



The Planning Inspectorate

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# **Report to East Hampshire District Council**

**by Jonathan Bore MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Date: 15<sup>th</sup> February 2016**

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

## **REPORT ON THE EXAMINATION INTO THE EAST HAMPSHIRE DISTRICT LOCAL PLAN: HOUSING AND EMPLOYMENT ALLOCATIONS**

Document submitted for examination on 9 July 2015

Examination hearings held between 26 October and 30 October 2015

File ref PINS/M1710/429/9



## Abbreviations Used in this Report

CIL	Community Infrastructure Levy
HRA	Habitats Regulations Assessment
JCS	East Hampshire District Local Plan: Joint Core Strategy (2014)
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NP	Neighbourhood Plan
SA	Sustainability Appraisal
SANG	Suitable Alternative Natural Greenspace
SCI	Statement of Community Involvement
SDNP	South Downs National Park
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SINC	Site of Importance for Nature Conservation
SPA	Special Protection Area

## **Non-Technical Summary**

This report concludes that the East Hampshire District Local Plan: Housing and Employment Allocations provides an appropriate basis for the planning of the District, providing a number of modifications are made to the plan. The East Hampshire District Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the modifications to address this were proposed by the Council and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications all relate to the policy criteria alone and are set out in the Appendix to this report. They are discussed in paragraphs 103 to 130. The submitted plan is unsound because many of the policy criteria are unclear or inconsistent or would potentially impede delivery of the policy. The modifications are designed to make the plan sound by remedying these issues as explained in the body of this report.

## **Introduction**

1. This report contains my assessment of the East Hampshire District Local Plan: Housing and Employment Allocations (which I refer to from now on as the Allocations Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Allocations Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft plan which was published for consultation in April 2015.
3. In accordance with section 20(7C) of the 2004 Act, the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix. The main modifications that are needed to make the Allocations Plan sound are discussed in paragraphs 103 to 130 of this report.
4. The Main Modifications that are necessary for soundness all relate to matters that were discussed at the Examination hearings. Following these discussions, the Council prepared a schedule of proposed main modifications and carried out a sustainability appraisal and this schedule has been subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

## **Assessment of Duty to Co-operate**

5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Allocations Plan's preparation.
6. The Joint Core Strategy for East Hampshire (hereafter referred to as the JCS) was prepared collaboratively by East Hampshire District Council and the South Downs National Park Authority and was adopted in June 2014. The JCS sets a long term planning framework to deliver major growth and development in East Hampshire District, and the infrastructure which supports it, in the period 2011-2028. Through its site allocation policies and proposals, the Allocations Plan implements the JCS's requirement for housing and employment for the part of East Hampshire District which lies outside the SDNP. A substantial amount of collaborative work on strategic level issues was undertaken through the JCS plan making process.
7. The Statement of Compliance with the Duty to Co-operate (June 2015, Doc CD06) lists the organisations and public and private bodies that were

consulted, the means of liaison and the joint local authority co-operation that took place leading up to the publication of the Allocations Plan. This included drawing upon information from the studies used for the JCS, discussions with neighbouring councils including the Partnership for Urban South Hampshire (PUSH) group of local authorities, and consultation with statutory consultees, local enterprise and local nature partnerships, transport operators, other public and private bodies, neighbourhood planning groups, infrastructure providers, stakeholder and public consultation and organised events.

8. The Statement of Compliance explains that a significant proportion (57%) of the district now lies in the South Downs National Park Authority (SDNPA). The Council and the National Park Authority produced the Joint Core Strategy which forms the first part of the Local Plan for East Hampshire. However, the SDNPA is now producing a Local Plan for the whole National Park which is programmed to be adopted in June 2017 and will then supersede the Joint Core Strategy for its area. This explains the difference between the plan periods covered by the JCS and the Allocations Plan on one hand and the SDNPA's proposed plan on the other, and also accounts for the fact that the Allocations Plan does not include the National Park Authority area and takes a disaggregated approach to the assessment of housing land supply (see also paragraph 48). It does not represent any failure in the duty to cooperate.
9. I conclude that, on the basis of the above, the Duty to Co-operate has been met.

## **Assessment of Soundness**

### **Preamble**

10. The East Hampshire District Local Plan Joint Core Strategy (the JCS) was adopted in June 2014. Produced jointly by East Hampshire District Council and the South Downs National Park Authority, it forms the overall framework for the East Hampshire District Local Plan: Housing and Employment Allocations (The Allocations Plan). It identifies four distinct areas of the District: the South Downs National Park, Whitehill & Bordon, North of the South Downs National Park, and the Southern Parishes.
11. The Whitehill and Bordon area is identified in the JCS as a strategic allocation for 2,725 dwellings over the Plan period to 2028. This strategic allocation does not form part of the Allocations Plan and is proceeding on the basis of policy guidance provided in the JCS and through a masterplan and a series of planning applications.
12. The Allocations Plan directly takes forward JCS Policy CP3: New Employment Provision and Policy CP10: Spatial Strategy for Housing in the JCS, which sets an overall target of a minimum of 10,060 new homes to be built over the plan period up to 2028.
13. The JCS establishes a hierarchy of settlements (paragraph 4.11). North of the SDNP, Alton (defined by the JCS as a market town) and Liphook (large local service centre) are intended to be the focus for further development. Development in Four Marks/Medstead and Grayshott (small local service centres) is primarily that to achieve sustainable communities. In the defined

villages development is limited to minor infilling and redevelopment or that which is necessary to meet specific local needs. The strategy for development in the Southern Parishes concentrates on Horndean (large local service centre) with some development accommodated at Clanfield and Rowlands Castle (small local service centres).

14. There are various emerging neighbourhood plans (NPs). That for Alton has been through examination and a referendum is expected early in 2016. The Allocations Plan does not make any allocations within the area covered by the Alton NP but includes two employment allocations, EMP1 and EMP2, which fall outside it. Bentley also has an emerging NP which is currently under examination, and the Allocations Plan again does not make any allocations within its area. In the case of Four Marks the allocation sites are included in the Allocations Plan notwithstanding the emergence of a NP because they already have planning permission.
15. The Allocations Plan is consistent with the scale and distribution of growth set out in the JCS.
16. The Main Modifications are set out in the Appendix to this report. There are 233 main modifications. There are no MMs relating to the choice of sites. Rather, they all concern the criteria for the allocations. The submitted plan is unsound because many of the policy criteria are unclear or inconsistent or would potentially impede delivery of the policy. The modifications are designed to make the plan sound by remedying these issues. As the changes to the criteria are so similar for each allocation, they are dealt with thematically, from paragraph 103 onwards, rather than by allocation, to avoid unnecessary repetition.

### **Main Issues**

17. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified three main issues upon which the soundness of the Plan depends.

