the northern sites. The site will also deliver a large area of strategic SANG.
- 9.113 Site **SA10** (Louisburg Barracks) and site **SA11** (Bordon Garrison) will deliver transformational growth to the north and at the centre of Whitehill & Bordon, of which around 1,284 dwellings are allocated in the draft plan.

9.114 Sites in the North / A31 Corridor area of the District will deliver a minimum of 3,075 dwellings over the plan period with around 1,296 of this total allocated by the draft plan. The most notable of these are: site SA13 (Land at Borovere Farm) delivering 249 dwellings; site SA14 (Land at Cadnam, Upper Anstey Way) delivering 275 dwellings; site SA15 (Land at Lord Mayor Treloar) delivering 280 dwellings; site SA16 (Land at Will Hall Farm) delivering 180 dwellings; site SA18 (Molson Coors Brewery) delivering between 140-200 dwellings and site SA19 (Land at Brick Kiln Lane and Basingstoke Road) delivering between 171-255 dwellings. Collectively, this represents notable growth at Alton which reflects the town's status as largest settlement, most significant employment centre and well connected transport hub.

- 9.115 Site **SA21** (Land at Northbrook Park) will deliver a minimum of 800 dwellings at a new strategic settlement between the existing regional centres of Alton and Farnham. The site is notable for being the only truly new settlement in the draft plan, and it is of particular note that whilst there is considerable opportunity to deliver a masterplanned new community supported by new infrastructure and services there are also a number of environmental and heritage constraints which will require extensive mitigation.
- 9.116 Site **SA25** (Land South of Winchester Road, Four Marks) will deliver between 130 and 150 dwellings at Four Marks. This site is notable as the only significant allocation in the town, reflecting the high level of growth delivered at Four Marks in recent years through the current Local Plan.
- 9.117 Sites in the Southern area of the District will deliver a minimum of 1,903 dwellings over the plan period with around 733 of this total allocated by the draft plan. The most notable of these are:
- 9.118 Site **SA32** (Clanfield Country Farms, South Lane) will deliver around 100 dwellings at Clanfield, and is notable for being the only allocation to come forward at the settlement. This reflects the potential for landscape sensitivity at the settlement as well as the fact the current Local Plan has delivered significant recent growth.
- 9.119 Site **SA33** (Land East of Horndean) will deliver around 850 dwellings in a strategic new community which will both meet many needs within the site and connect well with surrounding services. The site is notable as it ensures that strategic growth is delivered in all three plan sub-areas.
- 9.120 Site SA37 (Land North of Woodcroft Farm) which will deliver between 170 and 180 dwelling at Lovedean. This site is notable as there is currently a degree of perceptual distance between the main built area of Lovedean and the site itself. It will be important that the character of the area is not harmed by the development of this site.
- 9.121 Site SA41 (Land South of Little Leigh Farm) which will deliver between 100 and 115 dwellings on the Havant fringe in the far south of the District. This site is notable as it will function as an extension of the Havant built area and will likely face towards Havant for access to services and facilities rather than to towards the rest of East Hampshire.

Commentary on other policies

9.122 Policy \$5 (Housing mix and type) seeks to ensure the housing needs of the local area are met through the provision of a range of house types, tenures and sizes. The policy says that major development (i.e. 10 homes or above) should address the need for smaller homes, specialist accommodation and the need for self and custom build plots. It is notable that Policy \$5 seeks developer contributions "to fund a community project worker on all sites of 20 dwellings or more". However, it is not clear what is meant by the term "community project worker" in paragraph \$5.5. It is recommended that stronger guidance is provided on interpreting this term to give a clearer indication of the potential costs associated with the requirement, with flow-on impacts on scheme viability.

9.123 Policy **S6** (Affordable housing) seeks 40% affordable housing from developments of 11 or more dwellings, or which have a combined gross floor area of more than 1,000sqm. The supporting text of the policy notes that the 40% target is "based on local need and viability". The supporting text also notes that "if there is any doubt about the viability of the affordable housing provision required the Local Planning Authority on a particular scheme, it will be the responsibility of the developer to make a case, to the satisfaction of the Local Planning Authority, that the Local Planning Authority's affordable housing requirement will render the scheme unviable". In "exceptional" cases where onsite provision of affordable housing is demonstrated to be unviable the supporting text of the policy says that the council "may accept a commuted sum in lieu of actual provision". The sites to which this policy will apply are well dispersed across the plan area and this should help deliver affordable housing at a range of locations, not simply the strategic sites. Additionally, there is a good variety of sites which are of sufficient scale to have potential for significant affordable housing delivery, assuming policy compliance. However, it is acknowledged that financial viability can limit what is achievable in practice. Also, it is not clear whether the 11 dwelling threshold is a gross or net figure. This could have considerable implications for how much affordable housing is achievable as potentially far more affordable homes could be achieved if the threshold is in net terms. It is recommended that this is clarified.

- 9.124 Policy S7 (Rural affordable housing) provides for affordable housing to meet local needs on rural exception sites (i.e. unallocated land outside settlement policy boundaries or rural confines), subject to a range of criteria. The supporting text of the policy notes that rural exception schemes address "specific problems of housing affordability in rural areas" and rural exception policies which "provide 100% affordable housing" are well established. It is notable, therefore, that paragraph S7.3 of Policy S7 says that "low cost market housing will be acceptable as an element of a rural exception scheme to enable the financial viability of the scheme or to meet an identified local need", going on to note that market housing will comprise no more than 30% of a rural exception scheme, subject to submission of a financial viability statement.
- 9.125 Policy S8 (Specialist housing) says that proposals for meeting specialist needs such as "homes for older people, people with disabilities, or homes for other specific groups" will be supported, subject to satisfying a range of criteria. Notably, the supporting text says that specialist housing does not including C3 (i.e. residential) uses. The supporting text goes on to note that "the area faces a demographic challenge in the coming decades, with a substantial rise forecast in its older population" and clarifies that the policy requires "that sites are appropriately located in terms of access to facilities, services and public transport".
- 9.126 Policy **\$9** (Gypsies, travellers and travelling showpeople accommodation) sets out a relatively wide range of criteria which will ideally be satisfied before support is provided (such as convenient access to services and safe site access), though the policy recognises that "there are unlikely to be sites which would meet every one of these criteria" and a best fit approach will be taken by decision makers. In this context the supporting text emphasises the importance of "creating inclusive, mixed and sustainable communities" by encouraging "social interaction with neighbours and the local community".
- 9.127 Policy **\$12** (New homes in the countryside) recognises that although there is a presumption against most forms of development in the countryside, there can be instances where a countryside location is necessary for certain types of development. This is with a view to supporting the vitality of the countryside and the people who live and work there, including through the provision of rural workers dwellings where a need is demonstrated.

Appraisal of the plan as a whole

9.128 The spatial strategy performs well, distributing housing growth widely around the District. The strategy will help ensure a wide variety of homes will be delivered at Whitehill & Bordon, contributing to delivery of transformational growth at the town and offering potential to meet the a wide range of needs through development. Delivery of strategic growth at Northbrook Park will provide an opportunity to deliver a mix of housing types and tenures pepper potted throughout the site. Broadly, housing growth is well distributed, largely avoiding over concentrations at settlements which have had seen most significant recent growth (particularly Four Marks and Clanfield) whilst still dispersing allocations between the majority of higher tier settlements. However, there is a notable focus on growth in the north east of the District with more modest growth in the southern parishes. Strategic scale growth at Land East of Horndean ensures that the southern parishes also benefit from provision of development which has potential to deliver a wide variety of types and tenures, potentially including an aged care facility and other specialist provision.

9.129 Beyond the opportunities presented at the strategic sites, Policy S5 (Housing mix and type) will theoretically contribute to achieving housing mix at all major development. The dispersal of sites to which this policy would apply is broad, and so the delivery of mixed types and tenures has potential to be well distributed across the plan area. This is complemented by Policy DM8 (Self and custom housebuilding) which has potential to help introduce a new and under exploited source of housing delivery via self and custom build, particularly at the strategic sites.

9.130 In light of the above the plan overall performs strongly and is predicted to lead to significant positive effects.

Landscape and townscape

Commentary on spatial strategy

Policy S1

9.131 The draft plan area is largely rural and scenic, with the South Downs National Park (SDNP) providing significant landscape context for the plan area itself. In this light the key consideration in terms of landscape is the need to avoid negative effects on the SDNP and its setting. In spatial strategy terms, this means directing development away from areas of the greatest landscape sensitivity as substantially as possible, whilst also ensuring that doing so does not negatively affect the townscape of the District's settlements. Policy S1 acknowledges this, saying that growth will be directed to locations which protect "the Area's physical, natural and historic environment". However, effects on landscape and townscape character are likely to vary across the plan area based on local context. By focussing growth at Whitehill & Bordon, Policy S1 will likely help enhance the townscape character, and potentially the landscape character, of former industrial sites and MoD facilities, many of which are currently of poor quality. However, growth in the A31 Corridor has a more diverse context, with growth in and around existing urban areas likely to provide opportunities for townscape enhancement whilst a new settlement option is likely to have implications in landscape terms.

Allocations

- 9.132 Numerous site specific policies reference landscape as a key consideration. In particular, site allocations which are within the setting of the South Downs National Park, or are otherwise sensitive within the landscape, generally identify the associated constraints and necessary mitigations as necessary.
- 9.133 Similarly, site allocations which are within or adjacent to a conservation area, or are within the setting of a listed building or other heritage asset also generally identify the associated constraints and necessary mitigations as necessary.
- 9.134 Site **SA9** (Whitehill & Bordon Strategic Development Area) includes a new town centre which has potential to substantially enhance townscape character with very low impact on landscape character. Perhaps the greatest effect on townscape could be the opportunity to deliver a coherent and progressive visual identity for the town, improving utilisation of available land on central sites which currently offer little townscape value and adding new sites at the urban fringe to deliver a more rational, connected and nucleated settlement. However, the more peripheral Whitehill & Bordon sites, particularly those on greenfield land, have potential to be more exposed to views in and out of the settlement and could be more sensitive in landscape terms. Nevertheless, the Landscape Capacity Study does not single out these areas for specific concern, saying that development should be "informed by further landscape work", likely to come forward through the application process. The designation of a large area of SANG at the western edge of Whitehill & Bordon will preserve the undeveloped state of this area and soften the landscape impact of the edge-of-town development, as well as offering the potential for restoring more of the landscape in this area to heathland.

9.135 Site **SA21** (Land at Northbrook Park) is notable in that it is constrained in both landscape and townscape terms. The Landscape Capacity Study proposes that the "overall management objective should be to conserve the tranquil, natural character of the Northern Wey Valley", a challenging objective in the context of developing a new settlement. Indeed, the study goes on to state that "new development or large scale change...would be highly visible". Whilst the retention and expansion of green infrastructure, in accordance with the character of the area, could mitigate visual impacts it is highly likely that the allocated of up to 800 dwellings will result in a loss of rural tranquillity at Northbrook Park and its immediate environs. The need to avoid adversely affecting the setting of the listed buildings on site and the "need to reflect landscape matters" is noted individually, though the potential cumulative challenge of achieving this in combination with all other constraints is not acknowledged.

- 9.136 It is notable that Sites SA14 (Land at Cadnam Farm), SA16 (Land at Will Hall Farm), SA19 (Land at Brick Kiln Lane & Basingstoke Road), SA34 (Land to the rear of 191-211 Lovedean Lane), SA36 (Land at Cottage Farm, James Copse Close) are the only sites where the need to "respond positively to, and respect, the topography of the site" is specifically identified. These sites are particularly elevated or prominent within their landscape setting. Effects on landscape could be finely balanced, largely dependent on site specific mitigation through design, massing and layout.
- 9.137 Site **SA32** (Clanfield Country Farms, South Lane) is notable in that the need for the design of new development to "sensitively relate to the nearby South Downs National Park" is flagged, suggesting landscape sensitivity. However, within the 'summary reason for allocation' section, the text notes that, subject to suitably designed green infrastructure, "new housing could be acceptably accommodated in the wider landscape". However, within the 'summary reason for allocation' section, the text notes that, subject to suitably designed green infrastructure, "new housing could be acceptable accommodated in the wider landscape". Whilst it is acknowledged there is not actually a conflict between these two statements, there could be scope for greater clarity in tone, as the text initially appears to suggest low landscape sensitivity but goes on to suggest that the setting of the SDNP could be a constraint.

Commentary on other policies

- 9.138 Policy **\$18** (Landscape) is the core Landscape policy, establishing how and why the District's landscapes will be protected. The policy identifies that the setting of the South Downs National Park (SDNP) and, to a lesser extent, the setting of the Surrey Hills Area of Outstanding Natural Beauty are key landscape considerations. The key message of the policy is that "development proposals must conserve and where possible enhance the special characteristics, value and visual amenity of the Area's landscape". The inclusion of enhancement where possible is notable, as this potentially sets a high bar for development in terms of design, layout and massing given the landscape sensitivity of much of the District.
- 9.139 Policy **S17** (Development in the countryside) establishes the importance of protecting the intrinsic characteristics of the countryside of East Hampshire, with protection "for its landscape" a central platform of the policy. In this context it is notable that the supporting text notes that "significant growth is planned to occur on land which was previously designated as countryside" but that this will avoid impacting the "separate identities of our settlements".
- 9.140 Policy S27 (Design and local character) identifies the importance of respecting and complementing the distinctive character found within the District's settlements and in its rural areas. The policy says that permission will be granted for development where it "would help to establish a strong sense of place, by reinforcing or enhancing local character, and would function well with its surroundings". This is an important recognition of the role that individual buildings or schemes play in contributing to their wider townscape setting.
 - In addition to setting the strategic principles considered necessary to establish, maintain and enhance a sense of place and local distinctiveness, the policy sets out detailed design guidance for new development. The supporting text of Policy S27 also supplements Policy S18's protection of the setting of the SDNP by stating that "great weight will be given to conserving the landscape and scenic beauty of the South Downs National Park".
- 9.141 Policy **\$28** (Heritage assets and the historic environment) has implications for townscape, as many of the District's settlements have a historic core's or a townscape informed by historic character. The policy seeks the protection, conservation and enhancement of designated and non-designated heritage assets for "the contribution they make to local distinctiveness and sense of place".

9.142 Policy **DM33** (Conservation areas) supplements Policy S28 in terms of townscape, with paragraph DM33.4c noting that development should have regard for "the impact of the proposal on the townscape, roofscape, skyline, landscape and relative scale and importance of buildings in the area".

Appraisal of the plan as a whole

- 9.143 The South Downs National Park is a significant feature within East Hampshire District and it is appropriate that the draft plan attaches great weight to conserving the landscape and scenic beauty of the Park and its setting. The spatial strategy recognises this as far as it is able, directing significant growth to within or adjacent to the existing urban area of Whitehill & Bordon which is away from the immediate influence of the SDNP. However, the inclusion of a new settlement option in a rural area in close proximity to the SDNP has clear potential for negative effects on its setting. There is potential for both positive and negative effects on landscape in localised areas across the District and it is difficult to conclude with any certainty what the residual effect for the landscape character of the District as a whole will be. The spatial strategy directs the majority of development outside of strategic growth at Whitehill & Bordon and Northbrook Park to locations within or adjacent to existing urban areas and this will likely help ensure negative landscape effects are minimised. It is noted that part of the plan area falls within the setting of the Surrey Hills AONB. It is considered that as development is directed elsewhere in the District the plan is unlikely to have an effect on the AONB or its setting.
- 9.144 Although there are a number of site allocations with a degree of likely or potential landscape sensitivity, as noted above, the plan as a whole includes strategic and detailed policies aimed at mitigating negative effects and it is considered that these are comprehensive and proportionate, identifying areas at particular risk and establishing design criteria aimed at minimising harm and maximising gain at all sites. Therefore, although the draft plan has the potential for both positive and negative effects on landscape there is potential for sufficient mitigation to be achieved through high quality design and layout where required. It is also acknowledged that there could potentially be opportunities to enhance the landscape setting of some parts of the plan area, such as at the western edge of Whitehill & Bordon via the new strategic SANG allocation. However, it is considered that there is potential for minor negative effects at prominent greenfield sites at the edge of settlements, particularly at Alton, Lovedean and, potentially, south of Liphook. However, it is considered that the draft plan is likely to have an overall positive effect on townscape, particularly in light of the significant potential for townscape enhancement at Whitehill & Bordon via site SA9 (Whitehill & Bordon Strategic Development Area). Similarly, transformation of site SA18 (Molson Coors Brewery) will provide an outstanding opportunity to deliver positive townscape effects in central Alton, and the high level of protection required by the draft plan will see existing historic assets and character areas safeguarded from negative effects where possible.
- 9.145 Overall, when effects on landscape and townscape are balanced, it is considered that the draft plan is likely to have **no significant effect on landscape and townscape**.

Resources

9.146 There is a need to avoid unnecessary loss of higher quality 'best and most versatile' (BMV) agricultural land. The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality.

Commentary on spatial strategy

Policy S1

- 9.147 Whilst recognising that the national dataset on ALC is of poor resolution, it is possible to identify in general terms that the spatial strategy performs well in relation to the highest quality land, with development directed away from any areas of Grade 1 or Grade 2 land. Whilst much of the District is within Grade 3 agricultural land the spatial strategy directs the majority of growth to non-agricultural land at Whitehill & Bordon, avoiding significant effects as a result. Northbrook Park is within Grade 3 agricultural land, though little of the area is currently in productive agricultural use.
- 9.148 The adopted Hampshire Minerals and Waste Plan (HWMP) (2013) identifies several Minerals Safeguarding Areas (MSA) within the plan area as a whole, though only one of these appears notable in terms of the spatial strategy see Figure 9.1 below.

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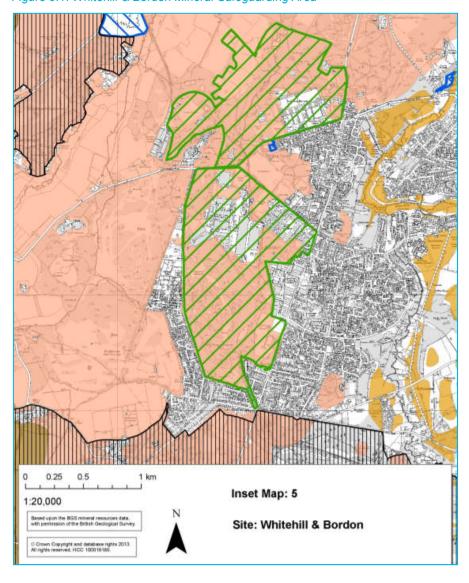


Figure 9.1: Whitehill & Bordon Mineral Safeguarding Area²²

9.149 As evident from Figure 9.1, a substantial area at Whitehill & Bordon is safeguarded for potential future soft sand extraction, including the majority of the central, western and northern Whitehill & Bordon sites. The HMWP notes that the area is designated for the "safeguarding of important soft sand reserves (with potential for silica sand) to prevent their sterilisation before developing the planned Eco-town. The area is safeguarded in Policy 15 (Safeguarding - mineral resources) of the Plan".²³ However, it is significant that recent development at Louisburg Barracks in the same MSA was delivered after detailed analysis showed that prior extraction of minerals in the area was not practicable.²⁴ It is therefore considered that despite directing growth to a MSA, the spatial strategy's performance in terms of resources remains strong.

Allocations

9.150 Site SA9 (Whitehill & Bordon Strategic Development Area) includes sites within the identified Whitehill & Bordon MSA though this is not identified within the wording of the policy. Site SA9 includes site SA10 (Louisburg Barracks) and site SA11 (Bordon Garrison) and both are also therefore largely within the MSA yet also do not identify this within the wording of the policy. However, it is acknowledged an earlier phase of development at these locations has already commenced and in this context the MSA is less of a consideration for the draft plan.

²² Hampshire County Council (2013), "*Mineral Safeguarding Area – Whitehill & Bordon*" [online], available from: http://documents.hants.gov.uk/mineralsandwaste/HMWPMineralSafeguardingArea-WhitehillBordon.pdf

²³ Hampshire County Council (2013), Hampshire Minerals and Waste Plan [online], available from: http://documents.hants.gov.uk/mineralsandwaste/HampshireMineralsWastePlanADOPTED.pdf

²⁴ AECOM (2015), Louisburg Barracks Minerals Statement Technical Note [online], available via search from: https://planningpublicaccess.easthants.gov.uk/onlineapplications/applicationDetails.do?activeTab=documents&keyVal= EHANT_DCAPR_232708

9.151 Site SA21 (Land at Northbrook Park) is located largely within an area of Grade 3 agricultural land, though this has not been surveyed for sub-division into 3a and 3b. Although, as noted above, the area is not currently in productive agricultural use this does not necessarily mean the land is inherently unsuitable for agriculture. As the draft plan allocates strategic development at Northbrook Park it could be important to conduct surveys to establish whether the land is Grade 3a (and therefore 'best and most versatile') or 3b as this could have potential implications for the layout of development within the allocation. The policy does not currently identify this as a potential constraint.

9.152 A number of non-strategic sites are located within areas of Grade 3 agricultural land. The most significant of these in terms of the quantum of proposed housing delivery are site SA19 (Land at Brick Kiln Lane & Basingstoke Road), allocated for between 171 and 255 dwellings, and site SA25 (Land South of Winchester Road, Four Marks), allocated for between 130 and 150 dwellings. Unlike Northbrook Park, both of these smaller sites are currently in productive agricultural use which would be lost through development. Neither site allocation currently acknowledges this. It could be important to establish whether the land is Grade 3a or 3b to help inform the developable area of the allocation.

Commentary on other policies

- 9.153 Policy S9 (Gypsies, travellers and travelling showpeople accommodation) is the only strategic policy which explicitly considers the need for adequate provision of recycling/waste management infrastructure and naturally this is in the context of new gypsy and traveller sites. It is notable that there is no other waste management policy in the draft plan. Appendix 6 (Table of Local Plan superseded policies) notes that the existing local plan policy on waste, Policy P7 (Contaminated Land, Waste Management) is deleted in the draft plan and not superseded. It is not clear why site allocations for the settled community do not also have this consideration or why gypsy and traveller sites have been specifically identified as requiring waste management provision. It is recommended that a fuller explanation is provided for this divergent approach to waste and recycling considerations at site allocations.
- 9.154 Policy **S19** (Biodiversity, geodiversity and nature conservation) establishes protection for the District's "range of rocks, minerals, fossils, soils and landforms", requiring new development to demonstrate that "it does not result in the loss of irreplaceable habitats and/or deterioration in geodiversity".
- 9.155 Policy **S26** (Protection of natural resources) seeks the protection and prudent use of all the District's natural resources. Key messages from the policy can be found at following paragraphs of the policy, which each require development proposals to demonstrate that they:
 - Paragraph S26.1 (a): "do not give rise to soil contamination".
 - Paragraph S26.1 (d): "avoid the best and most versatile agricultural land unless the benefits of the proposal outweigh the need to protect the land for agricultural purposes".
 - Paragraph S26.1 (e): "do not sterilise mineral resources identified as of particular importance unless it can be demonstrated that it would not be practicable and environmentally feasible to extract the identified mineral resource prior to development taking place".
- 9.156 The supporting text of policy S26 is clear that "development affecting the best of and most versatile agricultural land will not be permitted unless there is an overriding demonstrable need for the development". The supporting text also notes that where a proposal lies within a MSA the applicant should consult with Hampshire County Council in its capacity as Minerals Planning Authority to establish the extent of the resource and potential need for assessment and extraction.

Appraisal of the plan as a whole

- 9.157 Overall the plan performs well, with development concentrated at land not in agricultural use, leaving the highest value agricultural land largely unaffected by development as a result. By particularly focussing growth at Whitehill & Bordon the plan takes advantage of significant opportunities to recycle poor quality, vacant urban land which reduces the amount of land take necessary at greenfield sites. Where greenfield land is allocated for development, it is largely directed away from land in productive agricultural use even where the agricultural land dataset indicates the presence of higher quality land.
- 9.158 A number of strategic policies in the plan establish protection in principle for the District's natural resources, including best and most versatile agricultural land, minerals deposits and geodiversity. This is considered a robust position from which to help ensure the efficient and sustainable use of resources.

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9.159 Overall, in light of the above, the draft plan is predicted to lead to **no significant positive or negative**effects.

Water

Commentary on spatial strategy

Policy S1

By directing the majority of growth away from the south of the District, Policy **S1** steers development away from areas most affected by groundwater source protection zones (SPZs). This is particularly the case in terms of strategic development, as the absence of significant growth being directed to the southern parishes means that the largest sites are away from areas where they might directly affect potable water supplies via SPZs. However, Portsmouth Water has indicated that when requirements to 2040 are accounted for there will be a surplus of water available. By contrast, South East Water's draft 2019 Water Resource Management Plan suggests there would be deficits in the supply/demand balance that would become apparent by the mid-2040s. In the context of a spatial strategy which focusses growth towards the more constrained north of the District, this suggests that efforts to reduce and manage water demand will be required in the northern parts of East Hampshire to help mitigate the risk of water supply restrictions. Despite this consideration, the constrained capacity in the northern sub-areas presents an opportunity for development to deliver the highest standards of water management efficiency, potentially including innovative techniques such as rainwater harvesting and greywater recycling.

Allocations

- 9.160 A small number of non-strategic allocations are located within groundwater source protection zones. In these instances the associated constraint and high level mitigation is identified, except in the case of site **SA18** (Molson Coors Brewery) which falls partially within SPZ 1 without identifying this.
- 9.161 Site **SA33** (Land East of Horndean) is notable as the only site which specifically identifies turbidity as a local water quality issue. It is not immediately clear what characteristics at SA33 make turbidity an issue unique to the site, though **SA30**, **SA32**, **SA34**, **SA35**, **SA36**, **SA37**, **SA39**, **SA40** and **SA41** also identify potential contamination of the aquifer as a constraint, and seek mitigation as appropriate.
- 9.162 Site **SA9** (Whitehill & Bordon Strategic Development Area), and by extension site **SA10** (Louisburg Barracks) and site **SA11** (Bordon Garrison), will deliver significant levels of new development in an area of water stress. There is little direct acknowledgement of this in the wording of the site allocations, but SA11 does note that "the Council is working with key infrastructure providers ... to determine exactly what infrastructure is required to support the proposed development". This suggests that at this early stage the full implications for water infrastructure and water resource management from new development may not be fully known though it is positive the council are engaging with the relevant infrastructure providers. The same also applies at site **SA21** (Land at Northbrook Park).

Commentary on other policies

- 9.163 Policy **S26** (Protection of natural resources) seeks to ensure that the District's "natural resources remain safe, protected, and prudently used" and this has a number of implications for water, notably:
 - paragraph S26.1 (a) says development proposals should demonstrate that they "do not give rise to ... water pollution";
 - paragraph S26.1 (c) says that development proposals should "not result in a reduction in the quality or quantity of groundwater resources; this includes the protection of principal aquifers and the source protection zones associated with public supply boreholes within the southern part of the District"; and
 - paragraph S26.1 (f) requires development proposals to demonstrate "how the proposals will contribute
 to the EU Water Framework Directive or its equivalent, and the relevant River Basin Management
 Plan(s), which require the restoration and enhancements of water bodies to prevent deterioration and
 promote recovery of water bodies".

9.164 Policy **S31** (Havant thicket reservoir) supports delivery of a key piece of water infrastructure, necessary to "meet the demand for increased water supply in the south-east in the future". In the context of significant water stress in the wider south east region, and in particular in the South East Water supply area, this will be a critical asset to help ensure future sustainable water management. Although the reservoir will fulfil a secondary role as a significant water recreation resource, the policy specifically precludes motorised water sport as an acceptable use on the basis that preserving water quality is the primary concern.

- 9.165 Policy **DM28** (Resource efficient design) is notable for the ambitious water efficiency standard that new development is expected to achieve. Paragraph DM28.2 (g) requires new housing "to demonstrate that it meets a water efficiency standard of no more than 110 litres per person per day" (unless not technically feasible or financially unviable). This is considerably lower than the current national average usage of 140 litres per person per day and represents a positive and ambitious target.²⁵
- 9.166 Policy **DM29** (Water quality and water supply) seeks to ensure that development does not compromise the ability to meet Water Framework Directive objectives and to manage growth "in such a way that provision of water resources and wastewater treatment does not cause the water environment to deteriorate". The draft plan does not identify specific concerns in relation to wastewater treatment, though policy DM29 sets out criteria which should be met to ensure that development does not give rise to concerns in the future. This includes phasing development appropriately should it require new water and/or wastewater infrastructure. Notably, the policy also requires development to "minimise water use as far as practicable by incorporating appropriate water efficiency and water recycling measures". It is considered that this represents an important mitigation measure as improving water efficiency will be central to ensuring the sustainability of new development, and it is considered that this is a notable positive of the draft plan.

Appraisal of the plan as a whole

- 9.167 The spatial strategy performs well, with the draft plan ensuring the majority of new development will be delivered away from areas of the greatest water quality sensitivity. Significantly, this means that there will be no strategic development in an SPZ, which is a notable positive. Nevertheless, ten non-strategic sites identify a potential risk of contamination of the aquifer from development and highlight the associated need to mitigate this risk.
- 9.168 The draft plan does not flag capacity issues at wastewater treatment works which serve the District. Nevertheless, it establishes a range of policy criteria aimed at ensuring the continued sustainability of wastewater management in the District. The ambitious water efficiency target set out in policy DM28 is positive, though this ambition might better feed through into site allocation policies, particularly in the water stressed northern areas of the District.
- 9.169 Given the existing level of water stress in much of the plan area, particularly in the northern parts of the District, it would be difficult to conclude that the plan will have positive effects overall. However, support for the delivery of the Havant Thicket Reservoir will help unlock additional supply and enhance overall resilience. In this context it is considered that the plan is likely to have no significant positive or negative effect in respect of supporting sustainable water quality management and water quality enhancements on the assumption that the Havant Thicker Reservoir is delivered in a timely fashion.

²⁵ Source: Defra (2018), "25 Year Environment Plan" [online], available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

Part 3: What are the next steps?

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10. Plan finalisation

Preparation of the Proposed Submission Plan

10.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and further appraisal work.

10.2 The SA Report will be published alongside the Proposed Submission Plan. It will provide all of the information required by the SEA Regulations 2004.

Submission and examination

- 10.3 Once the period for representations on the Proposed Submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.4 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared (alongside SA) and then subjected to consultation (with an SA Report Addendum published alongside).
- 10.5 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must published that sets out (amongst other things) 'the measures decided concerning monitoring'.

11. Monitoring

- 11.1 The SA Report must present 'measures envisaged concerning monitoring'.
- 11.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on -
 - · perceptions of landscape;
 - · loss of best and most versatile agricultural land;
 - · community infrastructure delivery and capacity;
 - wastewater treatment works capacity;
 - achievement of 'biodiversity net gains' at appropriate scales;
 - · impacts to the setting of listed buildings; and
 - delivery of decentralised low carbon heat/energy generation, and other measures for minimising CO₂ emissions from the built environment and transportation.

Part 3 87

Appendix I: Regulatory requirements

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations the SA Report must include
Introduction	What's the plan seeking to achieve?		An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	 Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	 Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	 Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		 Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		 The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		A description of the monitoring measures envisaged

Table B: Questions answered by this SA Report, in-line with regulatory requirements

Schedule 2

The report must include...

The report must include...

Interpretation of Schedule 2

(a) an outline of the contents, main objectives An outline of the contents, main of the plan and relationship with other relevant i.e. answer - What's the objectives of the plan and plans and programmes; plan seeking to achieve? relationship with other relevant plans and programmes (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan Any existing environmental problems which are relevant to the (c) the environmental characteristics of areas plan including, in particular, those likely to be significantly affected; relating to any areas of a particular i.e. answer - What's the (d) any existing environmental problems which environmental importance 'context'? answer - What's the scope of the SA? are relevant to the plan or programme The relevant environmental including, in particular, those relating to any protection objectives, established at areas of a particular environmental international or national level importance, such as areas designated The relevant aspects of the current pursuant to Directives 79/409/EEC and state of the environment and the 92/43/EEC; likely evolution thereof without (e) the environmental protection objectives, implementation of the plan' established at international, Community or The environmental characteristics of Member State level, which are relevant to the i.e. answer - What's the areas likely to be significantly plan and the way those objectives and any affected 'baseline'? environmental considerations have been Any existing environmental taken into account during its preparation; problems which are relevant to the plan including, in particular, those (f) the likely significant effects on the relating to any areas of a particular Ġ environment including on issues such as environmental importance biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material Key environmental problems / i.e. answer - What are assets, cultural heritage including architectural the key issues & issues and objectives that should be and archaeological heritage, landscape and a focus of appraisal objectives? the interrelationship between the factors; An outline of the reasons for (g) the measures envisaged to prevent, reduce and as fully as possible offset any selecting the alternatives dealt with (i.e. an explanation of the significant adverse effects on the environment reasonableness of the approach) of implementing the plan; The likely significant effects i.e. answer - What has Plan-(h) an outline of the reasons for selecting the associated with alternatives, making / SA involved up to alternatives dealt with and a description of including on issues such as.. this point? how the assessment was undertaken including any difficulties (such as technical and an outline of the reasons for [Part 1 of the Report] selecting the preferred approach in deficiencies or lack of know-how) encountered light of the alternatives considered / in compiling the required information a description of how environmental (i) a description of the measures envisaged objectives and considerations are concerning monitoring. reflected in the draft plan. The likely significant effects associated with the draft plan i.e. answer - What are the The measures envisaged to assessment findings at this prevent, reduce and as fully as current stage? possible offset any significant [Part 2 of the Report] adverse effects of implementing the draft plan

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A description of the measures

envisaged concerning monitoring

i.e. answer - What happens

[Part 3 of the Report]

Whilst Tables A and B signpost <u>broadly</u> how/where this report meets regulatory requirements. Table C aims to present a discussion of <u>more precisely</u> how/where regulatory requirements are met.

Table C: 'Checklist' of how and where (within this report) regulatory requirements are being met.

Regulatory requirement Discussion of how requirement is met Schedule 2 of the regulations lists the information to be provided within the SA Report a) An outline of the contents, main objectives Chapter 2 ('What's the plan seeking to achieve') presents this information. of the plan or programme, and relationship with other relevant plans and programmes; These matters were considered in detail at the b) The relevant aspects of the current state of the environment and the likely evolution scoping stage, which included consultation on a thereof without implementation of the plan Scoping Report. The Scoping Report was updated or programme; post consultation, and is available on the website. The outcome of scoping was an 'SA framework', c) The environmental characteristics of areas and this is presented within Chapter 3 ('What's the likely to be significantly affected; scope of the SA'). Also, more detailed messages d) Any existing environmental problems which from the Scoping Report (context and baseline are relevant to the plan or programme review) are presented within Appendix II. including, in particular, those relating to any areas of a particular environmental importance...; e) The environmental protection, objectives, The Scoping Report presents a detailed context established at international, Community or review, and explains how key messages from the national level, which are relevant to the context review (and baseline review) were then plan or programme and the way those refined in order to establish an 'SA framework'. objectives and any environmental, The SA framework is presented within Chapter 3 considerations have been taken into ('What's the scope of the SA'). Also, messages account during its preparation; from the context review are presented within appendix II. With regards to explaining "how... considerations have been taken into account" -• Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified inlight of alternatives appraisal (and other factors). f) The likely significant effects on the • Chapter 6 presents alternatives appraisal findings (in relation to the spatial strategy, which environment, including on issues such as is the 'stand-out' plan issue and hence that which biodiversity, population, human health, should be the focus of alternatives appraisal/ fauna, flora, soil, water, air, climatic factors, consultation). material assets, cultural heritage including Chapter 9 presents an appraisal of the Draft architectural and archaeological heritage, Plan. landscape and the interrelationship As explained within the various methodology between the above factors. sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.

Pagulatory requirement	Discussion of how requirement is met
Regulatory requirement	Discussion of how requirement is met
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	A range of recommendations are made as part of the draft plan appraisal presented in Chapter 9.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', with an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in-light of appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.
 i) description of measures envisaged concerning monitoring in accordance with Art. 10; 	Chapter 11 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the	draft plan, in-line with the following regulations
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside the Draft Plan, in order to inform the current consultation and next steps.
The SA Report must be taken into account, along plan.	side consultation responses, when finalising the
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	N/A at this stage

Appendix II: The SA Scope

The following table summarises the key issues for land-use planning in East Hampshire, particularly for the area outside of the South Downs National Park, over the period 2017-2036. This is drawn from information on the policy context for the emerging East Hampshire Local Plan (2017-2036) and on relevant social, environmental and economic indicators. Please see second draft of the SA Scoping Report, which is available on East Hampshire District Council's website (http://www.easthants.gov.uk/evidence-base) for full details. The key issues are shown alongside the relevant SA objectives, which respond to these issues and form part of the SA Framework included in Section 3 of this Interim Report.

Topic	Key issues	Key objectives
Biodiversity	Land use pressures have contributed to long-term declines in biodiversity.	Protect and enhance local, national and international nature conservation interests
	The District includes wildlife habitats of international and national importance. It includes a part of the South Downs National Park. The District's numerous protected habitats are fragmented but there is	Increase habitat connectivity and support improvements in biodiversity Contribute towards the maintenance and enhancement of green infrastructure
	recognised potential for increasing their connectivity and enhancing green infrastructure.	
Climate Change	Climate change continues to be an issue of international importance that requires reductions in the emission of greenhouse gases.	Support reductions in greenhouse gas emissions, including through the use of sustainable forms of transport, particularly in rural areas
	Although emissions are falling, per capita emissions of carbon dioxide of East Hampshire's residents tends to be high.	Reduce the need to travel by car and shorten the length and duration of journeys Respect the potential impacts of climate
	change in the	change in the location, design and layout of new development
	Climate change projections indicate the potential for rising annual temperatures and changing rainfall patterns, including increased rainfall in the winter and reductions in the summer.	
Community and Wellbeing	The population of the District is projected to increase and to become older.	Help to meet the changing needs of an ageing and growing population
	The number of households is projected to increase.	Support improvements to the health and well-being of the population
	An increasing number of residents are likely to identify day-to-day activities as being limited by health/disability.	Improve accessibility to facilities and services, and to green infrastructure, particularly in rural areas
	Relative deprivation is found in parts of Alton and Bordon.	