**Issue 1: whether the Plan been positively prepared and based on a sound process; whether it is viable; and whether it is consistent with the JCS, other parts of the development plan and national planning policy**

#### ***Positive preparation and soundness of process***

18. The SA has been based on a sound process of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in accordance with EU Directive 2001/42/EC and Section 39(2) of the Planning and Compulsory Purchase Act 2004. The process of identifying sites has followed a logical, transparent and robust process. The process was informed by the JCS, the Sustainability Appraisal (SA02) and consultation and input from a wide range of stakeholders and the public.
19. Site options were initially screened through the process of Strategic Housing Land Availability Assessment (SHLAA). The SHLAA involved identifying and assessing all site options in the District which could potentially be available for

housing development in the period up to 2028 using criteria based on suitability (strategic and other constraints), availability and achievability. The SHLAA criteria were closely related to the issues and objectives that comprised the SA framework. The outcome of the SHLAA work was a list of about 130 reasonable housing site options for detailed appraisal.

20. The SA undertook a review of 'key context messages' in order to establish a list of key issues and objectives. It carried out work to establish reasonable alternatives that might be taken for the allocation of land at each settlement to meet the JCS requirements and achieve wider plan objectives. These included different combinations of sites and figures. Sites were assessed against a number of topics including biodiversity, climate change mitigation, community and wellbeing, economy and employment, heritage, housing objectives, landscape and townscape and water and flood risk. The impact of site selection on the settlement was then assessed including infrastructure, nature of uses and deliverability.
21. During the plan preparation period, the Council produced an Interim Housing Policy Statement (IHPS, EB03). This document, now revoked, did not form part of the development plan but was brought into effect following consultation in February 2014 because at the time the Council did not have an adequate supply of deliverable housing land for the relevant 5 year period. The IHPS led to the grant of planning permission for various sites, whilst certain others were granted permission on appeal, prior to the publication of the finalised SA report in April 2015.
22. The existence of these planning permissions had an effect on the assessment of alternatives through the SA process. For example, the SA report considered that there was nothing to be gained from an assessment of alternatives at Four Marks/South Medstead and Clanfield because sufficient sites already had permission; and it is clear that the existence of planning permissions had a direct effect on the appraisals of alternatives elsewhere. Existing permissions are highly relevant to the SA process because they are both an indication of site deliverability and clear evidence of the acceptability of a site to the local planning authority. It was unnecessary for the SA to cast the net wider to appraise combinations of other possible sites in circumstances where there was already enough housing land with planning permission. The Council was right in the circumstances to seek to improve its supply of housing land in the short term and the SA was also correct to take the approach it did.
23. A Habitats Regulations Assessment (HRA, CD07) dated April 2015 forms part of the evidence base for the Plan. The HRA for the Allocations Plan is an accompanying document for the JCS HRA which assessed the in-combination effects of all housing and other development planned for East Hampshire District. Areas screened in were the Wealden Heaths Phase II SPA and the protected areas on the Solent. The Wealden Heaths Phase I SPA which lies outside the District was screened out because visitor surveys demonstrated that there was negligible travel to these areas because of the attractive rural nature of East Hampshire District itself. This is an appropriate position to have taken. The HRA identifies Liphook and Headley as being within 5km of the Wealden Heaths Phase II SPA, and Rowlands Castle as lying within 5.6km of the Solent European sites.

24. The Allocations Plan HRA considers that the JCS HRA is still valid because the Allocations Plan does not seek to deviate significantly from the numbers assessed in the JCS HRA. It does not therefore re-examine strategic in-combination issues that were considered in the HRA of the JCS. In fact the Allocations Plan allocates 19 more dwellings within 5km of the Wealden Heaths Phase II SPA than were tested in the JCS HRA (EHALLO/9). This is not a significant deviation, and additional mitigation on site LP1, Liphook, offsets this small increase.
25. The JCS HRA examines each preferred site allocation to see whether it would present any potential for site-specific impacts on Natura 2000 or European designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites (sites designated under the Ramsar convention). The HRA concluded that subject to a recreational mitigation scheme for one site in Liphook and measures to mitigate effects at the Rowlands Castle sites there would be no likely significant effects on the European designated sites.
26. The plan takes into account the findings of the HRA and proposes on-site mitigation on a case-by-case basis where sites fall within the relevant zones. The approach clearly satisfied Natural England, who raised no objection. I consider that it is soundly-based in its approach to the requirements under the Conservation of Habitats and Species Regulations 2010.
27. The scale and distribution of the housing in the JCS, which was subject to in-combination assessment by the JCS HRA, is now embedded in the Allocations Plan and has not changed from the JCS. Paragraph 167 of the Framework states that assessments should not repeat policy assessment that has already been undertaken. I can see no advantage to be gained in reassessing the in-combination issues that were examined in the HRA for the JCS. The HRA is soundly based and an appropriate study on which to base the Allocations Plan.
28. The plan has been positively prepared and is based on co-operation with neighbouring authorities and public and private sector organisations. It reflects the principles of sustainable development. The allocations are justified by a comprehensive and proportionate evidence base.

### ***Viability***

29. The Adams Integra viability report (EB10, June 2015) indicates that all the residential sites would generate surpluses except for Green Lane Clanfield (Site CF1) – but that site is already under construction. Whilst some representations referred to potential delays and infrastructure costs on some sites, notably at the Lord Mayor Treloar site in Alton (in the NP area) and site HN1 in Horndean, the viability report indicates that, even allowing for infrastructure costs, adequate surpluses would be available on these and the other residential sites. The achievable values on the two allocated employment sites in Alton, EMP1 and EMP2, would not generate sufficient value at this stage of the economic cycle and this might also apply to the allocated employment land which forms part of HN1. However, relatively modest changes in investment demand would enable appropriate values to be achieved. The Council is likely to bring in CIL in the near future but the study comes to similar conclusions on the viability of the sites with CIL in place. I am

satisfied that the sites are realistically deliverable in the near future in viability terms and within the plan period.

### ***Consistency with the JCS***

30. Turning to compliance with the JCS, the housing and employment distribution are in accordance with Section 3 and Policies CP2 and CP3 of the JCS and the provision for housing is in accordance with JCS Policy CP10. The latter policy is expressed in terms of minima, as are the major allocations in the Allocations Plan. There are other planning permissions which take the total number of dwellings on deliverable and developable sites to a higher figure than the minimum 10,060 dwellings specified in Policy CP10; hence the minimum requirement is adequately exceeded as envisaged by the JCS. This report will return to the issue of housing provision later.
31. Site selection has been undertaken by settlement, not by parish, which is a sensible approach because it addresses the needs of individual settlements. It is inevitable that some allocations (such as HN1) cross boundaries into other parishes, and in other locations such as between Horndean and Clanfield there is some blurring of the edges between settlements, but it is quite clear that the Allocations Plan has ascribed the right numbers of homes to the right settlements in accordance with the JCS.
32. Some of the criteria in the submitted Allocations Plan duplicate or diverge from the JCS. The Council has undertaken a complete review and overhaul of the criteria and main modifications are proposed which bring the plan into line with the JCS in this respect. Some criteria from the submitted plan have been dropped altogether in the modifications on the basis that the JCS provides a full and adequate policy background. These include for example criteria relating to flood water, ground water and energy, whilst the criteria on heritage assets have been simplified for the same reason.
33. Subject to these modifications I consider that the Allocations Plan is fully compliant with the JCS.