Topic	Key issues	Key objectives
	Preventable mortality rates are higher than for some adjoining Districts. Connectivity by footpaths and cycleways, between settlements and across rural areas, is variable across the District.	
Economy and Employment	East Hampshire forms part of two LEP areas, relating to the economies of south Hampshire and the M3 corridor. A large proportion of businesses in East Hampshire are micro or small businesses. Although the majority of jobs in East Hampshire are held by residents, there is significant out-commuting for work. There is a significant discrepancy between the average earnings of residents compared to the earnings of local workers. There has been a decline in the development of new employment floorspace in the District.	Improve accessibility to local employment and training opportunities Ensure a range of good quality employment sites are available to suit the needs of the district's businesses Ensure high and stable levels of employment
Heritage	Listed structures are found across the District, but there are higher concentrations in older settlements such as Alton, Bentley, Bentworth and Upper and Lower Froyle. A relatively small proportion of the listed structures have been assessed and found to be at risk (33 of 778 assets, outside of the South Downs National Park). Conservation areas in East Hampshire contribute to both the local townscapes and landscapes.	Protect and enhance the significance and special interest of heritage assets and cultural heritage of East Hampshire and their contribution to local character. Promote understanding, appreciation and care of, and access to, heritage assets.
Housing	Additional land is likely to be required for the period beyond 2028, to meet East Hampshire's housing needs. There is a long-term trend for housing in East Hampshire to become increasingly unaffordable. The provision of new affordable housing in the District has been less than the estimated annual requirement.	Ensure residents have the opportunity to live in homes that meet their needs, including for affordable housing

Topic	Key issues	Key objectives
Landscape, Townscape and Resources	East Hampshire has a complex geology and high quality, varied landscapes, with central areas forming part of the South Downs National Park. A significant proportion of the District is classed as best quality agricultural land. Threats to the landscapes include through lack of suitable land management and unsympathetic development, altering the historic form and character of settlements. There are mineral resources in the District, particularly in the north east.	Maintain and enhance the character of the District's rural landscapes and its settlements Support an efficient and sustainable use of the District's resources
Water and Flood Risk	Some waterbodies require water quality improvements and have a poor ecological status. The northern parts of East Hampshire are part of an area of serious water stress, where demand could eventually exceed supply, in the absence of interventions. There is some flood risk in areas close to watercourses and from groundwater sources.	Support sustainable water management and water quality enhancements in East Hampshire Avoid or reduce the risk of flooding for the District's population

Appendix III: Workshop meeting notes

As explained at paragraph 5.4, above, a series of workshops were held in summer 2018, with a view to informing the selection of reasonable spatial strategy alternatives. This appendix presents workshop notes.

Workshop 1

East Hampshire Local Plan 2017-2036 Sustainability Appraisal First Workshop for SA Options (16th July 2018) MEETING NOTE

Attendees: Kevin Thurlow (EHDC), Mark Fessey (AECOM), Jess Hill (EHDC), Katharine Stuart (SDNP), Mark Barnett (EHDC), Jon Holmes (EHDC), Julie Boschi (EHDC), Danielle Hall (EHDC), Hannah Goldsmith (EHDC), Nicola Waight (HCC), Ben Brookes-Martin (HCC), Hannah Collier (EHDC), Jennifer Winter (EHDC), Dan Grindey (EHDC), Charlotte Webb (HCC), Danielle Friedman-Brown (EHDC), Janie Millerchip (EHDC), Victoria Potts (EHDC), Heather Stevens (EHDC), Amanda Dunn (EHDC), Ian Mawer (EHDC), Thomas Beech (EHDC)

Notetaker: Jenny Woodgate (EHDC)

Agenda Item	Notes	
Introductions and Strategic Context	Following introductions, KT presented the strategic context for the emerging local plan for East Hampshire (outside of the South Downs National Park). The current development plan was noted, alongside the emerging South Downs Local Plan. A range of other inputs to plan-making were noted, including the strategies of local enterprise partnerships (economic development) and the Council's corporate strategy.	
2. Introduction to Sustainability Appraisal	MF (AECOM) described the statutory process of sustainability appraisal (SA) and how the workshops were to contribute towards defining a number of reasonable alternatives (options) for the local plan and in particular for its strategy on where new development should be directed.	
3. Development Requirements for the Local Plan	KT identified preliminary estimates for how many new homes; how much additional employment land; and how many new pitches/plots for the travelling community would be required to 2036 in East Hampshire. It was stressed that these were very preliminary findings and that the requirements could be greater. Land for around 5,000 new homes, up to 5ha of employment land, 41 plots and 14 pitches (i.e. travelling communities accommodation) may need to identified through the emerging local plan.	
4. Discussion of District-wide constraints & opportunities	Attendees contributed to a discussion of constraints and opportunities for the development of areas in the north, north east and southern parts of the District. Discussions included the following:	
	 Local demand for affordable housing in some of the rural villages (Ropley, Upper & Lower Froyle) appears to be low, in part due to the prohibitively high costs of housing and the desirability of other areas 	

Agenda Item	Notes
	concern the river corridors such as around Alton, whilst there is also groundwater flooding to consider in the river valleys and parts of the southern parishes (Horndean Springs).
5. Summing Up	KT noted that although overall implications had not been drawn out during the workshop, in relation to meeting total development requirements, EHDC & AECOM would consider the points raised in discussion for this purpose. Conclusions to be reported at the next workshop (Tuesday 14 th August). Attendees were reminded that subsequent workshops would focus in more detail on the particular issues for development in one part of the District and would be more site/settlement focused. More information in relation to these workshops would be sent out in advance.

End of Meeting Note
Author: Kevin Thurlow, based on notes by Jenny Woodgate (notetaker)
Date: 07/08/18

Workshop 2

East Hampshire Local Plan 2017-2036 Sustainability Appraisal Second Workshop for SA Options: Tuesday 14th August 2018 MEETING NOTE

Attendees: Kevin Thurlow (EHDC), Chris McNulty (AECOM), Mark Fessey (AECOM), Jess Hill (EHDC), Katharine Stuart (SDNP), Mark Barnett (EHDC), Jon Holmes (EHDC), Sabah Halli (EHDC), Julie Boschi (EHDC), Charlotte Lines (EA), Nicky McHugh (Thames Water), Alison Galbraith (Terra Firma), Jennifer Winter (EHDC), Charlotte Webb (HCC), Bob Coleman (EHDC), Sarah Hobbs (EHDC), Victoria Potts (EHDC), Ian Mawer (EHDC), Adam Harvey (EHDC), Joel Miller (HBIC) Notetaker: Jenny Woodgate (EHDC)

Agenda Item	Notes	Relevant LAA sites include
1. Introductions and Re-cap from First Workshop	Workshop 1 outcomes have been reviewed and where multiple constraints have been identified these sites have been put to one side, so that we may concentrate on those without too many constraints. From this initial sieve, it appears that the development needs could be met and so remaining workshops will be looking to define options for the Local Plan, to deliver estimated needs in full. In workshop 2, the focus will be on the view of the group regarding the constraints and opportunities in the A31 corridor and to the north.	N/A
2. Discussion of A31/the North constraints & opportunities	Attendees contributed to a discussion of constraints and opportunities for the development of areas in the north of the District, focusing on clusters of LAA sites. Discussions included the following: Ropley:	
	 There are potential impacts on designated heritage assets, if new development is directed to central areas (close to the church or the school). Small sites are also less viable for affordable benefits although interest in part. 	ROP-003, ROP- 005, ROP-008, ROP-009, ROP- 011, ROP-012 All except ROP- 010, ROP-011,
	 affordable housing, although interest in new affordable housing within Ropley likely to be low There is no mains sewerage in Ropley and 	ROP-007, ROP-
	no local wastewater treatment works, which is a strategic constraint	011, ROP-010
	Ropley is a sensitive area in landscape terms, keeping the existing (linear) pattern of development would be important	ROP-007, ROP- 008, ROP-009, ROP-011, ROP-

Agenda Item	Notes	Relevant LAA sites include
		017, ROP-018
	There is already congestion around schools because parents must drive their children to school (these are country lanes without/with limited pedestrian footways). The infrastructure needs to cope with additional traffic from new developments. Additional traffic will have an urbanising impact on this character.	All LAA sites, particularly ROP-007
	North of the railway line and to the west is a large SINC and directly to the east is ancient woodland, but not currently designated. New development could increase recreational pressure. Dormice are being found in the woodland and hedgerows and there is wildlife interest	ROP-007
	Four Marks & South Medstead:	
	Scope for further development depends on local road network improvements and the capacity of existing community infrastructure. Local junctions (Lymington Bottom Rd & Boyneswood Rd) are under pressure and there are difficult "pinchpoints" associated with the railway. The pressure is on to keep the A31 flowing freely.	All LAA sites, particularly MED-024, MED- 016, MED-022
	There is historic evidence of flooding associated with the drainage network.	All LAA sites in Four Marks
	Rural character (e.g. the distinctive field pattern) should be respected to the south of Four Marks, whilst development that would create a "hard edge" to the SDNP boundary would be inappropriate. Development of areas to the north of South Medstead could have more significant visual impacts.	FM-005, FM- 0004, FM-010, FM-001, FM- 024, FM-020, FM-021 MED-024, MED- 023, MED-017
	Beech	
	There are very few services/facilities in the village, and limited demand for affordable housing. The existing residential character (low density, lots of mature green infrastructure) counts against intensification through new development; although the village is well-contained within the	All LAA sites in Beech

Agenda Item	Notes	Relevant LAA sites include
	landscape.	
	The large number of trees and ancient woodland to the south could provide suitable habitat for bats. Loss of local green infrastructure should be avoided.	BEE-008, BEE- 005
	Alton & Environs	
	Good woodland structure and local topography provide a context for some development at Chawton Park Farm.	CHA-005
	Chawton Park Farm adjoins two SINCs which are also ancient woodland, which raises concerns over recreational pressure, but potential for some mitigation through establishment of connecting green links.	CHA-005
	Development on the northern fringes of Alton and in close proximity to the A31 could have landscape and visual impacts impacts/damage the town's setting. Also some concerns regarding impacts on rural settings of listed buildings.	AL-005, AL-018, AL-014, AL-020, AL-021
	 Areas to the south of the A31 are more sensitive to new development (rural character and proximity to the South Downs National Park). 	AL-017, WOR- 002, WOR-003
	The rural setting of Holybourne and its conservation area, together with the presence of ancient monuments to the east, are significant constraints for development. The historic settlement pattern is linear, whilst many of the promoted sites would lead to a departure from this.	AL-009, AL-010, AL-007, AL-011, AL-012
	Froyle	
	The historic character and landscape setting of Upper Froyle are major constraints to development. There is potential for significant adverse impacts on rural landscape character.	FRY-001 FRY-001, FRY-
	Upper/Lower Froyle are not good locations for affordable housing, being too remote	002

Agenda Item	Notes	Relevant LAA sites include
	from services and facilities and in an area of very high house prices (difficult to provide affordable housing at prices that are genuinely affordable to those on low incomes).	
	Bentley & Environs	
	There is landscape capacity for development in pockets around the village, but the development of all promoted sites would be inappropriate.	All LAA sites in Bentley
	Sites to the south of the village core are in/adjacent to the conservation area and contribute to its setting. It is important to retain key views from the south.	BEN-011, BEN- 012
	Historic ecological surveys have identified great crested newts at Bentley Pond – although there is no obvious foraging habitat nearby.	BEN-006, BEN- 010, BEN-001
	The potential for odour impacts from the sewage treatment works would need to be investigated for sites in close proximity.	BEN-008, BEN- 006, BEN-010 BEN-004, BEN-
	Hole Lane is a sunken lane and contributes to local (rural) character but reduces site accessibility.	003
	 Northbrook Park, as a proposed new settlement, has multiple constraints. There is potential for landscape impacts, particularly in areas to the south of the A31, and the site is close to the boundary with the South Downs National Park. There are significant areas of flood risk, particularly to the south of the A31. 	BEN-007
	Northbrook Park is within 5km of the Thames Basin Heaths SPA, so there will be a need for SANG to address potential recreational impacts on the SPA.	BEN-007
	The SINC woodland adjoining the promoted site at Northbrook Park is high quality and there is ancient woodland on site. However, development could support biodiversity enhancements to the River Wey corridor	

Agenda Item	Notes	Relevant LAA sites include
	(which is a Biodiversity Action Plan priority area).	BEN-007
	Development could have adverse impacts on the setting and context for heritage assets (listed buildings) which are located in this area.	BEN-007
	Unclear whether wastewater drainage would be to Bentley or Farnham, but Bentley would likely require upgrading to accommodate the scale of development proposed at Northbrook Park.	BEN-007
	Due to the promoted site's isolation, there is little risk of coalescence of a new settlement at this location with either Bentley or Farnham.	
5. Summing Up	Attendees were thanked for their participation and reminded that subsequent workshops would focus in more detail on the particular issues for development in the north east and southern areas of East Hampshire. More information in relation to these workshops would be sent out in advance.	N/A
	KT agreed to send out GIS layers showing the Land Availability Assessment sites that are being promoted for development, to those attendees whom are also involved in projects contributing to the Local Plan.	

End of Meeting NoteAuthor: Kevin Thurlow, based on notes by Jenny Woodgate (notetaker)

Workshop 3

East Hampshire Local Plan 2017 – 2036 Sustainability Appraisal Third Workshop for SA Options: Thursday 16th August 2018 NOTES

Attendees: Kevin Thurlow (EHDC), Mark Fessey (AECOM), Jess Hill (EHDC), Isla Denton-Thompson (Terra Firma), David Lindsay (EHDC), Jon Holmes (EHDC), Danielle Hall (EHDC), Hannah Goldsmith (EHDC), Julie Boschi (EHDC), Charlotte Lines (EA), Roger Burton (EHDC), Jennifer Winter (EHDC), Hannah Collier (EHDC), Charlotte Webb (HCC), Sarah Hobbs (EHDC), Victoria Potts (EHDC), Joel Miller (HBIC), Martin Small (Historic England), Martin Trust (Portsmouth Water)

Notetaker: Jenny Woodgate (EHDC)

Agenda Item	Notes	Relevant LAA sites include
1. Introductions and Background	Workshop 2 focused on the constraints and opportunities for development in the A31 corridor and in areas to the north. In workshop 3, the focus will now be on the constraints and opportunities in the southern parishes of East Hampshire (those parts of Clanfield, Horndean and Rowlands Castle parishes outside of the South Downs National Park).	N/A
2. Discussion of southern parishes constraints & opportunities	Attendees contributed to a discussion of constraints and opportunities for the development of areas in the southern parts of the District, focusing on clusters of LAA sites. Discussions included the following:	
	Clanfield:	
	The South Downs National Park boundary skirts the northern edge of the settlement and there are high points with potential views of the sites. Development at White Dirt Farm could be visually intrusive due to local topography.	CL-001, CL-002, HD-009
	 Local services and facilities are limited, but new community facilities are being provided as part of new housing 	CL-001, CL-002, HD-009, HD-017
	 The sites have limited biodiversity value, but potential impacts on heritage (listed buildings and non-scheduled archaeological interests) should be considered. 	CL-001, CL-002

Agenda Item	Notes	Relevant LAA sites include
	The rural setting of Catherington/the conservation area is sensitive to change, but areas of northern Horndean have a raw/abrupt edge, where the built form is not well-integrated with the open countryside. This could be improved through sensitively designed new development.	HD-002, HD- 007, HD-005, HD-004, HD- 008, HD-022, HD-018
	The biodiversity value of this area could be increased by improving linkages to the wider countryside.	HD-005, HD- 004, HD-008, HD-018, HD-011
	 There is a general lack of facilities in Horndean (considering its size). Development of the Part 2 Local Plan allocation is likely to improve the situation. 	All Horndean sites
	Lovedean & Cowplain:	
	Yoell's Copse and James's Copse are areas of ancient woodland and are designated SINCs. These sites would be sensitive to recreational pressure, whilst Yoell's Copse could become isolated by the development of some of the promoted sites. This is likely to have an adverse impact on the biodiversity value of the site. The woodland areas are likely to be used by bats.	HD-020, HD- 006, HD-021, HD-024 HD-020, HD-006
	There is a risk that substantial development on Lovedean Lane could alter the character of this area (the sense of transition between urban and rural environments). Sites closer to the South Downs National Park boundary are more sensitive	HD-001, HD- 003, HD-015, HD-021, HD- 019, and in particular: HD- 013, HD-014
	East and Southeast of Horndean:	
	There are significant heritage constraints to the east of the A3(M) (listed buildings at Cadlington House, Pyle Farm, Crookley Park and Blendworth Conservation Area). This area has a strong rural character which	HD-016, HD-010

Agenda Item	Notes	Relevant LAA sites include
	contributes to the setting of the National Park, Conservation Area and listed buildings. There is very limited capacity for new development.	
	This area is close to known habitats of Bechstein bats. There are opportunities to enhance wildlife habitat, with the local presence of mature woodland used as a basis for new linkages for green infrastructure. The area is too far north for Brent geese.	RC-009, HD-012
	Land to the south of the Part 2 Local Plan allocation is subject to some areas of flood risks and there could be unstable ground conditions (sink holes) associated with groundwater. The site is quite well-contained within the landscape.	RC-009
	 A new reservoir at Havant Thicket is planned for development over the plan period. New development could facilitate the provision of new green infrastructure and could be developed with the Part 2 Local Plan allocation in a coherent manner, to deliver additional facilities and services. 	RC-009, HD-012
	Rowlands Castle:	B0 000 B0
	 Many of the promoted sites are close to the Shipwrights Way. There is a need to avoid urbanising this rural part of the route, but linkages could be provided. 	RC-003, RC- 005, RC-004, RC-010
	 Land east of Rowlands Castle has a low capacity for development. New development could be visible from the trainline and the South Downs National Park. 	RC-005, RC- 010, RC-003
	Bechstein's bats are likely to be found throughout this area (foraging and roosting).	RC-001, RC- 005, RC-003, RC-010, RC- 002, RC-004
	Sites close to the centre of Rowlands Castle are near to/adjoin a scheduled ancient monument and adverse impacts	RC-006, RC-007

Agenda Item	Notes	Relevant LAA sites include
	 There are historic groundwater flooding problems in eastern areas, and there are potential impacts from development on the Blendworth Springs. There is potential for on-site flood alleviation to have downstream effects (to increase flood risk in Havant Borough). There could be unstable ground conditions (sink holes) associated with groundwater. 	RC-005, RC- 010, RC-003
5. Summing Up	Attendees were thanked for their participation and reminded that the next and last technical SA workshop would focus in more detail on the particular issues for development in the north east area of East Hampshire. More information would be sent out in advance.	N/A

End of Meeting NoteAuthor: Kevin Thurlow, based on notes by Jenny Woodgate (notetaker)

Workshop 4

East Hampshire Local Plan 2017 – 2036 Sustainability Appraisal Fourth Workshop for SA Options: Wednesday 22nd August 2018 NOTES

Attendees: Kevin Thurlow (EHDC), Mark Fessey (AECOM), Chris McNulty (AECOM), Jess Hill (EHDC), Keith Baker (Terra Firma), Adrian Ellis (EHDC), Nicky Court (HCC), David Lindsay (EHDC), Katherine Pang (EHDC), Hannah Goldsmith (EHDC), Charlotte Webb (HCC), Victoria Potts (EHDC), Pennie Brown (EHDC), Danielle Friedman-Brown (EHDC), Ian Mawer (EHDC), Katharine Stuart (SDNP), Adam Harvey (EHDC), Amanda Dunn (EHDC), Andy Shaw (HCC)