### ***Consistency with other development plan documents***

34. The only issue that has arisen in this respect is that of mineral investigation. The County Council as Minerals Authority has suggested additional site criteria requiring the investigation of minerals potential before housing development on certain sites within the Mineral Consultation Areas or the Mineral Safeguarding Areas as set out in the Hampshire Minerals and Waste Plan policies map. However, these have rightly not been included by the Council as modifications. This is not an appropriate approach to the identification of minerals sites because such criteria would create uncertainty as to whether the housing development could take place, impede the delivery of the affected employment and housing sites and conflict with the Framework's objective of significantly boosting the supply of housing and ensuring a 5 year supply of housing.

### ***Consistency with the National Planning Policy Framework (the Framework)***

35. The policies and proposals of the Allocations Plan are consistent with the Framework with the exception of some of the site allocation criteria. These are identified later in my report and main modifications are therefore necessary for their soundness. In the case of heritage assets the criteria have been simplified because the Framework (and the JCS) provide a much more comprehensive policy framework.

**Issue 2: whether the Plan allocates sufficient land in the right locations to achieve the spatial strategy set out in the JCS and whether it is flexible enough to cope with changes in circumstances that may arise.**

***Overall housing provision to 2028***

36. The JCS sets the total housing requirement for the whole District at a minimum of 10,060 dwellings from 2011 to 2028. Objectively assessed housing need was established through the JCS Examination at around 610 dwellings per annum, or 10,370 dwellings for the whole of the plan period to 2028.
37. The difference between the two figures indicates the desirability of a modest degree of provision above the minimum figure set by the JCS. But the general overall quantum and strategy in the JCS are clear. The substantially higher figures proposed in some representations to the Examination (in excess of 12,000 in some cases) would amount to a different plan which would not accord with the intentions or strategy of the JCS. The amount of housing allowed for in the Allocations Plan is in accordance with the JCS.
38. The total of 10,060 homes in the JCS includes 2,725 within the strategic allocation of Whitehill and Bordon, together with the completion of existing permissions and allocations, development within settlement policy boundaries, and the allocation of sites as set out in JCS Policy CP10, namely:
- A minimum of 700 dwellings at Alton and Horndean and Petersfield
  - A minimum of 200 dwellings at Clanfield
  - A minimum of 175 dwellings at both Liphook and Four Marks/South Medstead
  - A minimum of 150 dwellings at both Liphook and Rowlands Castle
  - A minimum of 150 dwellings at other villages outside the National Park
  - A minimum of 100 dwellings at other villages in the National Park.
39. Table 1 in the document Matter 2/EHDC submitted to the Examination demonstrates that the supply of housing land in these identified settlements will exceed the above figures in every case. Allocations and commitments are expected to deliver some 2,837 dwellings in the plan area compared with the requirement under JCS Policy CP10 of a minimum of 2,250 dwellings. The figure for Four Marks/South Medstead is over 80% higher than the JCS requirement, which on the face of things appears higher than might be

expected, but this is simply reflective of the planning permissions that have been granted there. The distribution of the allocations in the Allocations Plan conforms with the spatial strategy and numerical distribution of homes set out in Policy CP10 of the JCS.

40. Many of the sites in the Allocations Plan already have planning permission for housing. 16 of the allocated sites have planning permission to deliver 1,541 dwellings, of which 996 are deliverable between 2015 and 2020. However, there is no double counting since the permissions were granted after July 2013. They are not pre-existing commitments; rather, they are sites that contribute to the total JCS housing requirement during the plan period. As already indicated, the existence of permissions had the effect of reducing the number of alternatives examined through the SA but it would have been illogical to ignore them. To discount sites because they have planning permission and to allocate further sites would result in housing provision significantly in excess of the intentions of the JCS.
41. As referred to above, the Allocations Plan does not include the areas covered by the Alton and Bentley Neighbourhood Plans (NPs) and the issue arises as to whether they are able to deliver homes to meet both the overall target and the 5 year housing land supply, and whether other sites should be allocated as a contingency. Up to 2020, 723 dwellings are intended to be delivered at these settlements (Matter 2/EHDC para 7.6). At the time of writing these NPs cannot carry full weight as they have not been adopted, but the Alton NP has been through Examination and the Bentley NP is at Examination, so they are well advanced, and there is no strong evidence that they will fail to progress to adoption. There is clear intent to make the necessary allocations in the NPs and to see the plans through.
42. Site HN1 in Horndean, the Lord Mayor Treloar Hospital site in Alton and the Whitehill/Bordon strategic allocation are larger sites requiring infrastructure and could therefore carry some potential risk for the delivery of the overall housing requirement. However, the picture for all three is relatively optimistic. On site HN1, there is a resolution to grant planning permission with the probability of a signed planning obligation in the short term. The site is divisible into three with the first northern phase capable of early commencement subject to limited highways works. The Lord Mayor Treloar Hospital site is the subject of a hybrid permission with detailed permission for works to Butts Bridge with work scheduled for early 2017. Whitehill/Bordon falls into a number of parts but key early phases (Quebec Barracks) have planning permission and are under way, with a relief road under construction, whilst Bordon is at the stage of a resolution to grant permission and has a clear programme for the relief road, town centre and Suitable Alternative Natural Greenspace (SANG). The current position on all of these sites gives enough confidence that they will deliver homes in accordance with the JCS trajectory and does not lead to the conclusion that additional allocations need to be made in the interests of flexibility.
43. Site LP1 in Liphook has recently been the subject of a refusal of planning permission but the site is a natural extension of a development that is currently under way and it appears that it is the highway mitigation work that may require further investigation in order to produce a successful scheme. The

site is clearly developable within the life of the plan.

44. On all the other allocated sites, various factors point towards the probability of delivery. All residential sites but one are judged to be viable and the one site that appears not to be is actually under construction. Most allocated sites are of modest size requiring limited infrastructure, and a high proportion have planning permission.
45. In conclusion, taking allocations and recent permissions into account, sufficient land is allocated by the Allocations Plan to ensure that JCS housing provision is met. Whilst the requirements are set as minima, it is clear that the Allocations Plan together with other commitments and permissions will provide for a greater number than the minimum requirement in all locations specified in JCS Policy CP10(4). Moreover, on the available evidence, the sites are deliverable within the period of the Plan.
46. There is therefore no reason for the Council to modify the Allocations Plan to include additional allocations or reserve sites in anticipation of these sites failing to make progress. Continued monitoring will enable the Council to take appropriate action in the future were this to occur.