Notetaker: Jenny Woodgate (EHDC)

Agenda Item	Notes	Relevant LAA sites include
1. Introductions and Background	Workshop 4 is the last of the area-specific technical workshops for the SA. The previous workshops have focused on the constraints and opportunities for development in the A31 corridor/north of the District and the southern parishes. In workshop 4, the focus will now be on the constraints and opportunities in Whitehill & Bordon and in other parts of the north east of the District (outside of the South Downs National Park).	N/A
2. Discussion of North East constraints and opportunities	Attendees contributed to a discussion of constraints and opportunities for the development of areas in the north east of the District, focusing on clusters of LAA sites. Discussions included the following:	
	Whitehill & Bordon:	
	Development on the promoted additional sites at W&B would be close to the boundary with the South Downs National Park, but there is good woodland cover in this area to avoid/mitigate landscape impacts.	WHI-008, WHI- 011, WHI-010, WHI-007, WHI- 012
	Sites promoted for SANG include areas of SINC (which have biodiversity value). In some areas, positive management and the felling of trees could enable heathland restoration with biodiversity.	WHI-012, WHI- 013, WHI-007

Agenda Item	Notes	Relevant LAA sites include
	benefits. Bog woodland (Oxney Farm) should however be retained.	
	Sites to the west and east of Bordon are susceptible to flooding from the River Slea, River Wey and groundwater sources, but this is not considered to substantially affect the larger sites.	SEL-003, SEL- 001, SEL-005, WHI-002, WHI- 005, HEA-018
	 River Wey Conservation Area is a key heritage constraint in the east. It is predominately an open, rural landscape, so any development will need to be set back and be low density. 	HEA-018, HEA- 012, HEA-017, WHI-002
	 Sites to the east are within comfortable walking/cycling distance and should be integrated with the towns green grid/green loop, if developed. 	WHI-005, HEA- 018
	 Much of the land to the east of W&B has limited biodiversity value, as it is in agricultural use. Other land is designated as SINC and ancient woodland (higher biodiversity importance). New SANG should be linked to the Deadwater valley to achieve habit connectivity. 	HEA-018, WHI- 005
	No transport concerns raised at this stage, relating to the promoted sites. Further modelling would be required to determine impacts on the relief road, but the challenge is to get the existing town linked with the new town centre by way of cycleways and footways with more crossing points on the A325.	HEA-018, WHI- 005, WHI-009, WHI-017, WHI- 016, WHI-008, WHI-010, WHI- 011, WHI-015
	Lindford:	M/I II 000 I IN
	There is a risk of groundwater flooding in this area and fluvial flooding associated with the River Wey. Suitable land in this area should be put aside for biodiversity enhancements.	WHI-002, LIN-
	Headley Mill Conservation Area is in close proximity to some of the promoted sites. This is one of the oldest mills in	WHI-002, HEA- 017

Agenda Item	Notes	Relevant LAA sites include
	Hamphsire, with an open setting that could be adversely affected by development.	
	Biodiversity concerns in this area include the proximity of Wealden Heaths Phase 2 SPA.	LIN-001, LIN- 002
	Passfield:	
	 River Wey Conservation Area and Wealden Heaths Phase 2 SPA are significant (heritage and biodiversity) constraints in this area. 	LIP-024, LIP- 025, LIP-028, LIP-027, HEA- 012
	Further employment development could be achieved in this area without significant detriment to the constraints, depending on its size and design.	LIP-024, LIP- 025, LIP-027,
	There are fluvial flood risks in this area, but no groundwater flooding issues have been identified.	LIP-028
	Oakhanger:	LIP-027, LIP-028
	In addition to flood risks (River Slea) constraints for development include rural landscape character and proximity of the South Downs National Park. Estimates of local housing need are small.	SEL-001, SEL-
	Shortheath Common is a Special Area of Conservations so proposals would trigger the need for a Habitats Regulation Assessment on biodiversity impacts.	002, SEL-003 SEL-002
	 The local highway network is not suitable for substantial additional development (local lanes are narrow, some are sunken lanes). 	SEL-001, SEL- 002
	Liphook:	
	 Access to sites proposed to the north and south of A3 would appear to take access through the roadside services. 	

Agenda Item	Notes	Relevant LAA sites include
	This could have impacts on the strategic road network. There are areas of ancient woodland and SINC in this area, so there is also potential for adverse impacts on biodiversity. There are some fluvial flood risks.	LIP-029, LIP-030
	 Some sites are within 400m of the Wealden Heaths Phase 2 SPA and would be unsuitable for residential development (in whole or just for parts of the site). 	LIP-008, LIP- 014, LIP-029, LIP-030
	 Other sites are still within 5km of the SPA. The ability to provide accessible SANG is therefore an important consideration. 	LIP-017, LIP- 019, LIP-020, LIP023, LIP-022,
	 The potential impact of development on the River Wey Conservation Area (its rural character) will need to be taken into account. 	LIP-011, LIP- 015, LIP-021 LIP-014, LIP-
	 The potential impacts from development on the transport (road) network in the centre of Liphook are likely to be such that there is limited capacity for additional residential development. 	005, LIP-011 LIP-019, LIP- 020, LIP023,
	Sites to the southeast of Liphook form part of the setting of the SDNP, but there is varying levels of treecover that could provide some context for development. There is no testially provide a sound its form.	LIP-022, LIP- 011, LIP-015, LIP-021
	There is potentially more capacity for development adjoining the settlement, but perhaps less so in areas further east and south of the railway line. Liphook is an important entry to the national park and the National Park Authority has no proposals to allocate land for development in its adjoining areas.	LIP-017, LIP- 019, LIP-020, LIP023, LIP-022, LIP-021
	Constraints in the southeast include potential noise impacts (the railway line), flood risks from groundwater sources, the rural character and the capacity of local roads (Devil's Lane and Highfield Lane).	LIP-017, LIP-

Agenda Item	Notes	Relevant LAA sites include
	Griggs Green:	019, LIP-020, LIP023, LIP-022, LIP-021
	This area is within 400m of (sometimes directly adjoining) the Wealden Heaths Phase 2 SPA, so residential development is unlikely to be suitable. The Council/South Downs National Park Authority has an SPD that is based on gypsy/traveller/travelling showpeople accommodation being prioritised and there are relevant proposals in this area. Further Habitats Regulation Assessment work would be required.	All LAA sites in Griggs Green
	Grayshott:	
	There could be impacts from development on the setting of the Surrey Hills AONB, but of greater concern is the proximity of promoted sites to SSSIs and the Wealden Heaths SPA. There is ancient woodland in the area, which would be sensitive to increased public access.	GRY-002, GRY- 004
	Urbanisation and the loss of green infrastructure in this area is a concern, in connection with the green/rural setting of much of the area's residential development.	
	development. Headley Down:	GRY-003, GRY- 001
	There is a large unmet need for affordable housing in Headley parish (currently 64 households on the Home Choice register and over 20 on the Hampshire register).	
	 Although local roads are narrow, many of the sites are likely to be too small to cause a problem in terms of transport capacity. However, the change of character related to road network improvements should be taken into account. 	All sites in Headley Down HEA-010, HEA- 013
	Some sites are well-contained by areas	

Agenda Item	Notes	Relevant LAA sites include
	of woodland, which could mitigate any potential landscape impacts Headley:	HEA-011
	 There are some local facilities (e.g. a primary school) but the settlement pattern is dispersed. Constraints include potential impacts on heritage (there is a conservation area), but also biodiversity in terms of the settlement's proximity to parts of the Wealden Heaths Phase 2 SPA. 	All LAA sites in Headley
	 Achieving suitable access is a concern for all sites. Improvements to access roads could also change the character of the area (several sites are within a "special character area"). Holt Pound: 	HEA-002, HEA- 006, HEA-014, HEA-015, HEA- 016
	Development of the promoted sites could adversely affect the rural fringe, linear character of the existing settlement. Development would be dependent on areas in Waverley Borough for infrastructure/service needs	BIN-005, BIN- 002
	 Although tree cover limits long-distance views, urbanisation could reduce the rural gateway feel of this area, particularly if visible from public highway. Proximity of the national park is therefore a concern. 	BIN-005, BIN- 002, BIN-006, BIN-001
	Picketts Hill:	
	 All promoted sites are within 400m of the Wealden Heaths Phase 2 SPA, so are unlikely to be suitable for residential development. Employment use may be more suitable. Due to their proximity, employment uses could have adverse effects due to noise generating uses. 	HEA-007, HEA- 008, HEA-009, HEA-020 HEA-007, HEA- 008, HEA-009,

Agenda Item	Notes	Relevant LAA sites include
	Due to the local landscape character, development has the potential to cause adverse visual impacts in this area. Kingsley:	HEA-020 HEA-007, HEA- 008, HEA-009, HEA-020
	The development of a rural exception site has met the outstanding local requirement for affordable housing.	
	There are limited local facilities and the frequency of heavy goods traffic using the main road/narrow footways makes this a less attractive place for further residential development.	KIN-001, KIN- 003
	There are landscape constraints associated with views into the settlement from the South Downs National Park and biodiversity concerns relating to the proximity of the Wealdon Heaths Phase 2 SPA (Kingsley Common).	KIN-003
	There are flood risks associated with the Oxley Stream	KIN-002, KIN- 004
		KIN-001, KIN- 003
3. Summing Up	Attendees were thanked for their participation in this and previous workshops. They were reminded that their views would be used to inform the Council's selection of reasonable alternatives for appraising through the SA of the emerging East Hampshire Local Plan.	N/A

End of Meeting NoteAuthor: Kevin Thurlow, based on notes by Jenny Woodgate (notetaker)

Appendix IV: Site options GIS analysis

Introduction

As discussed at paragraph 5.60, above, site options were subjected to analysis using a Geographical Information System (GIS), as a means of gathering additional data to inform the discussion of site options, and ultimately inform the selection of reasonable alternatives for appraisal.

The aim of this appendix is to:

- 1) explain the appraisal methodology; and then
- 2) present the outcomes of the GIS analysis

Firstly, a discussion is presented under each of the SA topic headings. Secondly, a large table presents summary findings of the analysis for each site option.

Developing the site options appraisal methodology

It was not possible to simply appraise site options using the SA framework (i.e. the list of SA topics/objectives presented in Table 4.1, above), in the manner of the alternatives appraisal presented in Appendix III (above) and Appendix V (below). This is on the basis of site options being so numerous and limited data availability (i.e. there is not a sufficiently fine grained understanding of how baseline issues/opportunities vary across the District, to enable the merits of competing site options to be differentiated with confidence).

As such, work was undertaken to develop a GIS methodology suited to site options appraisal. The methodology essentially involves measuring the spatial relationship (in terms of distance and/or percentage overlap) between all site options and features within the landscape (both constraint features, e.g. SSSIs, and opportunity features, e.g. town centres) for which mapped data (i.e. a GIS 'layer') is available.

All distances are measured as a straight line, i.e. 'as the crow flies'. It is acknowledged that in some instances distances may add additional value if they could be calculated using driving and/or walking and/or cycling routes.

The aim was to develop a methodology that reflects the SA framework as closely as possible; however, there are inevitably data gaps, and therefore limitations to the methodology. These limitations are discussed further below, under each of the SA framework headings. Additionally, it should be noted that the site allocations carried forward from the current adopted Local Plan do not feature in this analysis.

Biodiversity

Several GIS layers for the District as a whole are available to enable analysis of the site options. Specifically, the available data enables the site options to be analysed in respect of: distance to nearest Special Protection Area (SPA); distance to nearest Site of Special Scientific Interest (SSSI); distance to nearest Site of Nature Conservation Interest (SINC); distance to nearest ancient woodland.

Table A (see below) presents summary findings of the analysis, categorising the performance of sites on a red/amber/green scale reflecting the spread of the data (and also an understanding that there are certain well established distance thresholds). The following bullet points give further consideration to the summary findings presented in Table A.

- Average distance to the nearest SPA = 6,361m, with 84 sites beyond 10km (dark green) and a further 69 sites between 10km and 5km/5.6km/7km²⁶ (light green). At the other end of the scale, 36 sites are within 400m of the SPA boundary (red) and a further 81 sites are between 400m and 5km/5.6km/7km²⁷ (amber).
- Average distance to the nearest SSSI = 2,897m, with 64 sites beyond 5km (dark green) and a further 75 are between 5km and 2km (light green). 49 sites are within 500m of a SSSI (red) and a further 82 sites are between 500m and 2km (amber).

²⁶ Depending on the established buffer zone of the nearest SPA.

²⁷ As per previous footnote.

Average distance to the nearest SINC = 295m, with 36 sites beyond 600m (dark green) and a further 77 between 600m and 300m (light green). 84 sites are within 100m of a SINC (red) and a further 73 sites are between 100m and 300m (amber).

Average distance to the nearest designated ancient woodland = 584m, with 148 sites beyond 500m (dark green) and a further 61 between 200m and 500m (light green). 30 sites are within 50m of a designated ancient woodland (red) and a further 31 sites are between 50m and 200m (amber).

Climate change adaptation

One GIS layers for the District as a whole is available to enable analysis of the site options. Specifically, the available data enables the site options to be analysed in respect of percent overlap with a flood risk zone, as defined by the Environment Agencies national dataset.

Table A (see below) presents summary findings of the analysis, categorising the performance of sites on a red/amber/green scale reflecting the spread of the data. The following bullet point give further consideration to the findings presented in Table A.

• Average overlap with Flood Zone 3 (at highest risk of fluvial flooding) is 2%. However, the vast majority of sites are unaffected by Flood Zone 3, and consequently 249 sites have 0% overlap (dark green). A further five sites have less than 1% overlap with Flood Zone 3 (light green). 6 sites have over 40% overlap with Flood Zone 3 (red), including 3 sites at Alton with over 80% overlap. A further 10 sites have between 1% and 20% overlap with Flood Zone 3 (amber).

Climate change mitigation

No data is available to enable GIS analysis of the site options. Whilst some site options may well have greater potential to incorporate on-site low carbon and renewable energy technologies (including on account of the scale and density of development or the terrain and aspect of the site), or link to a decentralised source of low carbon / renewable energy, there is insufficient evidence to enable robust analysis.

Community and wellbeing

Three GIS datasets ('layers') for the District as a whole are available to enable analysis of the site options. Specifically, the available data enables the site options to be analysed in respect of distance to the nearest Town, District or Local Centre; distance to nearest school and distance to nearest doctor's facilities.

Table A (see below) presents summary findings of the analysis, categorising the performance of sites on a red/amber/green scale reflecting the spread of the data. The following bullet points give further consideration to the findings presented in Table A.

- Average distance to the nearest town or local centre = 2,267m, with 27 sites within 400m (dark green) and a further 36 sites between 400m and 800m (light green). 143 sites are over 1.5km from a town or local centre (red) with a further 64 sites are between 800m and 1.5km (amber).
- Average distance to the nearest school = 974m, with 28 sites within 200m (dark green) and a further 46 sites between 200m and 400m (light green). 137 sites are over 800m from a school (red) and a further 59 sites are between 400m and 800m (amber).
- Average distance to the nearest doctor's surgery or similar facility = 1,548m, with 37 sites within 400m (dark green) and a further 44 sites within 800m (light green). 79 sites are over 2km from a doctor's surgery (red) and a further 110 sites are between 800m and 2km (amber).

Economy and employment

Although data is available on existing employment allocations and town and local centres, this represents just a part of the overall employment picture. It was not possible to conduct comprehensive GIS distance analysis on all current and allocated employment sites in the District or those sites in neighbouring Districts which provide employment to residents of East Hampshire.

Heritage

Several GIS layers for the District as a whole are available to enable analysis of the site options. Specifically, the available data enables the site options to be analysed in respect of: distance to nearest Listed Building; distance to nearest Scheduled Monument; distance to nearest Conservation Area; and distance to nearest Registered Park and Garden.

Table A (see below) presents summary findings of the analysis, categorising the performance of sites on a red/amber/green scale reflecting the spread of the data. The following bullet points give further consideration to the summary findings presented in Table A:

- Average distance to the nearest listed building = 450m, with 40 sites beyond 1km (dark green) and a further 121 sites between 200m and 1km (light green). 40 sites are within 50m of a listed building (red) and 69 sites are between 50m and 200m (amber).
- Average distance to a scheduled monument = 1,892m, with 195 sites beyond 1km (dark green) and a further 41 sites between 500m and 1km (light green). 14 sites are within 100m of a scheduled monument (red) and a further 21 sites are between 100m and 500m (amber).
- Average distance to a conservation area = 1,252m with 121 sites beyond 1km (dark green) and a further 91 sites between 100m and 1km (light green). 44 sites are within 50m of a conservation area (red) and a further 8 sites are between 50m and 100m (amber).
- Average distance to a registered park and garden = 3,566m with 206 sites over 2km (dark green) and a further 48 sites between 500m and 2km (light green). 2 sites are within 100m of a registered park and garden (red) and a further 14 sites are between 100m and 500m (amber).

Housing

No data is available to enable GIS analysis of the site options. It would not always be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, can be higher at large sites).

Landscape and townscape

One dataset is available to enable GIS analysis of the site options, specifically in respect of distance to the nearest point of the South Downs National Park (SDNP). Whilst the extent of the setting of the SDNP will naturally vary by context, including in relation to factors such as topography and tree cover, it is reasonable to make an assumption that in general the setting is likely to be strongest in closest proximity to the boundary and weakens as distance from the boundary becomes greater. There is a need to ensure that new development does not harm the SDNP or its setting.

Table A (see below) presents summary findings of the analysis, categorising the performance of sites on a red/amber/green scale reflecting the spread of the data. The following bullet point give further consideration to the summary findings presented in Table A:

Average distance to the nearest point of the SDNP = 1,208m, with 18 sites beyond 3km (dark green) and a further 101 between 1.2km and 3km (light green). 79 sites are within 250m of the SDNP boundary (red) and a further 77 sites are between 250m and 1.2km (amber).

Resources

The nationally available agricultural land quality map (see magic.gov.uk) is of a very low resolution and so not suited to the analysis of site options. The main point to note is that the nationally available map shows there to be very few areas of high quality Grade 2 land (and no Grade 1 at all) though areas of Grade 3 land can be found throughout the District. Of this Grade 3 land, the national dataset indicates that the North East area is most affected.

Water

No data is available to enable GIS analysis of the site options in terms of water quality. Whilst water pollution sensitivity may vary spatially (including relating to issues associated with the capacity of Waste Water Treatment Works), there is limited available mapped data. It is also the case that issues can often be appropriately addressed through masterplanning/ design measures, and so are appropriately considered at the planning application stage. The same can be said for drainage issues.

In terms of water resource availability, this does not vary significantly within the District, and hence need not be a consideration here. It is also not possible to appraise site options in terms of the potential to support water efficiency. Whilst it might be suggested that larger development schemes might be more able to deliver higher standards of sustainable design (including water efficiency measures) this assumption will not always hold true.

Finally, it is unnecessary to appraise site options in terms of groundwater 'source protection zones' and 'primary aquifers'. The presence of a groundwater source protection zone or aquifer does not represent a major constraint for most (non-polluting) types of development.

Table A: Summary findings of the GIS analysis

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
AL- 001	208-212 London Road, Holybourne	Alton													
AL- 002	Blanes Farm, Gilbert White Way, Alton	Alton													
AL- 003	St John's Works, Station Road, Alton	Alton													
AL- 004	Cowdray Park, Alton	Alton													
AL- 005	Land at Brick Kiln Lane and Basingstoke Road, Alton	Alton													
AL- 006	Land at Lord Mayor Treloar Hospital, Alton	Alton													
AL- 007	Land at Howards Lane, Holybourne	Alton													
AL- 008	Small Site - Howards Lane, Holybourne	Alton													
AL- 009	Land at London Road, Holybourne	Alton													
AL- 010	Site 3 - Land at London Road, Holybourne	Alton													
AL- 011	Site 2 - Land at London Road, Holybourne	Alton													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
AL- 012	Site 1 - Land at London Road, Holybourne	Alton													
AL- 013	Land at Weysprings, Alton	Alton													
AL- 014	Land at Weysprings Park, Windmill Lane, Alton	Alton													
AL- 015	Former Coors Brewery, Alton	Alton													
AL- 016	Land at Lynch Hill, Alton	Alton													
AL- 017	Land at Neatham Manor Farm, Alton	Alton													
AL- 018	Land east of Old Odiham Road, Alton	Alton													
AL- 019	Windmill House, Windmill Lane, Alton	Alton													
AL- 020	Lindsey's Field (N), south of Water Lane	Alton													
AL- 021	Lindsey's Field (S), south of Water Lane, Alton	Alton													
AL- 022	Land east of Selborne Road, Alton	Alton													
AL- 023	21 Winchester Road, Alton	Alton													
AL- 024	Stonehill Farm, Selborne Road, Alton	Alton													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
AL- 025	Lord Mayor Treloar School	Alton													
AL- 026	Wilsom Road, Alton	Alton													
BEE- 001	Snode Hill House, Beech	Beech													
BEE- 002	Highwood, 35 Snode Hill, Beech	Beech													
BEE- 003	Land rear of 76 Wellhouse Road, Beech	Beech													
BEE- 004	Beech Copse, Beech	Beech													
BEE- 005	Land south of Kings Hill, Beech	Beech													
BEE- 006	Thedden Grange, Beech	Beech													
BEE- 007	Thedden Farm, Beech	Beech													
BEE- 008	Land adjoining Medstead Road, Beech	Beech													
BEE- 009	Land at Spring Stables, Beech	Beech													
BEN- 001	Land north of Bay Tree Cottage, south of Greenfield Cottages	Bentley													
BEN- 002	Land at Hole Lane, Bentley, Farnham	Bentley													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	ISSS	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
BEN- 003	Land east of Hole Lane, Bentley	Bentley													
BEN- 004	Land west of Hole Lane, Bentley	Bentley													
BEN- 005	Land west of Rectory Lane, Bentley	Bentley													
BEN- 006	Land east of Rectory Lane, Bentley	Bentley													
BEN- 007	Northbrook Park	Bentley													
BEN- 008	Land north of A31 at Marelands, Bentley	Bentley													
BEN- 009	Ashfield, Hole Lane, Bentley	Bentley													
BEN- 010	Land south of 2 Barley Fields, Bentley	Bentley													
BEN- 011	Land west of Station Road, Bentley	Bentley													
BEN- 012	Land west of Talgarth, Main Road, Bentley	Bentley													
BEN- 013	Land at Hole Lane, Bentley	Bentley													
BEN- 014	The Paddocks, Station Road, Bentley	Bentley													
BIN- 001	Holt Pound House, Holt Pound Lane, Farnham	Binsted													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
BIN- 002	Old Kiln Farm, Farnham Road, Holt Pound	Binsted													
BIN- 003	Pin Shan, Fullers Road, Rowledge	Binsted													
BIN- 004	Binsted Mede, Isington Road, Binsted	Binsted													
BIN- 005	Land north of Fullers Road, Holt Pound, Rowledge	Binsted													
BIN- 006	Land adjacent to Linden, Fullers Road	Binsted													
BIN- 007	Land west of Farnham Road, Bordon	Binsted													
BTW- 001	Top Field land adjacent to Glebe Fields, Bentworth	Bentworth													
BTW- 002	Land at the corner of Church Street and Ashley Road, Bentworth	Bentworth													
BTW- 003	The Homestead, Bentworth	Bentworth													
BTW- 004	Crossways, Trinity Road, Bentworth	Bentworth													
CHA- 001	Land off Winchester Road, Alton	Chawton													
CHA- 002	Land adjoining Northfield Lane, Alton	Chawton													
CHA- 003	Land to the north of Wolf's Lane, Chawton	Chawton													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
CHA- 004	Land at Chawton Park Farm, Site 1, Alton	Chawton													
CHA- 005	Land at Chawton Park Farm, Alton	Chawton													
CHA- 006	Land at Chawton Park - Employment	Chawton													
CHA- 007	Land south west of The Triangle	Chawton													
CL- 001	Land south of Chalton Lane, Clanfield	Clanfield													
CL- 002	Clanfield County Farms, Clanfield	Clanfield													
FM- 001	Land at Headmore Farm, Four Marks Golf Club	Four Marks													
FM- 002	Land rear of 41 to 43a Blackberry Lane, Four Marks	Four Marks													
FM- 003	The Paddock, south of Brislands Lane, Four Marks	Four Marks													
FM-	Land adjacent to 98 Telegraph Lane,	Four													
004	Four Marks	Marks													
FM- 005	Land west of Telegraph Lane and south of Alton Lane, Four Marks	Four Marks													
FM- 006	Land at Lymington Bottom, Four Marks	Four Marks													
FM- 007	Land at Uplands Lane, Four Marks	Four Marks													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
FM- 008	32 Telegraph Lane, Four Marks	Four Marks													
FM- 009	The Pines, The Shrave, Four Marks	Four Marks													
FM- 010	Janeland, Willis Lane, Four Marks	Four Marks													
FM- 011	Land rear of 7-15 and 23-33 Blackberry Lane	Four Marks													
FM- 012	Land at Alton Lane, Four Marks	Four Marks													
FM- 013	Land south of Winchester Road, Four Marks	Four Marks													
FM- 014	Little Kitfield, Gradwell Lane, Four Marks	Four Marks													
FM- 015	Land rear of 97-103 Blackberry Lane, Four Marks	Four Marks													
FM- 016	Land at 131 Winchester Road, Four Marks	Four Marks													
FM- 017	Woodland at The Shrave, Four Marks	Four Marks													
FM- 018	Ranch Industrial Estate, Willis Lane, Four Marks	Four Marks													
FM- 019	Reynards Retreat, Willis Lane, Four Marks	Four Marks													
FM- 020	Land east of Brislands Lane and north of Gradwell Lane, Four Marks	Four Marks													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
FM- 021	Land south of Gradwell Lane and west of Kitwood Road, Four Marks	Four Marks													
FM- 022	Fordlands	Four Marks													
FM- 023	Briars Lodge, Willis Lane, Four Marks	Four Marks													
FM- 024	Land between Teazles and Coombe Dell, Alton Lane, Four Marks	Four Marks													
FRY- 001	Land at Upper Froyle	Froyle													
FRY- 002	Land at Lower Froyle	Froyle													
GRY- 001	Stoney Bottom, Grayshott, GU	Grayshott													
GRY- 002	Bede Cottage, Headley Road, Grayshott	Grayshott													
GRY- 003	Pinewood Lodge, Headley Road, Grayshott	Grayshott													
GRY- 004	Land north of Applegarth Farm, Grayshott	Grayshott													
GRY- 005	Stables at Bowleswood Farm, Grayshott Road	Grayshott													
HD- 001	Land rear of 191-211 Lovedean Lane, Horndean	Horndean													
HD- 002	Parsonage Farm, Catherington Lane	Horndean													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	ISSS	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
HD- 003	Swan's View, New Road, Lovedean, Hampshire,	Horndean													
HD- 004	Land south of Five Heads Road, Horndean	Horndean													
HD- 005	Land east of Five Heads Road, Horndean	Horndean													
HD- 006	Ashwood Stables, Lovedean	Horndean													
HD- 007	Field east of Four WInds, Catherington	Horndean													
HD- 008	Land north of Chalk Hill Road, Horndean	Horndean													
HD- 009	White Dirt Farm, Horndean	Horndean													
HD- 010	Land south and east of Blendworth Lane	Horndean													
HD- 011	Land south and southeast of Ham Lane, Horndean	Horndean													
HD- 012	Hazleton Farm, Horndean	Horndean													
HD- 013	Land at Lovedean Lane (West)	Horndean													
HD- 014	Land at Lovedean Lane (East)	Horndean													
HD- 015	Land at Coldhill Copse, Lovedean Lane	Horndean													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	ISSS	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
HD- 016	Land at Blendworth Lane, Horndean	Horndean													
HD- 017	Land north of 102 Downhouse Road, Catherington	Horndean													
HD- 018	Land north of Crouch Lane, Horndean	Horndean													
HD- 019	Land at Cottage Farm, north of James Copse Close	Horndean													
HD- 020	Land south of Coldhill Lane, Horndean	Horndean													
HD- 021	Land at Cottage Farm, Lovedean Lane, Horndean	Horndean													
HD- 022	187 Catherington Lane, Horndean	Horndean													
HD- 023	Land east of Horndean	Horndean													
HD- 024	Woodcroft Farm, Horndean	Horndean													
HEA- 001	Onahill, Arford Common, Headley	Headley													
HEA- 002	Land south of Headley Road, Headley	Headley													
HEA- 003	Archers, Church Lane	Headley													
HEA- 004	Land at Headley Nurseries, Glayshers Hill, Headley	Headley													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
HEA- 005	Land adjacent to Hatch House Farm, Headley Road, Lindford	Headley													
HEA- 006	Leighswood Cottage, Headley Fields, Headley, GU35 8PT	Headley													
HEA- 007	Grove Cottage, Picketts Hill, Headley	Headley													
HEA- 008	Baigents Copse, Picketts Hill, Headley	Headley													
HEA- 009	Sandhill Farm, Picketts Hill, Bordon	Headley													
HEA- 010	Land adjoining Hearn Vale, Headley	Headley													
HEA- 011	Land at Middle Common, Grayshott Road, Headley Down	Headley													
HEA- 012	Former Whiteleys Restaurant, Headley	Headley													
HEA- 013	Land at Beech Hill Road, Headley, Bordon	Headley													
HEA- 014	Land south west of May Close, Headley	Headley													
HEA- 015	Northern parcel land at Chenies	Headley													
HEA- 016	Northern parcel land at Westwood	Headley													
HEA- 017	Land south east of Mill Lane, Headley	Headley													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
HEA- 018	Land off Hollywater and Whitehill Road, Whitehill	Headley													
HEA- 019	Land adjacent to 25 Hillside Crescent, Headley Down	Headley													
HEA- 020	Picketts Hill, Sleaford	Headley													
KIN- 001	The Willows, Forge Road, Kingsley	Kingsley													
KIN- 002	Rear of Kingsley Tennis Centre, Forge Road, Kingsley	Kingsley													
KIN- 003	Forge Meadow, Forge Road, Kingsley	Kingsley													
KIN- 004	Land north of School Fields, Kingsley	Kingsley													
LAS- 001	Land south of Manor Farm Lane, Lasham	Lasham													
LAS- 002	Part of land north of Lasham Hill Lane, Lasham	Lasham													
LIN- 001	Paddock adjacent to B3002, Lindford Road	Lindford													
LIN- 002	Land to the east of Lindford Chase	Lindford													
LIP- 001	Holly Cottage, Bramshott	Liphook													
LIP- 002	Gorselands	Liphook													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	ISSS	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
LIP- 003	Aston Wood, Hill House Hill	Liphook													
LIP- 004	Land at Church Road, Bramshott	Liphook													
LIP- 005	Land north of Haslemere Road, Liphook	Liphook													
LIP- 006	Paddock at Little Boarhunt, Portsmouth Road, Liphook	Liphook													
LIP- 007	Westerfield, Weavers Down, Liphook, GU30 7PE	Liphook													
LIP- 008	Land adjacent to Billerica, Church Road, Bramshott	Liphook													
LIP- 009	Land off Bramshott Road	Liphook													
LIP- 010	Land at High Hurlands House, Gentles Lane	Liphook													
LIP- 011	Land at Haslemere Road, Liphook	Liphook													
LIP- 012	Land west of Headley Road, Liphook	Liphook													
LIP- 013	Land west of Church Lane, Bramshott	Liphook													
LIP- 014	Land at Penally Farm, Liphook	Liphook													
LIP- 015	Five Oaks, Queens Road, Liphook	Liphook													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
LIP- 016	Orange Lodge, 105 Midhurst Road, Liphook	Liphook													
LIP- 017	Chiltley Farm, Liphook	Liphook													
LIP- 018	Land rear of 9-11 London Road, Liphook	Liphook													
LIP- 019	Land at Old Shepherds Farm, Liphook	Liphook													
LIP- 020	Land at Devils Lane, Liphook	Liphook													
LIP- 021	Land north of Highfield Lane, Liphook	Liphook													
LIP- 022	Land west of Haslemere Road, Liphook	Liphook													
LIP- 023	Land east of Devils Lane, Liphook	Liphook													
LIP- 024	Land adjacent to Passfield Mill Business Centre, Passfield	Liphook													
LIP- 025	Millcott Meadow, Mill Lane, Passfield	Liphook													
LIP- 026	Thornhill Fields, Lynchborough Road, Passfield	Liphook													
LIP- 027	Passfield former Sewage Works	Liphook													
LIP- 028	Smaller site - Passfield Mill Industrial Estate	Liphook													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
LIP- 029	Land north of Liphook Services, Liphook	Liphook													
LIP- 030	Land south of Liphook Services	Liphook													
LIP- 031	Eagel Place, Longmoor Road, Lihook	Liphook													
LIP- 032	Hilltop Stabes, Devils Lane, Liphook	Liphook													
LIP- 033	The Laurels, Longmoor Road, Liphook	Liphook													
LIP- 034	Land east of Queens Road, Liphook	Liphook													
LIP- 035	Land adj. Heathcroft, Queens Road, Liphook	Liphook													
LIP- 036	Greengate, off Longmoor Road, Liphook	Liphook													
MED- 001	Land at The Haven, Merrow Down and Dinas	Medstead													
MED- 002	Beveley Farm, Five Ash Road, Medstead	Medstead													
MED- 003	Paddock View, Stoney Lane, Medstead	Medstead													
MED- 004	Land rear of Woodview Place and Timbers, Boyneswood Road, Medstead	Medstead													
MED- 005	Land at Penilee, Boyneswood Lane, Medstead	Medstead													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	ISSS	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
MED- 006	Land rear of Roscommon, Medstead	Medstead													
MED- 007	Woodlea Farm, Station Approach, Medstead	Medstead													
MED- 008	Land adjacent to Ashley House, Red Hill, Medstead	Medstead													
MED- 009	Land at Five Ash Crossroads, Four Marks	Medstead													
MED- 010	The Meadows, Soldridge Road, Medstead	Medstead													
MED- 011	Land rear of Junipers, South Town Road, Medstead	Medstead													
MED- 012	Site C, Land off Boyneswood Road, Medstead	Medstead													
MED- 013	Site B, Land off Boyneswood Road, Medstead	Medstead													
MED- 014	Land at Common Hill, Medstead	Medstead													
MED- 015	Land at Homestead Road, Medstead	Medstead													
MED- 016	Land at Lymington Bottom Road, Medstead	Medstead													
MED- 017	Little Pastures, Roedowns Road, Medstead	Medstead													
MED- 018	Land north of Wield Road, Medstead	Medstead													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	ISSS	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
MED- 019	Land at Paice Lane, Medstead	Medstead													
MED- 020	Southview, Abbey Road, Medstead	Medstead													
MED- 021	Land north of Cedar Stables, Medstead	Medstead													
MED- 022	Land west of Lymington Barn, Lymington Bottom Road	Medstead													
MED- 023	Land west of Roe Downs Farm, Medstead	Medstead													
MED- 024	Land west of Roe Downs Road, Medstead	Medstead													
RC- 001	Land at Oaklands House, Rowlands Castle	Rowlands Castle													
RC- 002	Land north of Bartons Road	Rowlands Castle													
RC- 003	Mays Coppice Farm, Rowlands Castle	Rowlands Castle													
RC- 004	Land south of Little Leigh Farm, Prospect Lane, Havant	Rowlands Castle													
RC- 005	Land south east of The Drift, Rowlands Castle	Rowlands Castle													
RC- 006	Land at Deerleap (north), Rowlands Castle	Rowlands Castle													
RC- 007	Land at Deerleap (south), Rowlands Castle	Rowlands Castle													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
RC- 008	Land at Manor Lodge Road, Rowlands Castle	Rowlands Castle													
RC- 009	Hazleton Farm South, Horndean	Rowlands Castle													
RC- 010	Land rear of Mays Coppice Farm, Rowlands Castle	Rowlands Castle													
ROP- 001	Startergate Farm, Monkwood	Ropley													
ROP- 002	Aurea Norma and Builders Yard, Ropley Dean	Ropley													
ROP- 003	Winton Cottage, Hammonds Lane, Ropley	Ropley													
ROP- 004	Land at Gilbert Street, Ropley	Ropley													
ROP- 005	Land east of Dunsell's Lane, Ropley	Ropley													
ROP- 006	Land at Home Farm, Ropley	Ropley													
ROP- 007	Land at Ropley	Ropley													
ROP- 008	Land to the west of Hammonds Lane, Ropley	Ropley													
ROP- 009	Land at Hammonds Lane, Ropley	Ropley													
ROP- 010	Land at Five Acres, Ropley	Ropley													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
ROP- 011	Land south east of Church Lane, Ropley	Ropley													
ROP- 012	Land east and south side off Petersfield Road, Ropley	Ropley													
ROP- 013	The Bungalow, off Winchester Road, Ropley	Ropley													
ROP- 014	Land off Winchester Road, Ropley	Ropley													
ROP- 015	Land south of Gravel Lane, Ropley	Ropley													
ROP- 016	Land between Barn Lane and A31, Ropley	Ropley													
ROP- 017	Land west of Winchester Road, Ropley	Ropley													
ROP- 018	Land west of Horse Lane, Ropley	Ropley													
ROP- 019	Land to the east of Longwood House, Ropley	Ropley													
ROP- 020	Land beside Bullfinches, Ropley	Ropley													
ROP- 021	Land west of Highgate House, Hawkley, GU33 6JS	Ropley													
SEL- 001	Land at Oakhanger Farm Business Park	Selborne													
SEL- 002	Land opposite The Red Lion, Oakhanger	Selborne													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
SEL- 003	Land at Lions Field, Oakhanger	Selborne													
SEL- 004	Land at Eveley Cotner, Firgrove Road, Whitehill	Selborne													
SEL- 005	Sidewater Stables, Oakhanger, GU35 9JS	Selborne													
WHI- 001	Land south of Walldown Road, Whitehill	Whitehill													
WHI- 002	Land at Watermeadow Farm, Lindford, Bordon	Whitehill													
WHI- 003	Land rear of The Royal Oak, Hollywater	Whitehill													
WHI- 004	Former Garrison Church, Bordon	Whitehill													
WHI- 005	Mill Chase Academy and Leisure Centre, Whitehill Bordon	Whitehill													
WHI- 006	Enterprise Zone (increased employment)	Whitehill													
WHI- 007	Oxney Farm SANG	Whitehill													
WHI- 008	BOSC Village	Whitehill													
WHI- 009	Annington Estate, Essex Close	Whitehill													
WHI- 010	Annington Estate, BOSC South	Whitehill													

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	ISSS	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
WHI- 011	Annington Estate, BOSC North	Whitehill													
WHI- 012	SLAB SANG, Oakhanger Road	Whitehill													
WHI- 013	The Croft, Hogmoor Road	Whitehill													
WHI- 014	Sacred Heart Church and nursery, High Street	Whitehill													
WHI- 015	Building 84,	Whitehill													
WHI- 016	Town Centre Phase 1	Whitehill													
WHI- 017	Town Centre Phase 2	Whitehill													
WIE- 001	Land at Berrywood Farm, Lower Wield	Wield													
WIE- 002	Church Farm, Upper Wield, Alresford	Wield													
WOR -001	Former Village Hall, West Worldham	Worldham													
WOR -002	Pylon Field, Alton	Worldham													
WOR -003	Land adjacent to Worldham Golf Club	Worldham													

Appendix V: Alternatives appraisal

Introduction

As explained within 'Part 1' above, a focus of work has been on the development and appraisal of spatial strategy alternatives, with a view to informing determination of the preferred strategy. Chapter 6 presents summary appraisal findings, whilst the aim of this appendix is to present detailed appraisal findings.