### ***The 5 year supply of housing land***

47. The Council's Five Year Housing Land Supply calculation (1 April 2015) is based on 'Liverpool' methodology and a 5% buffer. These approaches were considered at the JCS Examination. The reason for adopting the Liverpool methodology was because the strategic sites formed a substantial part of the housing land supply and were expected to deliver over the life of the JCS. That methodology is incorporated in the plan and is apparent in the trajectory set out at Appendix 2 of the JCS. The JCS was adopted less than 2 years ago; the strategic sites still form an important part of the housing strategy. Things have not changed. Therefore, notwithstanding the comments in certain appeal decisions, there is no reason at all to depart from the Liverpool methodology in the calculation of a 5 year supply of housing. As far as the buffer is concerned, the JCS Inspector was clear that there was no record of persistent under-delivery (footnote 36) and I agree. He reached that conclusion at a time when there was actually a shortfall in the 5 year supply. The Council acted swiftly to rectify that shortfall. The point must therefore be re-stated, and perhaps with some force, that there is no record of persistent under-delivery. A 5% buffer is the right approach.
48. The Council has taken a disaggregated approach to the calculation of the 5 year housing land requirement: whilst the JCS housing requirement covers the whole District, the 5 year calculation now only applies to the part of the District outside the SDNP. There are sound reasons for this (see paragraph 8 of this report). Attempting to maintain a whole district approach towards the calculation would be inappropriate in a situation where decisions concerning the supply of housing in a large part of the District lie outside the Council's control.
49. The use of the Liverpool method, the 5% buffer and the disaggregated approach are therefore all supported.

50. The Council calculated at 1 April 2015 that it had 6.71 years' supply of housing. (EB02/1). Since that time it has granted planning permission for 750 dwellings. On the face of things this appears to be a healthy supply, and it stands up under scrutiny.
51. The Council's detailed analysis of 6 large sites set out in EB/22 enables a picture to be built up of the ability of these sites to contribute towards the 5 year land supply. Five of these sites are not actually in the Allocations Plan as they are either strategic sites or fall within the Alton Neighbourhood Plan area. However, they are relevant because any slippage would have implications for housing delivery in the Allocations Plan. These are:
- Land east of Selborne Road and land at Lord Mayor Treloar Hospital site, Alton (see also paragraph 42). The Hospital site is in the ownership of the Homes and Communities Agency (HCA) who are scheduled to market the site in Spring 2016, and it has planning permission for residential development. There are a number of reserved matters and conditions to meet, and work is required to replace Butts Bridge, and to undertake a range of highway works. However, 50 dwellings can go ahead before the bridge works take place, which are scheduled for January to March 2017, and some housing delivery can occur before the completion of the highway works. The Council's suggestion that 226 units from this site could be included in the 5 year supply to April 2020 appears reasonable.
  - Land at Cadnam Farm, Alton. Planning permission has been granted for 275 dwellings and discussions are under way regarding the provision of off-site traffic calming, highway work and a sewer. Housing developers already have an interest in all the land. The whole site appears deliverable within the 5 year period.
  - Land at Will Hall Farm, Alton. This is a relatively unconstrained site with planning permission and is capable of delivering the full 180 dwellings.
  - Louisburg Barracks, Bordon. This site is in the ownership of the HCA and there is a developer. The site has outline planning permission, with full permission having been granted for Phase 1 of the link road. The Council's figure of 246 dwellings within the 5 year period is in line with the developer's build-out rate of 80 dpa and appears reasonable.
  - Land at and adjoining Bordon Garrison, Bordon. The site is subject to a resolution to grant planning permission with a s106 obligation due to have been signed in December 2015. The scheme forms part of a national new communities housing programme that has received financial support from the government to accelerate housing delivery. A developer has an interest in the development and is intending an enhanced delivery programme to March 2020. The figure of 280 units within the 5 year period appears realistic in this context.
  - Land East of Horndean, Rowlands Castle Road, Horndean. This is site HN1 in the Allocations Plan. It is subject to a resolution to grant planning permission subject to a planning obligation. The northern part of the site is capable of development without major infrastructure works and includes a 60 bed care home and 120 assisted dwellings. Some of the adjacent area has also been

identified as deliverable within 5 years. I consider that the Council's overall figure of 275 within 5 years for this site is realistic.

52. The evidence given by the Council to the Examination demonstrates that the key large sites are likely to deliver the anticipated numbers of homes within the first 5 years. There is therefore no need to make additional land available in the Allocations Plan for extra housing to provide additional flexibility in case of slippage. Monitoring of delivery will enable the Council to take any action necessary should delivery start to fall below that anticipated.

### ***Housing mix***

53. JCS Policy CP11 seeks to maximise the delivery of affordable housing, requires a range of dwelling tenures, types and sizes to meet housing needs and seeks to ensure that housing is provided to meet a range of community requirements. The overall housing provision in the JCS incorporates an element of affordable housing and JCS Policy CP13 requires all residential development of one or more additional dwellings to contribute towards affordable housing, with a target of 40% of all new dwellings to be provided as such (35% at Whitehill and Bordon).
54. The assessment of overall housing need and the relationship with affordable housing are set out in the Inspector's report to the JCS and will not be repeated here. There is no persuasive evidence that when developments have come to be implemented, the provision of affordable housing has fallen so significantly behind target as to jeopardise the JCS strategy.
55. Recent housing waiting list evidence, dated October 2015, translates into a need for 1,503 affordable dwellings. (EHALLOC/10). The Council contend that the expected affordable housing provision through permissions and allocations, including the strategic allocations and sites in the National Park, would deliver some 1672 affordable homes to 2028, to which an additional contribution from windfall sites should be added. This figure is encouraging, in that it is in excess of the current waiting list, but of course the list is a snapshot, not a requirement to 2028, and it is evident that there remains a need for affordable housing.
56. However, this need was recognised by the JCS Inspector in his report and in consequence the overall housing requirement was set by the JCS at a level in excess of demographic projections. In other words, the strategy for the provision of affordable housing, including the proportion to be delivered by housing sites, is embedded in Policies CP10 and CP13 of the JCS and there is no evidence that the Allocations Plan would fail to deliver this strategy.
57. The Council's projections for affordable housing delivery include contributions from small sites in accordance with JCS Policy 13. It has also analysed the position (in EHALLOC/10) that would arise if small sites were to be exempted from affordable housing, as had been the Government's intention prior to the West Berkshire District Council and Reading Borough Council judgment. It is estimated that up to 208 affordable homes would not be developed by 2028 if this were the case. However, the remaining supply would still meet 93% of the identified demand, and meanwhile the development plan has primacy in law. In the current circumstances there is no need to allocate further land to

compensate for the possibility that small sites might at some future date be exempted from the requirement to provide affordable housing.

### ***Employment***

58. Policy CP3 of the JCS seeks the provision of about 7ha of employment land in Alton and 2ha in Horndean. The Allocations Plan contains two employment allocations, EMP1 (7ha) and EMP2 (3ha), at Alton outside the Neighbourhood Plan area and 2ha of business and industrial land in allocation HN1, Land East of Horndean. The environmental effects of allocations EMP1, EMP2 and HN1 have been adequately considered and the policy criteria (subject to the main modifications) address the constraints of the site and the mitigation measures required. The scale and location of the provision is in accordance with the JCS.