Appraisal methodology

Appraisal findings are presented below within 10 separate tables, with each table dealing with a specific sustainability topic (see Chapter 3). Within each table the performance of alternatives is categorised in terms of 'significant effects (using red / green) and also ranked in order of preference.

Every effort is made to predict effects / differentiate the alternatives accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects / differentiate accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a likely effect, this is made explicit in the appraisal text.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the plan in combination with other planned or on-going activity).

Biodiversity

	Option 1	Option 2	Option 3	Option 4
	High growth in the A31 Corridor	High growth in the North East	High growth in the Southern Parishes	High growth in the A31 Corridor and North East
Rank	2	3	1	4
Significant effects?	Yes	Yes	Yes	Yes

Discussion

A key consideration for all sites is the need to avoid impacts on the Wealden Heaths Phase II Special Protection Area (WH2SPA). The WH2SPA is made of four separate Sites of Special Scientific Interest and qualifies as an SPA for its breeding bird species. It is protected from adverse impacts from development under the Conservation of Habitats and Species Regulations. In practice, avoiding impacts on the distinct parcels of the WH2SPA means directing growth to less sensitive locations beyond the 400m and 5km buffers that have previously been established through the plan-making process in East Hampshire. Where development is proposed within the 5km buffer, the emerging local plan will need to ensure the delivery of sufficient Suitable Alternative Natural Greenspace (SANG), to mitigate the likely increased recreational pressure from new development.

The North East sub-area is the most constrained sub-area in relation to the WH2SPA, which is dispersed widely throughout, in close proximity to and between its key settlements. This has implications for Options 2 and 4 which focus growth at the North East, whilst Options 1 and 3 focus more growth at locations outside the 5km buffer, and in most cases significantly farther from these more sensitive areas. Much of the strategic growth in Option 2 will be focused at the former Louisburg Barracks at the north of Whitehill & Bordon and to the southeast of Liphook. This area is particularly sensitive in biodiversity terms as it is well within 5km of areas of WH2SPA to the north and to the south (with respect to Whitehill & Bordon) and to the north east and west (with respect to Liphook). Option 4 also involves additional development at Whitehill & Bordon and Headley

compared to Options 1 & 3, giving rise to the potential for greater impacts on the WH2SPA.

In practice, there is likely to be potential to avoid recreational impacts on the WH2SPA arising from new residential development, through the tandem development of new areas of SANG at Whitehill & Bordon and elsewhere. All of the Options include site options that have been promoted for new SANG in the Whitehill & Bordon area (WHI-007, WHI-012 and HEA-018); although the delivery of additional SANG at Liphook, to mitigate impacts arising from development in/around the village, is less certain. Furthermore, the availability of sufficient land to deliver off-site SANG to enable residential development on smaller sites (which could have cumulative effects) is also yet to be determined through the plan-making process. Taking these matters into account, together with the relative amounts of residential development in the North East sub-area for each option, Option 2 is the least favourable in terms of impacts on the WH2SPA, followed by Option 4 and then Options 1 & 2. However, all options have the potential for significant adverse effects on the WH2SPA, given the lack of certainty at this early stage in the plan-making process on the future provision of SANG.

There are, however, a number of additional SPA constraints to be taken into account. As well as the WH2SPA, sites within all of the options fall (partially) within one of the 5km/5.6km buffer zones for the Wealdon Heaths Phase I SPA, the Thames Basin Heath SPA or the Chichester and Langstone Harbours SPA. This has similar implications for proposed residential development at the affected sites, which have been identified as the Northbrook Park area of search that's centred on BEN-007; and the sites: RC-001, RC-002, RC-004, RC-006, RC-007 and RC-009 in the parish of Rowlands Castle. These additional SPA issues affect Option 4 in particular, but all options include sites in Rowlands Castle parish that fall within the Chichester and Langstone Harbours SPA. Taking account of all the SPA issues affecting development in the District, Option 4 has the potential to affect the greatest number and geographical spread of SPAs, with sites located in all of the buffer zones; but Option 2 focuses the greatest quantity of residential development within close proximity to these protected areas. It is also important to note that the Northbrook Park area of search is not particularly well-linked by roads to the Thames Basin Heaths SPA or the Wealdon Heaths Phase 1 SPA. Further information on the potential impacts will be available following progress on the Habitats Regulation Assessment for the emerging local plan, but at this early stage it is reasonable to confirm that Option 2 remains the least favourable option for SPA-related impacts, followed by Option 4 and then Options 1 & 3.

In addition to SPAs, there are a number of internationally designated Special Areas of Conservation (SACs) in East Hampshire. A number of sites that are promoted for residential development at Whitehill & Bordon (WHI-008, WHI-010, WHI-011 & WHI-013) are in close proximity (c.1km) to Shortheath Common SAC. Once again, this means that there are greater potential impacts for Options 2 & 4, which are the only options including all of the aforementioned site options.

Looking beyond international designations, there is a need to consider the impacts of growth on other sites of biodiversity significance such as Sites of Special Scientific Interest (SSSIs), ancient woodland, and Sites of Importance for Nature Conservation (SINCs). Many of the SSSIs in the planning area are also SPAs and/or SACs, but the areas of ancient woodland and SINCs are widely and relatively evenly distributed, meaning that at a high level, there is little to distinguish between the four options in terms of potential impacts on these features. However, there are a number of localised 'hotspots' which warrant further discussion.

Option 1 involves higher growth in the A31 sub-area and would involve allocation of a new settlement at Chawton Park Farm. As the strategic site is located between two extensive areas of ancient woodland which are also SINCs there is clear potential for negative impacts on biodiversity-supporting habitats. It may be possible to deliver some mitigation within the development, such as well marked footpaths and cycleways to divert users away from sensitive adjacent areas and additional areas of green infrastructure including new habitat linkages; but it is considered highly likely that development at Chawton Park Farm would lead to additional recreational pressure on sensitive habitats.

Options 2 and 4 involve the largest quantity of additional new homes at Whitehill & Bordon, a settlement that is set within an extensive network of SINCs that could be adversely affected by further substantial, cumulative development at north Whitehill & Bordon. Many of these SINCs are easily accessible from the Louisburg Barracks area. Indeed, a number of the site options form parts of the Oxney Farm Woodland, the Slab or The Croft SINCs. However, these areas are proposed exclusively or predominantly as areas of SANG, to avoid recreational impacts on the

WH2SPA and this could offer biodiversity benefits through ensuring more appropriate management regimes that could provide local biodiversity gains.

Options 1 and 4 include higher growth in the A31 corridor than Options 2 & 3, with the majority of the site options being greenfield land in edge-of/out-of-settlement locations. This corridor has been identified as an area of known importance for dormice (i.e. a protected species), so there is potential for these options to have greater impacts on dormice populations.

Option 3, which would involve higher growth in the Southern Parishes sub-area, would see further strategic expansion to the east of Horndean. This site option is close to a number of SINCs and to ancient woodland associated with Havant Thicket. This area is likely to experience major change over the plan period, with the development of Havant Thicket reservoir by Portsmouth Water. The reservoir is identified as an opportunity for the provision of new green infrastructure through the PUSH Green Infrastructure (GI) Strategy, and new strategic development at land east of Horndean (RC-009) presents an opportunity to implement a strategic approach to GI, which could bring benefits for local biodiversity by enabling the extension of habitats to form a coherent network. Taking a more precautionary approach however, new development on land east of Horndean has the potential to adversely affect the local habitats of the protected Bechstein's bat species.

Option 4 includes the area of search at Northbrook Park. The northern parts of this area include locally important habitats, namely blocks of ancient woodland and SINCs, whilst there are also SINCs and ancient woodland to the south and southwest of the area, associated with Alice Holt in the South Downs National Park. There is the potential for adverse impacts arising from increased recreational activity in these areas.

Considering all of the above issues and opportunities for biodiversity, Options 2 and 4 perform weakest in terms of potential impacts on SPAs, with Option 4 also having notable potential for combined impacts on protected species and other designated sites. Whilst the range of potential impacts are similar for Options 1 and 3, slightly less of the proposed growth would occur in areas that have recognised potential for impacts on SPAs in the case of Option 1. Although Land East of Horndean (Phase 2), which forms part of Option 1, is on the periphery of the 5.6km buffer zone for the Chichester and Langstone Harbour SPA; it would have very good road links to the Solent coastline by virtue of its proximity to the A3(M).

Against the SA objectives for Biodiversity, Option 4 is the weakest performing option, then Option 2, followed by Option 1 and then by Option 3. This entails that Option 3 is the highest ranking option in terms of the SA Framework topic: Biodiversity, followed by Option 1, Option 2 and finally Option 4.

For all options: in terms of the probability of adverse impacts, much will depend on the scope for avoidance and mitigation of the potential impacts on biodiversity and the inclusion of suitable measures to ensure this through new development. In particular, it's important to bear in mind that the strategic site options for each option could include significant areas of SANG and new green infrastructure. However, impacts are likely to be related to outdoor recreation associated with new residential development and could therefore be frequent and enduring. On a precautionary basis, significant adverse effects are identified.

Climate change adaptation

	Option 1	Option 2	Option 3	Option 4
	High growth in the A31 Corridor	High growth in the North East	High growth in the Southern Parishes	High growth in the A31 Corridor and North East
Rank	1	2	3	3
Significant effects?	Yes	Yes	Yes	Yes

Discussion As identified in the SA scoping report, a significant facet of climate change is changing rainfall patterns and the potential for associated increases in flood risk. A key climate change adaptation measure is therefore to ensure new development is directed away from areas of the highest flood

A key flood risk consideration at Options 1, 2 and 4 is the River Wey which flows through both the A31 Corridor and North East sub-areas. However, areas of fluvial flood risk associated with the Wey are not extensive and consequently affect only a small number of site variables. Significantly for Option 1, the new settlement option at Chawton Park Farm has no fluvial flood risk associated with it, and neither do the majority of larger sites within Option 1 such as FM-013 at Four Marks and ROP-010 at Ropley. However, the former Coors Brewery site, AL-015, is almost entirely within Flood Zone 3 and is a notable exception to Option 1's otherwise low level of fluvial flood risk. Option 2 includes a number of sites near to the Wey but outside areas of fluvial flood risk, whilst Option 3 is also unaffected by fluvial flood risk, as the site options in Clanfield, Rowlands Castle and Horndean are located away from major watercourses. Option 4 includes the Northbrook Park strategic new settlement area of search, the south of which is within Flood Zone 3 and is considered to be the weakest strategic site option in terms of fluvial flood risk. However, the southern parts of this site could be developed for non-residential land uses that are less vulnerable to flooding.

Additionally, the Council's Strategic Flood Risk Assessment identifies a number of areas of groundwater flood risk (i.e. at risk of flooding to surface). Groundwater flooding is more extensive across the District than fluvial and affects a greater number of sites within the Options. Although there is no probability associated with the areas of groundwater flood risk, a groundwater flood event can be very disruptive and can endure for months. At Options 3 and 4, groundwater flooding affects the strategic new settlement sites of Land East of Horndean and Northbrook Park respectively. Land East of Horndean is subject to groundwater flood risk across almost half its area whereas the area of risk at Northbrook Park is more concentrated towards the south and centre of the site, although it still affects a large part of the site. Groundwater flood risk in Option 1 is limited to just the mixed use site at the former brewery (AL-015), the residential site at the former Mill Chase Academy (WHI-005) and one site proposed for community facilities at the Treloar's Special Education School in Holybourne (AL-025). At Option 2, groundwater flood risk affects a number of residential sites southeast of Liphook. Based on this analysis, the largest number of new homes could potentially be affected by groundwater flood risks under Option 3, with fewer homes being potentially affected under Option 4, fewer still under Option 2 and the fewest under Option 1.

In addition to fluvial and groundwater flood risks, it is also important to consider surface water flood risks. Large areas of the site at Chiltley Farm, Liphook (LIP-017) are affected by surface water flood risks with a 1 in 1,000 year probability of occurring. This is a low probability of flooding, but is a useful indicator of where surface water flooding could occur due to extreme weather events, which are more likely to occur as a result of climate change. LIP-017 is a site option 'constant' for all Options. Only one other site option within the reasonable alternatives, Land at Deerleap (north) (RC-006), is affected by similar surface water flood risks to a great extent. This site forms part of Option 3. Therefore, in terms of surface water flood risk, Option 3 is affected in a more significant way than other Options; although it includes fewer new homes that would take access from Lovedean Lane,

which is affected by surface water flood risks.

The potential impacts of climate change extend beyond flood risk and include heat-related factors such as increased likelihood of longer and warmer heatwaves. The revised NPPF has greater focus on "the risk of overheating from rising temperatures" and this reflects a growing awareness of the role that Local Plans can play in adapting to potential future heat-health issues. From a spatial perspective this could include matters of location and layout, potentially including directing new development towards areas of greater natural shelter and providing sufficient capacity for multifunctional green infrastructure. In this context, Option 1 responds positively to the challenges of climate change as the strategic new settlement site at Chawton Park Farm lies within a sheltered and wooded valley, which could help reduce future heat island effects from new development and offer protection to new homes from more extreme weather events. Option 3, with the strategic new settlement site at Land East of Horndean, is potentially the weakest option in this regard as the strategic site option is relatively open, offering little natural shelter. However, it is considered that no site substantially outperforms any other in terms of heat-related climate change effects as the spatial characteristics of all sites are not considered likely to prevent suitable policy responses to climate change adaptation from coming forward.

In conclusion, all four Options generally direct development away from areas of high fluvial flood risk though there are notable site-specific exceptions in Option 1 and Option 4. The risk of groundwater flooding is more extensive and has a degree of effect at all Options, though is considered likely to have the most significant effect on Option 3 and Option 4. This is on the basis that strategic new settlement sites at these Options fall within areas of high groundwater flood risk. Overall, it is considered that Options 3 and 4 are the worst performing options in terms of climate change adaptation as their strategic site options are more substantially affected by areas of fluvial and groundwater flood risk (Option 4) or by groundwater and surface water flood risks (Option 3). Option 2 includes less new housing in areas affected by flood risks, but still includes sites in southeast Liphook that are at risk of flooding from groundwater sources. Option 1 is considered to perform most strongly on the basis that its strategic new settlement option is largely unencumbered by flood risk, and the overwhelming majority of smaller sites are similarly directed away from areas of high risk.

These findings are supported by, or remain unchanged in view of non-flood risk climate change adaptation factors. Although it is difficult to draw firm conclusions, a consideration of local topography and landscapes indicates that Option 1 would incorporate the highest degree of natural protection from a warming climate.

Significant positive effects are identified on the basis that all options direct the majority of development to areas of lower flood risk.

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from: https://p

²⁸ House of Commons Environmental Audit Committee (2018), 'Heatwaves: Adapting to Climate Change' [online], available from: https://publications.parliament.uk/pa/cm201719/cmselect/cmenyaud/826/826.pdf

Climate change mitigation

	Option 1	Option 2	Option 3	Option 4
	High growth in the A31 Corridor	High growth in the North East	High growth in the Southern Parishes	High growth in the A31 Corridor and North East
Rank	2	1	4	3
Significant effects?	No	No	No	No

Discussion Option 2 performs strongly in some aspects of the SA climate change mitigation objectives of reducing greenhouse gas emissions through the use of sustainable transport and reducing the need to travel overall. The key positive aspects of Option 2 include the opportunity presented by strategic development at Whitehill & Bordon to deliver extensive green infrastructure, including as means of integrating development into the existing settlement. This could include pedestrian and cycle links both within the new development areas and to the services at the new town centre, potentially facilitating the use of sustainable transport and reducing the need to travel to other service centres. Option 2 also includes densified residential development at, and adjacent to, the new town centre itself which will become a highly sustainable location in terms of access to services and facilities. Looking beyond Whitehill & Bordon, Option 2 features development south of Liphook at sites which are within a mile of Liphook station and there could be potential to deliver improved cycle and pedestrian links with the station to maximise the potential benefits. The south of Liphook sites are also around one mile from services at the settlement centre, including a large supermarket and dayto-day services such as the library, bank and pubs and restaurants. However, a notable issue with Option 2 is that the settlement which is a focus for growth, Whitehill & Bordon, does not have a railway station and its links to larger centre and the wider Solent sub-region are therefore necessarily car-dependant.

> Option 4 performs more weakly than Option 2 because Northbrook Park would likely be car dependent for access to many services, despite the potential to deliver some local services within the site. It is recognised that Northbrook Park is relatively close to Bentley station and is linked by an existing cycle route, though walking is unlikely to be a practical option for station access. Regular bus services run along the A31 between Farnham and Alton and there could be potential to extend or alter existing routes to serve the Northbrook Park site directly. However, it is considered that the short journey to Farnham would continue to be tempting to make by car, and private vehicles would likely remain the primary means of accessing nearby service centres.

> Option 1 performs reasonably well against the SA objectives. As with the other new settlement options, Chawton Park Farm is of strategic scale and therefore offers potential to deliver some local services within the site itself, feasibly reducing the need to travel for some services. Notably, however, Chawton Park Farm is also sufficiently close to Alton that providing cycle routes into the town centre could be a viable sustainable transport option. The town centre services and facilities are around 2 miles from the site, with Alton station a further half a mile. It should also be possible to extend existing bus services, particularly services 38 and 64, to serve the Chawton Park Farm site. The non-strategic sites within Option 1 are mainly outside Alton, and are likely to have a greater degree of car dependency in terms of accessing higher tier service centres. However, in general the sites at Bentley, Four Marks and Ropley are in close proximity to the A31 and to regular bus services between Winchester and Alton.