### ***Spatial strategy: settlements***

59. As previously mentioned, the MMs all relate to the site allocation criteria. There are a number of common themes so the MMs and the reasons why they are needed to make the plan sound are dealt with in paragraphs 103 to 130 below.

### ***Alton***

60. As previously mentioned, a neighbourhood plan has been prepared for Alton so the Allocations Plan does not make housing allocations in the town. Some objectors have suggested that the Allocations Plan should include additional housing sites, such as at Windmill Hill, Will Hall Farm and Holybourne, but the selection of sites has already been considered by the neighbourhood plan, which is at an advanced stage and has already been through examination. The probability of the adoption of the neighbourhood plan has already been discussed. The ability of key sites in Alton to contribute to the overall housing requirement and to the 5 year housing land supply, are all discussed above, with the conclusion that it is not necessary for the Allocations Plan to allocate further housing land either within or outside the NP area at Alton in the interests of further flexibility.
61. Employment allocations EMP1 and EMP2 are both at Alton but outside the area of the neighbourhood plan and are discussed in the previous section of this report. It is proposed however following the examination to make some MMs to the development criteria – as for all allocated sites.

### ***Horndean***

62. The JCS requires allocations to be made to provide a minimum of 700 dwellings at Horndean. Site HN1 is the principal site in Horndean, and indeed the largest housing site in the Allocations Plan, with an allocation of about 700 new dwellings, 2ha of industrial and business use and a new school. The site is in an appropriate location and in accordance with the JCS. Its ability to deliver housing is discussed in paragraphs 42 and 51 of this report with the conclusion that it will make an adequate contribution to the 5 year supply of housing land and to the overall housing requirement over the life of the plan. Additional housing is now proposed for the site which would raise the total number of homes of the site to 820.

63. It has been suggested that, in allocating site HN1, the Allocations Plan is putting all its eggs in one basket to the exclusion of other suitable sites. But the site offers the opportunity to deliver the number of houses required at Horndean by the JCS in a coordinated manner over much of the plan period, is reasonably well located in relation to the town centre and highway network, and provides the ability to invest in new physical and social infrastructure on and adjacent to the site, notably the highway works and the school, homes for older people and employment uses. None of the other sites suggested by objectors have such significant advantages over the allocated site as to suggest that the plan has been unsound in its site selection process. Most if not all sites are smaller and less capable of delivering the same range of homes or facilities individually or in combination. Some, such as Southdown Road, would have significant landscape impact. Many are in peripheral locations less well connected to the wider highway network. Chalk Hill Farm is more central but is much smaller. Given the conclusion that site HN1 is capable of delivering in accordance with the JCS, (and indeed now with a higher number of homes than in the JCS) it is not necessary for other sites to be allocated in the interests of flexibility. Clearly, monitoring will demonstrate whether the housing trajectory remains on course.
64. Most large housing sites will require on-site remediation for ground conditions and HN1 is no exception. The site has around 40 known sink holes and it will be necessary to avoid groundwater contamination, and these matters will require site remediation and preparation. But these are not uncommon issues. There is nothing particularly unusual about the site that would suggest that it would fail to deliver the expected number of homes within the projected period either in terms of site conditions or indeed highway access.
65. Whilst there is no doubt that some traffic from the site would travel towards Rowlands Castle, the highway evidence indicates that the majority of vehicles would use J2 of the A3(M) with others using Havant Road. One of the criteria attached to allocation HN1 seeks mitigation measures on adjoining residential roads, which does not fit the circumstances, but **MM23** changes that to mitigation measures on the local and strategic road network (see also paragraph 108); this will enable the Council to consider whether specific measures need to be taken in respect of the impact on Rowlands Castle. **MM22** splits access to the site to limit the impact on Rowlands Castle Road.
66. Allocation HN1 includes criteria requiring extra care for the elderly and a new 2FE primary school. These no longer reflect current thinking for the site and **MMs 18, 19 and 21** appropriately update the position to include a new care village including independent living units and extra care provision for older people, and a new primary school with land for expansion, as well as various community facilities. **MM22** clarifies the position regarding vehicular access to reflect the planning permission. These modifications make the plan sound.
67. There are no issues in respect of site HN2, an allocation of about 40 dwellings on land to the rear of 185-189A Lovedean Lane. It already has planning permission. The allocation criteria are however recommended for modification to ensure that the Allocations Plan is consistent with the conditions attached to the planning permission, and consistent with the other modifications.

### **Liphook**

68. The JCS seeks a minimum of 175 dwellings at Liphook. The Allocations Plan allocates land for about 175 dwellings on site LP1 at Lowsley Farm. Site LP1 is the only allocation in Liphook, but it is a sound choice, meets the JCS requirement and is deliverable. It is a natural extension of an existing development site and indeed access would be gained from the adjacent site. It is possible to walk into the centre of the village and there is good access to the A3 and the strategic road network. Although there has been a recent refusal of planning permission for the site, the issues are capable of resolution through the provision of traffic management measures in the village. These are covered by the criteria to the allocation as modified, one of which is to ensure that any negative traffic impact is mitigated on the local road network including Longmoor Road (**MM42**).
69. It is neither necessary nor desirable to allocate other Liphook sites in the Allocations Plan. Liphook is a sustainable settlement with retail and community facilities, but it has a number of constraints. These include the proximity to the Wealden Heaths SPA Phase II and the tight and rather congested road network in the centre of the village, both of which understandably limit its development potential. Other sites in Liphook, including Chiltley Farm, Old Shepherds Farm and land west of Headley Road, have been suggested but none of them has such obvious advantages over the allocated site as to cast doubt on the soundness of the site selection; they have no significant advantages in terms of countryside impact or pedestrian or highway access.

### ***Clanfield***

70. The JCS requires allocations to provide a minimum of 200 dwellings at Clanfield. Site CF1, land at Down Farm, is allocated for about 207 dwellings. The site has planning permission and is already under construction. Site CF2, Drift Road, allocated for about 11 dwellings, has been completed and site CF3, Trafalgar Rise, allocated for about 18 dwellings, is almost complete.
71. It has been suggested that, given the advanced stage these sites have reached, the allocations for Clanfield will be built out early within the life of the plan leaving no further opportunity for adding to Clanfield's housing stock for a number of years. However, the plan monitoring process and future SHMAA work will enable the Council to assess further housing needs in the area and if necessary revise or renew the plan.
72. The allocations for Clanfield exceed the JCS minimum requirements so, whilst a number of additional sites have been put forward in representations, there is no need to allocate further sites in the Allocations Plan to serve the needs of Clanfield.
73. A number of representations relate to the criteria for the allocation. The Council have put forward MMs to change the criteria to reflect the terms of the planning permissions.

### ***Rowlands Castle***

74. The JCS requires allocations to provide a minimum of 150 dwellings at Rowlands Castle. Site RC1, land at former Rowlands Castle Brickworks, The Drift, is allocated for about 34 dwellings; site RC2, land south of Oaklands, is

allocated for about 106 dwellings, and site RC3, land north of Bartons Road, is allocated for about 17 dwellings. All three sites have planning permission.

75. Various additional sites have been put forward in representations, but it is unnecessary to make further allocations, because the minimum requirement of 150 dwellings is already exceeded. The figure is currently exceeded by only 7 dwellings, but it is nonetheless met. As with Clanfield, the plan monitoring process and future SHMA work will enable the Council to assess further local housing needs and if necessary revise or renew the plan.
76. A case was put forward in respect of land at Deerleap that recent planning permissions will cause the site to be largely enclosed by development. However, it is not necessary to make a further allocation to meet the JCS requirements and any anomalies in the settlement boundary, if they exist, can be considered as part of the work leading to the forthcoming production of the Council's development management DPD.
77. A number of representations relate to the criteria for the allocation. The Council have put forward MMs to change the criteria to reflect the terms of the planning permissions and these are dealt with from paragraph 103 onwards.

#### ***Four Marks and South Medstead***

78. The JCS requires allocations for a minimum of 175 dwellings. Site FM1, Lymington Farm is allocated for about 107 dwellings, FM2, land at Friars Oak Farm, Boyneswood Road, is allocated for about 79 dwellings, and site FM3, Land north of Boyneswood Road, Medstead, is allocated for about 51 dwellings. All three sites have planning permission.
79. There are additional housing commitments in Four Marks and South Medstead amounting to some 79 dwellings that are not allocated in the plan. The overall JCS requirement is significantly exceeded and although additional sites have been put forward in representations there is no need to allocate further sites. Indeed, any significant further increase could begin to conflict with the JCS in terms of the scale and distribution of development between the settlements.
80. Matters relating to the selection of sites, and in particular the allocation of sites with planning permission, are dealt with above in paragraphs 21, 22 and 40.
81. A neighbourhood plan has been prepared for Four Marks/South Medstead, but it does not include housing allocations given that three allocated sites and other committed sites already exceed the JCS requirement.
82. It has been suggested in representations that the settlement boundary should be altered to take into account the new position arising from the allocation of site FM2. That is a matter for either the Neighbourhood Plan or for the Council to consider in its forthcoming development management DPD.
83. A number of representations relate to the criteria for the allocation. The Council have put forward modifications to change the criteria to reflect the terms of the planning permissions.

### ***Villages north of the South Downs National Park***

84. The JCS indicates that a minimum of 150 dwellings should be allocated in the villages north of the South Downs National Park. The villages are considered individually below.

#### ***Bentley***

85. The Allocations Plan indicates that Bentley will account for about 50 dwellings. A neighbourhood plan has been produced for Bentley, so the Allocations Plan does not allocate any land in the village. The Bentley Neighbourhood Plan is only proposing an allocation of 10 dwellings, but that is because planning permission has already been granted for 37 homes, with another scheme for 5 dwellings at appeal.
86. Clearly the Council might need to take further action in respect of housing delivery if the Bentley Neighbourhood Plan is not made, but the neighbourhood plan is well advanced, having gone through the examination stage, and there is little to suggest that it will not proceed. In consequence there is no need for the Allocations Plan to allocate land at Bentley as a contingency measure or to add additional flexibility to the plan.

#### ***Bentworth***

87. Site VL1 at the corner of Church Street and Ashley Road is allocated for about 12 dwellings. The anticipated number of dwellings for this allocation is higher than that included in an earlier consultation version of the plan and has led to a number of representations. Whilst linear development alone might not be possible, a development of 12 dwellings on this site would still have a low density, not out of keeping with the area, and would have the benefit of achieving some affordable housing for the village. The Council's approach is sound.

#### ***Farringdon***

88. Site VL2 is an allocation of land at Crows Lane for about 8 dwellings. Modifications affecting this site dealt with from paragraph 103 onwards.

#### ***Headley / Headley Down***

89. Site VL3, land at Headley Nurseries, Glayshers Hill, Headley Down is allocated for about 12 dwellings. The allocated area is 0.4 ha, which is not an extensive development, so it would be possible to retain trees and planting (in respect of which, see also paragraph 114 of this report). It would also be small in proportion to the village and its visual impact would be relatively limited, so there is no reason why it should be out of character with the village. The number of vehicle movements from a development of this size would not be significant; the access would be via a simple T junction on to a 30mph road and the highways authority have raised no objection. Visibility splays would be required commensurate with the speed of traffic.
90. The site lies within 5km of the Wealden Heaths Phase II SPA but the policy criteria as modified include a requirement to provide adequate measures to

avoid or mitigate any adverse effects on the Wealden Heaths Phase II SPA (**MM157**).

91. The choice of site VL3 is sound.

92. Site VL4 is an allocation for about 7 dwellings on land south of Headley Fields, Headley. Planning permission has already been granted. The Council propose to modify the criteria in the submission plan to reflect the terms and conditions of the planning permission.

### ***Holt Pound***

93. Site VL5, land adjacent to Linden, Fullers Road, Holt Pound, is allocated for about 12 dwellings. This is a higher figure than was included in an earlier consultation draft of the plan and has generated a number of representations.

94. The site is overgrown and now contains some young trees, so inevitably housing would result in a change of character. In addition, the number of dwellings combined with the site constraints would mean that houses would have to be set back from the A325 with appropriate noise mitigation. It is evident that development of the scale envisaged would alter to a degree the character of the entrance point into the village from the A325. A scheme has recently been refused on appeal partly because of the impact on the character of the locality.

95. Nonetheless, this is the Council's plan, and it is through the plan-led system that conscious planned changes may be made in order to accommodate development to meet people's needs. In this case, a development of this size would make a reasonable contribution towards both market housing and affordable housing in the village. 12 dwellings on 0.74 ha is still a relatively low density, so the change of character resulting from the allocation would be localised. That might not be the case were the number to be increased further. The allocation and the number of dwellings indicated are both appropriate.

96. The site lies more than 5km from the Wealden Heaths Phase II SPA so **MM173** deletes the requirement for a screening assessment.

97. Site VL6, land adjacent to Stream Cottage, Fullers Road, Holt Pound is allocated for about 5 dwellings. There has been a recent appeal decision in which a dwelling behind the frontage was considered unacceptable. However, the choice of 5 dwellings in the Allocations Plan is a matter for the Council. The site is large enough to accommodate the number proposed, and whether or not this means creating smaller plots or an element of non-frontage development, and this does not mean that development will of necessity be out of character. There are a number of other small plots in the village. These are not matters that affect the soundness of the plan. The site can be developed for this number without harm to the character of the village and the policy contains a criterion which seeks to ensure that development will have a design and layout of high quality and a character which respects the village.

98. As with site VL5, the site lies within 5km of the Wealden Heaths Phase II SPA, and in this case the policy criteria as modified (**MM182**) seeks adequate measures to avoid or mitigate any adverse effects on the SPA. The other

criteria for this allocation are dealt with below from paragraph 103 onwards.