> Option 3 produces a mixed performance in terms of climate change mitigation. The mainline train station at Rowlands Castle is a positive feature and gives Option 3 connectivity to Portsmouth and the wider Solent region, as well as onwards connectivity to London Waterloo. However, there is a degree of separation between Rowlands Castle as and the other parts of the Southern Parishes subarea and this means only a few sites are within walking and cycling distance of the station. Whilst there could be potential to enhance walking/cycling links between the Clanfield sites and existing local services at Drift Road/White Dirt Lane, it is considered likely that new development at Clanfield, as at Catherington and Lovedean, will be car dependant for key services as the settlements' respective local centres offer a limited range of facilities. The scale of the strategic allocation at Land

> East of Horndean – particularly in light of the potential to deliver the site coherently with the existing LPP2 allocation - offers an opportunity to deliver new local centre services and reduce need to travel for future residents at the site. There could also be potential to deliver extensive green infrastructure within the strategic site itself as well as walking and cycling links with the existing Horndean services.

Community and wellbeing

	Option 1	Option 2	Option 3	Option 4
	High growth in the A31 Corridor	High growth in the North East	High growth in the Southern Parishes	High growth in the A31 Corridor and North East
Rank	1	3	3	2
Significant effects?	No	No	No	No

Discussion All four options include significant residential development in edge-of-settlement or peripheral locations, with varying degrees of connectivity to existing services and facilities; but all options also involve the additional provision of community infrastructure to address the needs of new residents. No option would involve the development of large-scale built community facilities and services, such as a new leisure centre, supermarket or hospital; but this is to be expected given the scale of individual development sites that comprise each option. By contrast, all of the options could be supported by the development of significant new green infrastructure (e.g. open space, footpath/cycle linkages, new water bodies and features), which can have community and healthrelated benefits. Option 3 offers access to potentially the most significant single piece of new green infrastructure in the form of the forthcoming Havant Thicket Reservoir. The reservoir is proposed by Portsmouth Water primarily as an additional source of potable water supply and its primary function would be in this context. However, the reservoir would also provide an opportunity to deliver a substantial and varied leisure offer at the reservoir site, including both water-based and land-based recreational activities. Option 3 would focus growth in the south of the District, facilitating access to the proposed leisure and recreation facilities at the reservoir, particularly in the case of new housing that would be developed to the east of Horndean.

> All options would deliver two substantial areas of SANG at Whitehill & Bordon, both of which would enhance the opportunities for leisure and recreation for residents of the town itself, as well as surrounding smaller settlements and villages. It is likely that the new green infrastructure assets delivered through the strategic development at Whitehill & Bordon would also have health-related benefits, as it could position walking and cycling as viable and attractive options for travel to and from the new town centre. Habitat restoration projects of heathland areas in the Whitehill & Bordon area has also been identified as being of potential community value, by fostering a shared sense of ownership and promoting social cohesion; all options involve significant development in this area, which could help to fund such an initiative. Lastly with regard to all of the options, new development at Clanfield could facilitate the delivery of new allotments, to address a deficiency that's been identified through the Council's Open Space Study (2018).

> There are also some differences between the options for purposes of delivering new community infrastructure. For example, Option 4 would offer potential to deliver new green infrastructure links between the new settlement at Northbrook Park and the Alice Holt forest in the South Downs National Park, in addition to the potential to improve transport links to the town of Farnham in Surrey, which has many community facilities and services. This option could also facilitate the delivery of green infrastructure enhancements to the northern Wey Valley, which has been outlined as a potential GI project for the local plan, in the East Hampshire Green Infrastructure Strategy (draft). For Option 2, development to the southeast of Liphook could offer an opportunity to improve local cycle and pedestrian connections, particularly to the train station, thereby improving access to services and facilities elsewhere. However, there is potential for cumulative adverse effects on the local road network in the centre of Liphook, particularly in consideration of development to the southeast and the existing housing allocation at Lowsley Farm (LP1 in the Part 2 Local Plan).

Option 1 would deliver substantial growth to the west of Alton, making it well placed for the existing community facilities of Alton Sports Centre and Alton Community Hospital. Additionally, Option 1 would be ideally placed to access the recreational off-road cycle path which runs through Chawton Park Wood, between Alton and Four Marks. The long distance St Swithun's footpath is also within easy reach of the Chawton Park Farm strategic site, as well as a number of smaller sites at Ropley and Four Marks. However, the draft East Hampshire Green Infrastructure Strategy identifies "an existing deficiency in natural and semi-natural open space in the North West [A31 Corridor] subarea" which is "likely to be exacerbated to a small extent by planned growth". In this context it is therefore notable that few of the site options in the A31 corridor under Option 1 have been promoted to indicate that new natural and semi-natural open space would form a key part of development. Although a project to address this deficiency is identified within the draft GI strategy, the suggested scale of the project is beyond what could be accommodated at Chawton Park Farm (taking account of the need for land for other uses within the confines of the site). This option therefore has the potential to exacerbate existing deficiencies, subject to a more strategic approach to GI being adopted, involving development at Chawton Park Farm and woodland areas to the north and south.

New green infrastructure can deliver health-related benefits for all age groups, but one of the SA objectives under this topic specifically focuses on the needs of an ageing and growing population. All options include site options that have been promoted for land uses including for older persons accommodation (typically in Use Class C2). The peripheral nature of smaller sites across all options, being relatively distant from many local facilities and services, could mean that these sites are less suitable for older persons accommodation, for it could be more difficult for older, less mobile residents to access services and facilities and therefore to meet and socialise with other members of the local community. However, all options include larger, new settlement or settlement extension options that could better provide for the service and community needs of older persons through the co-location of housing and other uses.

In conclusion, all of the options have the capacity to support improvements to the provision of local community infrastructure, with notably improvements to green infrastructure being particularly apparent; whereas improvements to other community facilities (e.g. halls, local shops, sports facilities) are likely to be more modest, proportionate to the scale of new development and therefore localised. The potential for more significant improvements to green infrastructure as opposed to other forms reflects the largely rural nature of East Hampshire; the small size of its settlements and the relatively modest population and household growth (i.e. as a proportion of the existing resident population) overall during the plan period. These factors mean that there is less opportunity for the development of new built community infrastructure. However, a large growth in the older persons (+65 years old) population is projected by 2036 (a +48% increase is projected to occur, according to the ONS 2014-based population projections; see SA Scoping Report). This suggests a more pressing need for infrastructure focused on their requirements. Options that could deliver significant levels of green infrastructure, together with older persons accommodation in closest proximity to other, existing facilities and services are therefore the best performing options under this SA topic.

Taking the above into account, Option 1 appears to be the best performing option due to the combination of the potential for new green infrastructure in the A31 corridor at and at Whitehill & Bordon, together with the potential proximity of substantial additional mixed use development in a location that's accessible to facilities and services at Alton. Option 4 also performs well in terms of supporting new green infrastructure in the northern Wey Valley and in placing substantial amounts of new residential development close to emerging facilities and services at Whitehill & Bordon. Options 2 and 3 also have merits, especially with regard to the provision of new green infrastructure in the case of Option 3, which could facilitate the delivery of the Havant Thicket reservoir and associated recreational facilities. However, by placing less residential development in closest proximity to the larger service centres, Option 3 perform less well against the relevant SA objectives. It is also important to note that Option 2 does not provide any strategic green infrastructure benefits in the A31 corridor, despite the opportunities that exist in this area and the deficiencies noted in the draft Green Infrastructure Strategy.

Option 1 is therefore the highest ranking option in terms of this SA topic, followed by Option 4 and then by Options 2 & 3. Options 2 & 3 are ranked equally because they cannot be easily distinguished from one another, due to the fact that they perform less well than the other options in terms of different aspects of the SA objectives (supporting the needs of an ageing and growing population in the case of Option 3; and improving access to green infrastructure in the case of Option 2).

Economy and employment

	Option 1	Option 2	Option 3	Option 4
	High growth in the A31 Corridor	High growth in the North East	High growth in the Southern Parishes	High growth in the A31 Corridor and North East
Rank	1	1	3	2
Significant effects?	Yes	Yes	Yes	Yes

Discussion Employment site options feature amongst a number of the site 'constants' which are included in all of the reasonable alternatives for the spatial strategy, with few additional employment-only options included amongst the variables. Although this offers little to distinguish between the Options, it is notable that Options 1 and 4 have the potential to contribute substantial additional employment land in the strategically advantageous A31 corridor, close to Alton and Farnham respectively. The strategic new settlement sites (Chawton Park Farm, Land East of Horndean Phase 2, Northbrook Park) are also expected to incorporate an element of new employment floorspace, which would further augment the provision of new facilities to address local requirements under Options 1, 3 and

> Although the Council's Housing & Economic Development Needs Assessment suggests that the quantitative needs for new employment facilities are relatively small, it also identifies qualitative issues that count in favour of greater provision. The range of sites that would be provided by an option - in terms of site location, size and business sector suitability - is therefore likely to be more important than the overall quantum of floorspace. It is therefore notable that in terms of providing new facilities in a range of locations, Options 2 and 3 are likely to perform well by providing opportunities for employment floorspace development in all three sub-areas (Option 3) or by providing opportunities in both rural and urban locations (Option 2). The provision of employment floorspace in rural environs could also enable Option 2 to address a more diverse business base. Option 1 is also likely to perform well due to the variety of sites provided in Alton - the settlement with the largest existing employment areas - which could offer a range of opportunities for both small and medium-sized businesses in a popular location.

> In addition to ensuring that a range of employment sites would be made available, the SA objectives prioritise enhanced access to existing sites and training opportunities. In this context, Options 2 and 4 perform well because they include the largest quantum of new housing within Whitehill & Bordon, in relatively close proximity to the Future Skills Centre and the Business and Enterprise Centre that form part of the area's regeneration, as well as to the proposed new employment allocations. It is also noteworthy that the new employment allocations in Option 1 are all within reasonable cycling distance of Alton train station, are located on two regular bus routes and are close to a junction of the A31. Finally, Option 3 would include new employment floorspace and a greater number of new homes in the Solent sub-region, in closer proximity to job and training opportunities in Portsmouth and its environs. Taking all of this into account, all options have the potential to perform well against the SA objective of improving accessibility to local employment and training opportunities. There is little to differentiate the options in this respect, however in the context of seeking to provide local job and training opportunities, it appears that Option 3 performs slightly less well than the others.

> In conclusion, Options 1 and 2 are considered to perform most strongly, as they feature specific employment site allocations that are likely to meet a range of employment needs, whilst also improving accessibility to local jobs and training opportunities. Option 4 performs relatively well in these respects, with Option 3 being the weakest of the four options because although it would offer the greatest geographical distribution of new employment site options, new housing in the Solent sub-region may continue to support out-commuting from the District for work purposes (e.g. due to the proximity of Portsmouth).

> Options 1 and 2 are therefore the highest ranking options in terms of this SA topic, followed by Option 4 and then by Option 3. Employment site options feature amongst a number of the site 'constants' which are included in all of the reasonable alternatives for the spatial strategy, with few

additional employment-only options included amongst the variables. Although this offers little to distinguish between the Options, it is notable that Options 1 and 4 have the potential to contribute substantial additional employment land in the strategically advantageous A31 corridor, close to Alton and Farnham respectively. The strategic new settlement sites (Chawton Park Farm, Land East of Horndean Phase 2, Northbrook Park) are also expected to incorporate an element of new employment floorspace, which would further augment the provision of new facilities to address local requirements under Options 1, 3 and 4.

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Options 1 and 2 are therefore the highest ranking options in terms of this SA topic, followed by Option 4 and then by Option 3. Long-term positive effects are likely, as new housing would be developed in close proximity to emerging employment facilities and training opportunities at Whitehill & Bordon for all options.

Heritage

	Option 1 High growth in the A31 Corridor	Option 2 High growth in the North East	Option 3 High growth in the Southern Parishes	Option 4 High growth in the A31 Corridor and North East
Rank	1	1	1	1
Significant effects?	Yes	Yes	Yes	Yes

Discussion In a broad sense, Option 1 would likely have limited direct effects on built heritage as the strategic new settlement site is located in a rural setting which is well screened from the surrounding areas, including the sensitive historic centre of nearby Chawton village. However, there is a single Grade II listed building on site, Chawton Park Farmhouse, and there would likely be direct effects upon its setting and character through Option 1. Due to the sensitive nature of the listed building's setting and intrinsic character, development at Chawton Park Farm (CHA-005) is therefore constrained by designated heritage issues. However, Option 1 is also the only option which directs development away from Will Hall Farm by omitting site AL-005. This is notable as the open rural setting of the historic oast house, farm house and barn on the site makes an important contribution to their historic value. Preserving this rural context via Option 1 will be positive in heritage terms. The limited impacts mean that Option 1 performs fairly well in terms of avoiding harm to the District's heritage assets although this also means that it is unlikely to have positive effects in terms of enhancing their significance, or accessibility. In terms of the potential for indirect impacts on designated assets, it is noteworthy that vehicle journeys from Chawton Park to the centre of Alton could pass through The Butts Conservation Area, such that additional traffic could have an impact on its historic character.

> Option 2 has a different heritage context as development is focussed at sites which are all within or adjacent to existing settlements. This gives rise to potential effects on the historic character of those settlements where relevant. At Whitehill & Bordon none of the site options appear likely to directly impact a designated heritage asset, partly as a result of there being few such assets in the town and partly because development is focussed on greenfield or recently cleared sites. However, the town's long association with the military has a degree of influence over its broader identity and character and there could be opportunities to reflect the town's military heritage within new development.

> Option 2 sites in other settlements also have a limited direct impact on designated heritage assets, although development could lead to indirect effects. Development of the sites to the southeast of Liphook would have a transformational effect on this area and could have adverse effects on the rural context for two listed buildings on Chiltley Lane. Substantial development in Liphook would also be likely to generate additional traffic flows through the historic town centre conservation area. By contrast, site options at Headley have little effect on the character of the town in heritage terms and have no direct or indirect implications for heritage features. In terms of promoting access to heritage assets, Option 2's allocation of strategic SANG to the east of the town could help to facilitate access to and appreciation of the unusual and extensive River Wey Conservation Area which would be immediately adjacent to the east. Option 2 therefore performs well against the SA objectives as it combines limited direct harm with the potential for enhancing existing heritage assets or historic settlement character.

> Option 4 performs less well than Option 2 as the Northbrook Park area of search features a cluster of prominent listed buildings associated with the wedding venue and hotel in the former stately home and country estate on the site. The current undeveloped setting of the listed buildings contributes to their overall historic character and it can be expected that urbanisation of the area would likely affect this setting. However, because a broad area of search is under consideration for this Option, the site for a new settlement could be defined to provide a lower density of new development in close proximity to the main cluster of listed buildings. Other site options in Option 4 generally have limited direct impacts on designated heritage assets, although this option includes the site at Brick Kiln Lane that adjoins Will Hall Farm (AL-005) and could therefore have impacts on the rural setting of these listed buildings.

At Option 3, it is necessary to consider the effects of development on the conservation area at Rowlands Castle as well as on the historic core of Clanfield which boasts a number of listed buildings despite the absence of a declared conservation area. Site RC-006 at Rowlands Castle is the only variable site within any of options which is entirely within a conservation area and the site is also adjacent to The Castle Scheduled Ancient Monument. The Stansted Park Registered Park and Garden is just to the east although this is considered less likely to be directly affected by development at RC-006. The site itself is well screened from the historic village core and development could potentially maximise the opportunity this screening provides, to mitigate likely visual impact. Despite this, it will be important that development is sensitively designed in a manner which respects and potentially enhances its historic setting and the local character.

At Clanfield, the settlement's historic core is interspersed with modern and mid-20th century buildings which weakens a coherent sense of historic identity and creates a more sporadic historic fabric than at Rowlands Castle. Nevertheless, there are a number of attractive and characterful listed buildings in the old part of Clanfield which, along with the nucleated settlement pattern, create a localised historic character, despite the presence of far more extensive modern development just to the east. This can be strongly attributed to the physical gap between the new development near the A3 and the historic core to the west, and it is therefore significant that Option 3 includes site CL-001 which will occupy this gap. There are implications for Clanfield's historic character as development within this gap could result in the loss of the settlement's open and rural setting which makes a significant contribution to this character. Option 3's strategic site option at Land East of Horndean is considered unlikely to have direct effects on designated heritage sites through the development process itself, although it could potentially generate additional vehicle movements through the historic core of Rowlands Castle, for purposes of accessing the railway station.

Overall, it is noteworthy that all options have potential for some adverse effects on the setting or intrinsic value of the District's designated heritage assets, and in the case of Options 1, 2 and 3, for indirect effects on historic areas due to increased traffic levels. It should be noted that all of the listed buildings implicated in the above appraisal are Grade II, making differentiation of the options more difficult. Nonetheless, it appears that Option 4 could potentially have greater adverse effects on listed buildings than other options, because there are a larger number of these assets at Northbrook Park that could be substantially affected by the development of a new settlement. However, because this new settlement option is identified as an area of search, there remains significant potential to secure a sympathetic layout for new housing and community facilities at Northbrook Park; and there are lower risks of indirect effects on conservation areas with Option 4. Taking all of this into account, the options are judged to have similar effects on heritage and are ranked equally.

The likelihood of any adverse effects is uncertain as this will depend on matters of detail concerning the design and layout of new development. Any direct adverse effects could be enduring for the lifespan of new development.

Housing

	Option 1 High growth in the A31 Corridor	Option 2 High growth in the North East	Option 3 High growth in the Southern Parishes	Option 4 High growth in the A31 Corridor and North East
Rank	2	3	2	1
Significant effects?	Yes	Yes	Yes	Yes

Discussion All of the options would deliver more than the minimum housing requirement that's been established through the Government's standard method for assessing housing needs (i.e. taking account of housing completions since 2017; existing planning permissions for housing; and the estimated delivery of new housing on unforeseen or "windfall" sites until 2036). This suggests that all options could perform well against the SA objective of ensuring that residents have opportunities to live in homes that meet their needs. Options 1 and 4 would provide the greatest number of new homes, with Option 4 including the greatest number of new homes on site options that are likely to deliver more than 10 new homes. This means that Option 4 is the best performing option for providing substantial numbers of new affordable homes in accordance with national planning policy and guidance. Option 2 would provide the smallest number of new homes and the least opportunity for delivering new affordable housing. It is worth noting that none of the options is likely to deliver the full requirement of almost 5,000 new affordable homes (2017-2036), taking account of affordable housing delivery from existing planning permissions and housing completions since 2017.

> The geographical distribution of new homes will also be important for purposes of ensuring that residents in all three sub-areas would have the opportunity to buy or rent accommodation. Options 2 and 3 provide a range of opportunities in the north east and the southern parts of East Hampshire, but within the north/A31 corridor, new housing would only be provided in Alton. Option 1 provides a wider distribution and a greater quantity of new homes in the north, in both small and large settlements (Ropley, Four Marks, Alton, Bentley), whilst Option 4 provides a good distribution of new homes in both the north and north east sub-areas. Overall, Option 4 provides the widest distribution of new housing opportunities, followed by Option 1, and then Options 2 and 3.

> The SA Scoping Report shows that one of the key issues facing the District over the plan period will be planning for the needs of an ageing population. In this context, it is noteworthy that options with a new settlement site option provide greatest opportunity for the development of substantial numbers of new supported housing and/or specialist care accommodation, in a manner that would be integrated with other forms of new housing, facilities and services. Therefore, Options 1, 3 and 4 all offer good potential to address the housing needs of an ageing population in a planned, coherent manner. The additional development at Whitehill & Bordon (under all options) could also include some supported housing/specialist care accommodation in close proximity to the new facilities and services at the town centre; although the dispersed nature of the new development sites at Whitehill & Bordon could present greater design constraints.

> Option 3 is the only option to provide substantial amounts of new housing in the southern parishes sub-area. This option therefore offers the greatest potential for addressing the housing needs of residents in the Solent sub-region/Portsmouth Housing Market Area, which is significant in the context of the PUSH Position Statement (2016), which identified a shortfall in housing provision to 2036 and the need for the local authorities to investigate opportunities to maximise development potential in the sub-region.

> Overall, Option 4 is considered to be the best performing option in terms of the SA housing topic due to the large quantity of new homes that would be delivered, because it has the greatest potential for delivering substantial numbers of affordable homes and because the opportunities for residential development are widely dispersed across the planning area. Options 1 and 3 are both considered to perform well, but for different reasons and it is therefore difficult to distinguish between the two of them. Option 1 would provide more new homes in a more geographically dispersed manner; but Option 3 concentrates housing delivery in an area that would help to deliver the outstanding

> requirements of the Solent sub-region. Option 2 is the weakest performing option because it would deliver the smallest number of new homes across a relatively small area. It is however important to note that all options could deliver significant benefits for housing provision by virtue of enabling the local plan to deliver the District's housing requirements.

> Option 4 is therefore the highest ranking option, followed by Options 1 and 3, and then Option 2. Positive effects are likely and are expected to endure for the lifespan of new housing.

Landscape and townscape

	Option 1	Option 2	Option 3	Option 4
	High growth in the A31 Corridor	High growth in the North East	High growth in the Southern Parishes	High growth in the A31 Corridor and North East
Rank	3	1	2	3
Significant effects?	Yes	Yes	Yes	Yes

Discussion Option 1 includes the rural, scenic and undeveloped Chawton Park Farm strategic site, which when viewed in the context of the East Hampshire Landscape Capacity Study (2018) performs weakly against the landscape element of the SA objective of maintaining and enhancing rural landscape and settlement character. The study identifies the wider Chawton Park area, within which the strategic site is located, as being of medium landscape sensitivity, characterised as having a "rural and generally tranquil character". Having established this context the study recommends that the Chawton Park area should "remain generally undeveloped". 30 Option 1 conflicts with this conclusion as it would deliver up to 1,250 new dwellings with limited potential to mitigate the visual impact of development at this scale. However, it should be noted that although Chawton Park has reasonably high localised sensitivity, there is strong containment provided by woodland and other vegetation, which along with surrounding topography, limits intervisibility with the South Downs National Park. Depending on the design and layout of development visual impacts beyond the boundary of the site could therefore be somewhat limited. By extension, the high level of self-containment of the Chawton Park Farm site and the absence of existing development means Option 1 is unlikely to have any meaningful effect on the wider townscape character of Alton and other parts of the A31 Corridor subarea.

> Option 2's dispersal of strategic growth across a number of sites means that the effects on landscape and townscape character are also likely to be more widely dispersed. At Whitehill & Bordon, the development of the strategic site options are likely to enhance the townscape character, and potentially the landscape character, of former industrial sites and MoD facilities, much of which is currently of poor quality. The planned new town centre has potential to be enhanced further by development through Option 2, but the more peripheral Whitehill & Bordon sites, particularly those on greenfield land, have potential to be more exposed to views in and out of the settlement and could be more sensitive in landscape terms. Nevertheless, the Landscape Capacity Study does not single out these areas for specific concern, saying that development should be "informed by further landscape work"31, likely to come forward through the application process. The designation of a large area of SANG at the western edge of Whitehill & Bordon will preserve the undeveloped state of this area and soften the landscape impact of the edge-of-town development, as well as offering the potential for restoring more of the landscape in this area to heathland. It should be noted that many of the site options at Whitehill & Bordon are 'constants' and therefore the above findings also apply to a large extent to the other options.

> For Option 2, it is also important to consider the potential effects on landscape character from the development of sites to the southeast of Liphook, as this site cluster is directly adjacent to the South Downs National Park (SDNP) boundary. By virtue of this proximity, development could clearly have potential for harmful effects on the setting of the national park and, potentially, the wider setting of

³⁰ Terra Firma Consultancy Ltd (2018), "East Hampshire District Council Landscape Capacity Study".

³¹ Ibid

Liphook. However, there are mitigating factors which are considered to substantially limit the landscape sensitivity of the south of Liphook sites. Specifically, the level of woodland cover between the sites and the SDNP provides substantial screening. The Landscape Capacity Study notes that "panoramic views [are] limited by woodland" and the Landscape Character Study (2013) observes that "significant local woodland and topography limits visibility".³² There could nevertheless be potential for an urbanising effect on the setting and townscape of existing development at southern Liphook, especially with regard to the area of special housing character (saved policy H9) at Chiltley Way.

Elsewhere within Option 2, there could be potential for development at site HEA-013 to result in a perceptual narrowing of the gap, or even coalescence, between Headley Down and Arford. This could be harmful in townscape terms as it is important to preserve and enhance the distinctive identities of the District's settlements, where possible. However, given the low density of surrounding development and the notable level of tree cover elsewhere between Headley Down and Arford, it is considered that mitigation would be possible to prevent perceptual coalescence.

There is the potential for localised effects on landscape and townscape from Option 3 in light of the proximity of the SDNP to sites at Clanfield. The landform to the north of Clanfield is undulating and there are areas of high ground with views into site CL-001 which, as discussed under the Heritage topic heading, occupies an undeveloped gap between the old and new sections of Clanfield. Therefore there could be potential for significant effects on the landscape setting of Clanfield itself, as well as the views into the settlement from higher ground within the park. Although the strategic Land East of Horndean site is also in close proximity to the SDNP, the low-lying and heavily wooded nature of The Holt provides some visual containment. Referring to the area of the strategic site as Blendworth Common, the Landscape Capacity Study notes that in terms of visual sensitivity, the site is "largely isolated from public views". The Study notes that, via the Part 2 Local Plan, "an area has been allocated for housing [and] there could be a possibility to extend this area into Blendworth Common".33 From a townscape perspective there could be opportunities to deliver a strategic development involving the existing local plan allocation and the additional East of Horndean site option, to establish a larger coherent new settlement; although conversely there is a risk that development is delivered in a fragmented and incoherent manner, potentially creating the perception of urban sprawl.

Overall, it is considered that Option 3 has a balanced performance in landscape and townscape terms. The potential for creating a coherent new settlement on land to the east of Horndean, in an area that could potentially accommodate further residential development and offering potential townscape benefits, must be offset against the potential for negative effects on landscape, and particularly local townscape, from the combined development of sites CL-001 and CL-002 at Clanfield.

Effects from Option 4 are less geographically constrained as the potential new settlement at Northbrook Park is an area of search rather than a defined site. Nevertheless, the Landscape Capacity Study proposes that the "overall management objective should be to conserve the tranquil, natural character of the Northern Wey Valley" which would be more difficult in the context of developing a new settlement, with new facilities and services, close to the border with Waverley Borough. Indeed, the study goes on to state that "[a]ny new development or large scale change...would be highly visible". However, the retention and expansion of green infrastructure, in accordance with the character of the area, could mitigate visual impacts. This area includes the historic St Swithun's Way long distance footpath, which represents a pilgrim's route between Winchester and Canterbury, and this provides a further constraint for urbanising development that would adversely affect the rural character of the Wey Valley.

The area of search is close to the boundary of the South Downs National Park, however this part of the national park (Alice Holt) is heavily wooded, so there are likely to be limited opportunities for views into the area. An additional tree belt along the alignment of the A31 further limits views to and from Northbrook Park from the south. Given the expansive blocks of woodland in the northern parts of the area of search, there is likely to be some capacity for residential/mixed use development at Northbrook Park.

For Option 4's other landscape/townscape effects (i.e. aside from those associated with Northbrook Park), it should be noted that it includes site options HEA-013 and all of the Whitehill & Bordon sites

32 Ibid

³³ Ibid

> of Option 2; so the preceding analysis in relation to these sites/areas also applies. There are also a number of site constants for all options that are noteworthy in connection with landscape/townscape issues. Adverse impacts on landscape and townscape character are possible from the cumulative development of HD-001, HD-019 and HD-024 in Lovedean, due to their close proximity to one another and the low-density, rural feel of the northern parts of Lovedean that are sensitive to the effects of urbanisation. The Council's Neighbourhood Character Study (2018) provides further details, but notes that Lovedean "[r]etains a rural village feel, despite its location at [the] edge of [a] large conurbation".

> In conclusion, it is considered that Option 2 performs best in terms of maintaining and enhancing the character of the District's rural landscapes and its settlements, in line with the SA objective. This is in light of the limited harm to landscape character likely to arise from concentrating development at Whitehill & Bordon, and the simultaneous opportunity to deliver transformation townscape enhancement in the town. There could however be locally significant adverse effects on landscape character due to the development of housing to the southeast of Liphook. Despite the potential for adverse landscape and townscape impacts at Clanfield, it is considered that Option 3 performs slightly better than the remaining options due to the fact that the largest site option (Land East of Horndean, Phase 2) could effectively represent an extension to a planned development, in an area with some woodland screening from more sensitive areas (the South Downs National Park). By contrast, Chawton Park Farm (Option 1) and Northbrook Park (Option 4) both constitute stand-alone new settlements in localities that are strongly rural in character at present.

> Option 2 is therefore the highest ranking options in terms of this SA topic, followed by Option 3 and then by Options 4 and 1. The likelihood of adverse effects is uncertain, as much will depend on the design, layout and new green infrastructure/landscaping for new development. However, some loss of rurality and tranquillity would appear likely due to the urbanising effects of new settlements/strategic extensions. Effects could be irreversible for the lifespan of development.

Resources

	Option 1	Option 2	Option 3	Option 4
	High growth in the A31 Corridor	High growth in the North East	High growth in the Southern Parishes	High growth in the A31 Corridor and North East
Rank	3	1	1	2
Significant effects?	No	No	No	No

Discussion It is important that development does not result in the unnecessary loss of higher quality 'best and most versatile' (BMV) agricultural land. The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality. Whilst recognising that the national dataset on ALC is of poor resolution, it is possible to identify in general terms that the four options appear to perform broadly on a par in relation to the highest quality land, with no areas of Grades 1 or 2 intersecting with sites in any of the options. No significant effects are predicted from any of the options as a result.

> The subdivision of Grade 3 agricultural land into 3a and 3b has not been undertaken on a national scale and Grade 3 land is therefore presumed to be best and most versatile unless evidence can be provided to demonstrate it is 3b not 3a. There is extensive Grade 3 agricultural land within each of the four options though very little of this has been surveyed for identification as 3a and 3b. In this context, Option 1 perhaps performs weakest as the strategic new settlement site at Chawton Park Farm is entirely within an area of Grade 3 land and has the potential for productive agricultural use, despite its current pastoral use. Option 4 includes the Northbrook Park area of search which also appears to be within an area of Grade 3, though little of the area is in productive agricultural use in practice. Option 2 directs the bulk of development towards existing areas of non-agricultural land at Whitehill & Bordon though the sites south of Liphook appear to be within an area of Grade 3 land.

However, the southeast of Liphook sites provide a small proportion of Option 2's overall housing distribution. Finally, whilst Option 3 includes Grade 3 land at Clanfield, the majority of development would be directed to the strategic new settlement site at Land East of Horndean. This area appears to be of poor quality in agricultural terms and the Option therefore performs reasonably well in this regard overall.

The adopted Hampshire Minerals and Waste Plan (HWMP) (2013) identifies several Minerals Safeguarding Areas (MSA) within the plan area as a whole, though only one of these appears notable in terms of the reasonable alternatives. A substantial area at Whitehill & Bordon is safeguarded for potential future soft sand extraction, including all of the central, western and northern Whitehill & Bordon sites. The HMWP notes that the area is designated for the "safeguarding of important soft sand reserves (with potential for silica sand) to prevent their sterilisation before developing the planned Eco-town. The area is safeguarded in Policy 15 (Safeguarding - mineral resources) of the Plan".³⁴ However, it is significant that recent development at Louisburg Barracks, including the relief road, falls within the same MSA. However, safeguarding issues were not an impediment to this development coming forward. A technical minerals statement produced by AECOM in 2015, to support the outline planning application at Louisburg Barracks, notes that "due to the limited opportunity to win mineral resources in the development, the relevant provisions of Policy 15 are applicable, which remove the requirement for prior extraction of mineral resources at the site".

35 It is considered likely that the Option 2 sites within the same MSA will be subject to the same outcome.

In terms of local air quality, the SA scoping report notes that there are no Air Quality Management Areas (AQMAs) within the District, reflecting the rural nature of the plan area and that the major thoroughfares of the A3, A3(M) and A31 feature few traffic controls likely to interrupt traffic flows. However, transport modelling work indicates that the future baseline position for some key junctions could see localised capacity issues, with some of these having potential to be exacerbated by development within the options (though modelling work is ongoing for the Southern Parishes subarea, so the implications for Option 3 remain unclear). For example, future capacity issues at The Square in Liphook could be worsened by additional traffic to the southeast of Liphook (Option 2). However, air quality does not present an opportunity to meaningfully differentiate between the reasonable alternatives as no option is considered likely to perform notably worse or better than any other. Additionally, as Option 3 is not yet subject to the same traffic modelling as Options 1, 2 and 4 it is not yet possible to test all options equally in terms of effects on future traffic.

In conclusion, no significant effects are predicted from any option, as none appears likely to prevent or obstruct the efficient and sustainable use of the District's resources. However, Option 1 is considered to be the weakest performing option due to the level of development directed towards higher quality agricultural land, whilst Options 2 and 3 are considered to be the best performing options as a result of directing most development towards poorer quality land.

³⁴ Hampshire County County (2013), Hampshire Minerals and Waste Plan [online], available from: http://documents.hants.gov.uk/mineralsandwaste/HampshireMineralsWastePlanADOPTED.pdf

³⁵ AECOM (2015), Louisburg Barracks Minerals Statement Technical Note [online], available via search from: https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal= EHANT_DCAPR_232708

Water

	Option 1 High growth in the A31 Corridor	Option 2 High growth in the North East	Option 3 High growth in the Southern Parishes	Option 4 High growth in the A31 Corridor and North East
Rank	1	1	2	1
Significant effects?	Yes	Yes	Yes	Yes

Discussion East Hampshire is split between the water supply areas of two water companies, with South East Water supplying the north (and therefore many of the sites for Options 1, 2 and 4) and Portsmouth Water supplying the south (and therefore many of the sites for Option 3). In this context, the Water Resource Management Plans for South East Water and Portsmouth Water provide different contexts for the reasonable alternatives for the local plan's spatial strategy. Whereas Portsmouth Water has indicated that there will be a surplus of water available, taking account of estimated requirements to 2040; South East Water's draft 2019 Water Resource Management Plan suggests there would be deficits in the supply/demand balance that would become apparent by the mid-2040s. This suggests that greater efforts to reduce and manage water demand are required in the northern parts of East Hampshire; and that the risk of water supply restrictions is greater for options focusing development in the northern parts of the District (i.e, Options 1, 2 and 4). Nevertheless, the constrained capacity in the northern sub-areas presents an opportunity for development to deliver the highest standards of water management efficiency, potentially including innovative techniques such as rainwater harvesting and greywater recycling. This could be advantageous given the uncertainties relating to climate change in respect of future rainfall.

> In terms of the potential effects of development on water quality, the situation is, however, inverted, with greater potential for adverse effects arising in the case of Option 3 compared to other options. The PUSH-wide South Hampshire Integrated Water Management Study (2018) identifies that it is not currently possible to "demonstrate with certainty beyond 2020" that new development would not result in an "adverse impact on European nature conservation designations" in the Solent region, including a number of SPAs, SACs and Ramsar sites. Therefore, there is potential that development in the southern parishes, particularly under Option 3 where more new homes and businesses would be developed in this area, could undermine the achievement of UK Government objectives for water quality. Further work is required, by means of an action plan taken forward by a PUSH Water Quality Working Group, to determine the ability of the Budds Farm wastewater treatment works to deal with wastewater to an acceptable degree; but at this stage there is a risk that new development in the southern parishes could be a contributing factor to any failures in water quality improvements that have been established for the Solent.

> In terms of water quality effects elsewhere, a notable feature is site HEA-019 in Options 2 and 4 which is located on a former waste management site. The Environment Agency has identified that there could be potential for piling activity associated with future construction to create 'preferential pathways' from the former waste site down to the aquifer below, increasing the risk of possible contamination. It is considered this risk could be managed at a site specific scale. Also relevant to water quality effects is the issue of groundwater Source Protection Zones (SPZs). These areas are designated to identify where there is a risk of contamination from activities which might cause groundwater pollution. SPZs are present across the plan area, although they are most significant in the case of Option 3, where the strategic East of Horndean site is within the most sensitive SPZ 1, or the Inner Protection Zone. This indicates contaminants would have a travel time of 50 days or less from any point within the zone, at or below the water table. SPZs are not necessarily rigid development constraints, though they can potentially require mitigation. In the case of Option 3, this could mean that it is less appropriate to discharge surface water to the ground, potentially making SuDS inappropriate for the East of Horndean strategic site. It should also be noted that Land at Brick Kiln Lane (AL-005), which is included in Options 2, 3 and 4, is located close to the source of the River Wey and is within SPZ 3, which means that all groundwater is presumed to discharge to the source. This could also affect the suitability of SuDS, or their detailed design on that site. Finally,

areas to the south of Four Marks are within SPZ 2, so that similar considerations for SuDS would apply to sites FM-001 (Option 1), FM-010 (all Options) and FM-013 (Options 1 and 4).

In conclusion, it is considered that the balance of constraints and opportunities across the four options is particularly complex and nuanced in terms of the potential effects on water as a resource. Each of the options appears to have notable strengths and weaknesses, with the southern sub-area, and therefore Option 3, performing broadly better in terms of water resources and worse in terms of water quality effects. Significantly, the potential for constrained supply in the northern areas appears to be offset by less severe strategic environmental implications of Options 1, 2 and 4. It is also important to note that any deficits in supply are only projected for the northern parts of East Hampshire beyond the plan period (after 2036), whilst water quality effects apply to the plan period itself. Projected deficits could also be viewed as an opportunity to deliver highly efficient water management practices. For these reasons, adverse effects on water quality have been considered to carry slightly more weight for purposes of ranking the performance of the options against the SA water topic.

Taking account of the foregoing, Option 3 appears to be the weakest performing option due to the greater risk of adverse effects on water quality objectives for the Solent. It is considered that Options 1, 2 and 4 perform broadly on a par, for all of these options include small site options with the potential for water quality impacts (i.e. they are located within groundwater SPZs) combined with the potential to contribute towards longer term supply deficits in the South East Water supply area. This means that Options 1, 2 and 4 are ranked above Option 3. Significant adverse effects have been identified on a precautionary basis, because of the absence of details for, and agreement on the avoidance or mitigation of adverse effects at this early stage in the plan-making process. The likelihood of adverse effects is however unknown.