### ***Medstead***

99. Site VL7, land to the rear of Junpers, South Town Road, is allocated for about 12 dwellings. Notwithstanding the prior agreement between the Council and the Parish Council that this site could be omitted were it to be considered unnecessary in order to meet housing requirements, the Council has retained the allocation in the submitted plan and has not proposed a modification to remove it. I am therefore bound to consider it as part of the Council's plan. The site, though at the back of existing development, is relatively unconstrained and the density envisaged by the allocation, 12 dwellings on 0.8ha, is low and in keeping with its surroundings. The allocation supports the objectives of the Framework and the JCS by helping to boost the supply of housing and providing flexibility in meeting housing requirements. Its removal is not required to make the plan sound so I am not proposing such a modification.

### ***Ropley***

100. Site VL10, land adjacent to Bullfinches, Park Lane, Ropley, is allocated for about 7 dwellings; VL11, land at the corner of Dunsells Lane and Gilbert Street, for about 15 dwellings; VL12, land off Hale Close, for about 5 dwellings; and VL13, land south west of Dean Cottage, Bighton Hill, Ropley Dean, for about 15 dwellings. Sites VL11 and VL13 already have planning permission for housing.
101. There are representations that seek further allocations at Ropley, but Ropley is a rather scattered village with different parts built along a number of minor roads, and some of the suggestions would simply perpetuate the scatter of development as well as adding vehicles to very narrow country lanes. In these circumstances the Allocations Plan is right in restraining the number and size of allocations.

### ***Other settlements***

102. No allocations have been made in other settlements, but some representations have suggested allocations in places such as Grayshott, Lindford, Chawton, and Beech. Grayshott is recognised by the JCS as a small local service centre, but the JCS does not seek any housing provision there, so an allocation would not strictly conform with the JCS. If future monitoring were to reveal local housing requirements that needed to be satisfied in Grayshott, it would be for the Council to take necessary action. The other settlements are small and the amount of housing required by the JCS for the villages to support rural communities is already met by the Allocations Plan, so no further village allocations are required.

### **Major modifications (MMs) in respect of site criteria**

103. The main modifications necessary to this plan all relate to site criteria. Many of the criteria in the submitted plan are unsound because they are unclear, imprecise or do not properly address the policy issue or specific site conditions. Some are better expressed by policies in the JCS or the National

Planning Policy Framework. Others are inconsistent with the terms of extant planning permissions. The modifications ensure that the plan is sound. At first sight there appear to be a great many modifications, but this is because similar site criteria are used for each policy, so changes to those criteria are repeated throughout the plan and the Council has given each a unique modification number.

104. The criteria attached to most of the site allocations are very similar. They relate for example to traffic measures and vehicle access; movement; biodiversity; flood risk; energy and so on. Therefore, rather deal with the modifications by allocation, it is simpler to deal with them thematically.
105. It is important to note that the MMs are based on CD01, the submitted Allocations Plan. Following consultation on the submission Allocations Plan, the Council had set out a number of proposed changes and additions to criteria and put them into a track changed document, CD03, entitled "Housing and Employment Allocations incorporating minor modifications". This document had no official status in the development plan process, but it was referred to extensively during the Examination as it represented the Council's thinking at the time.
106. A number of the proposed changes in CD03 would have been inappropriate. Among other things, the document included at the County Council's request requirements to investigate the mineral potential on certain allocated sites prior to development. This would not have been sound and the matter is dealt with in paragraph 34 above. The Council were advised not to include such criteria and have rightly omitted them from their list of modifications. It should be noted that any proposed change (such as the minerals criterion) that appeared as a track change in CD03 but has since been deleted by the Council does not count as a modification.

### ***Allocation policies and criteria by theme***

#### ***Policy structure and wording***

107. The introduction to all the allocation policies begins with the following statement: "The site will be developed in accordance with the following site specific criteria." However, the criteria are inconsistent with this statement, and include a variety of terms such as "Provision of" "Implement" "Consider" "Ensure", resulting in vagueness and lack of clarity. MMs 1, 11, 20, 33, 41, 52, 63, 71, 77, 89, 102, 111, 120, 127, 138, 147, 153, 160, 168, 177, 185, 192, 199, 206, 213, 219 and 226 change the introduction to each of the allocation policies to the following consistent structure: "Land at ... is allocated for ... on ...ha. Development shall:..." This sets a clear context for the criteria to follow.

#### ***Traffic impact***

108. Most of the allocation policies in the submitted plan seek the implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads. This is not a sound criterion, partly because such measures may not always be justified by the scale, nature and location of the development, and partly because the traffic impacts may not fall on (or not fall solely on) residential roads. **MMs 3, 12, 23, 34, 42, 54, 65, 72, 78, 90,**

**103, 112, 121, 128, 139, 154, 162, 170, 178, 179, 186, 193, 200, 207, 214, 220, 227 and MM233** propose to replace it with a criterion which seeks to ensure that any significant negative traffic impact is mitigated on the local road network, and in the case of site HN1, on the strategic network too. The word significant is relevant because if an impact is insignificant it will not need to be mitigated. The significance of the impact will need to be evaluated and proportionate measures taken to mitigate the impact of the scheme on any part of the local network, including residential and non-residential roads. Mitigation measures need not fall on the public purse; the criterion will normally be taken to mean that development contributions will be required for off-site mitigation. The criterion as modified is sound. **MM233** (site VL2) was accidentally omitted from the list of MMs consulted on by the Council but since it is an identical criterion to that applied to the other sites I am satisfied that it has been subject to adequate consultation.

109. In the case of site EMP1, the policy specifies the location of the vehicle access in the criterion (Waterbrook Road) which reduces the flexibility available in respect of any planning application. **MM2** simplifies this by removing the named road. As regards sites CF2, VL4 and VL5, **MM64, MM161 and MM169** respectively clarify the access criteria; in respect of site RC2, **MM92** clarifies the highways requirement and **MM129 and 131** do the same in respect of site FM3. **MM105**, relating to site RC3, correctly deletes a (rather over-specific) requirement to retain an Armco barrier which in fact lies outside the district. Subject to these main modifications, the corresponding policy criteria are sound.

### ***Movement***

110. Most of the allocation policies contain a criterion which sees internal walking and cycle routes linked to existing external routes including the public right of way network. This is not a sound criterion for all sites, since many of the sites are small and will not have opportunities to provide walking and cycling routes or the potential to link into the public rights of way network. **MMs 5, 24, 35, 43, 55, 66, 73, 79, 91, 104, 114, 122, 130, 140, 148, 155, 163, 171, 180, 187, 194, 201, 208, 215, 221 and 228** simplify the criteria to seek an on-site movement layout suitable for all potential users, linked to existing external routes. In certain cases changes are made to make the criteria more site-specific, at sites HN1 (**MM24**), HN2 (**MM35**), LP1 (**MM43**), CF1 (**MM55**), RC1 (**MM79**) and RC2 (**MM91**). Unnecessary detail has been removed in the interests of clarification and flexibility, at sites EMP2 (**MM14**), RC3 (**MM104**) and FM3 (**MM130**). Subject to these main modifications, the corresponding policy criteria are sound.

### ***Public transport***

111. EMP1 (b) contains a criteria to 'consider' improving access to public transport, which is too imprecise to be sound. EMP 2 aims to 'enhance' bus facilities, which is again imprecise. These are not sound criteria. **MMs 4 and 13** delete these criteria because Policy CP31 of the JCS provides a clear framework for public transport provision. Nothing is lost by relying on the JCS policy.

### ***Landscape and rights of way***

112. **MM6** (EMP1), **MM25** (HN1), **MM36** (HN2) and **MM195** (VL8) simplify and clarify the landscape or open space requirements for these sites and are necessary and appropriate.
113. Policy RC1 contains an imprecise and unduly onerous criterion relating to a bridleway that would require the developer to make improvements to the local right of way network to compensate for 'any residual loss of amenity'. This would appear potentially to require work outside the developer's control and not directly relevant to the scheme. **MM80** simply seeks to retain and screen the bridleway within a semi-rural setting, which is a more appropriate, justified criterion.
114. In respect of site VL3, **MM156** retains a reference to the protection of key species and habitats, but takes out measures to protect trees and woodland. However, references to such measures are normally incorporated in development management policy documents and the forthcoming Local Plan Part III is likely to deal with these issues.

### ***Biodiversity and Special Protection Areas***

115. A criterion is included in the policies for the housing sites which seeks a biodiversity enhancement and mitigation scheme with 'appropriate mitigation'. In some cases this refers to specific species, such as the Bechstein's Bat, in some instances trees and woodland are mentioned, and in other cases a much briefer criterion is used; the plan therefore lacks consistency in this regard. A biodiversity enhancement and mitigation scheme will, by its nature, include mitigation measures, and since all species will be covered by the scheme there is no need to refer to any specific species by name. If an important or protected species is present it will receive no less protection through not being specifically named. **MMs 26, 37, 44, 57, 68, 74, 82, 93, 106, 123, 133, 143, 150, 156, 164, 172, 181, 188, 196, 202, 209, 216, 222 and 229** introduce a simple and consistent criterion for the provision of a biodiversity enhancement and mitigation scheme including measures to protect key species and habitats on site, and this is a sound approach.
116. In the case of site RC2, **MM93** contains an additional requirement in respect of the management, maintenance and improvement of the Oaklands Woodland Sites of Importance for Nature Conservation (SINCs). This is a more site specific and precise criterion than the rather vague reference to green infrastructure and trees in the submitted plan; the latter is appropriately deleted by **MM94** in order to make the policy sound.
117. Sites LP1, VL3, VL4 and VL6 are within 5km of the Wealden Heaths Phase II SPA and the policies contain lengthy criteria which all seek a screening assessment. **MM45, MM157, MM165 and MM182** respectively simplify the criteria and clarify that the requirement is for adequate measures to avoid or mitigate any adverse effects on the SPA. These modified criteria are succinct and relevant, and are sound. There is no need to put the words 'robust and effective' in as they do not add anything to the strength of the criteria. It is not appropriate to seek an investigation of in-combination effects for each site since this work has been carried out as part of the JCS (see paragraphs 23 to 27 of this report).

118. The requirement for a screening assessment in respect of VL5 is unnecessary as it is more than 5km from the SPA and the requirement is deleted by **MM173**.
119. RC1 RC2, RC3 have criteria relating to the Solent SPAs, SACs and Ramsar sites, but the mitigation requirements are by reference to the Solent Mitigation Strategy. However, it is not appropriate to seek, within a development plan policy, compliance by reference to an external non-examined strategy, and the relevant strategy might change during the life of the plan. **MM83, MM95 and MM107** remove the reference but retain the mitigation requirements and are sound. Removal of the reference from the policy does not signify any reduced commitment by the Council to the strategy.

### ***Flood risk and groundwater***

120. The site allocation policies all contain a lengthy requirement for a flood risk assessment with, in certain instances, additional reference to the aquifer and the avoidance of groundwater pollution. However, they are worded differently from two key policies in the JCS and in consequence they have the effect of diminishing rather than adding to clarity on the subject and undermining the plan's soundness. Flood risk is dealt with very clearly by JCS Policy CP25, which requires a site-specific flood risk assessment and relevant flood protection and drainage which will protect local communities and will normally be the responsibility of the developer. JCP Policy CP26 deals with water resources and water quality including the protection of groundwater. They provide an adequate level of protection in all cases and there is no need to repeat the requirements in the Allocations Plan. The criterion is therefore deleted by **MMs 7, 27, 38, 46, 58, 69, 75, 84, 85, 96, 97, 108, 109, 144, 151, 158, 166, 174, 183, 189, 197, 203, 210, 217, 223 and 230**. These modifications are sound and add to the clarity of the development plan as a whole.
121. In respect of site EMP1, **MM15** modifies the plan to replace an over prescriptive policy criterion concerning flood plain, surface water disposal and run off with a simplified requirement that the loss of floodplain should be fully compensated. This is appropriate.
122. In the case of sites HN1 and HN2, **MM28 and MM39** respectively add a clarification that development should not result in contamination of the aquifer or groundwater, including turbidity, this being a site specific issue. As regards sites FM1, FM2 and FM3, **MMs 116, 124 and 134** respectively include a replacement criterion requiring measures to prevent surface water from the site from discharging on to the adjacent highway, which reflects the planning permissions that have been granted for these sites. These modifications are all necessary for soundness.

### ***Sewerage***

123. Sites LP1, CF1, RC1, RC2, FM1, FM3, VL1, VL7 and VL9 contain a criterion to ensure adequate infrastructure is provided for sewerage on and off site. This is unnecessary because JCS Policy CP26(b) deals adequately with foul water drainage and sewage infrastructure and is appropriately deleted by **MMs 47, 59, 86, 98, 117, 135, 145, 190 and 204**.

### ***Land contamination and remediation***

124. Sites EMP1, HN1, LP1, RC1 and FM3 all contain a criterion which requires the investigation of the extent and type of any contamination on the site and the identification of any necessary mitigation measures. However, the wording is not sound because it does not actually require remediation should contamination be found. The wording in **MM29** (HN1), **MM49** (LP1) and **MM87** (RC1) requires that risks from land contamination are minimised through remediation works. This is a sound approach as it would entail investigatory work to ascertain the level of risk, followed by appropriate remediation. **MM8** removes the criterion altogether from site EMP1 because the Council considers that the issue is best covered by JCS Policy CP27, and this is appropriate. **MM136** removes the criterion altogether from site FM3 in order to reflect the terms of the planning permission that already exists for the site. These modifications are all required to make the plan sound.

### ***Energy Strategy***

125. All the allocation policies contain a criterion that requires the application of the 'principles of the Energy Strategy'. However, this strategy sits outside the development plan. It is not appropriate to seek, within a development plan policy, compliance by reference to an external non-examined strategy (see also paragraph 119). **MMs 9, 16, 31, 40, 50, 61, 70, 76, 88, 100, 110, 118, 125, 137, 146, 152, 159, 167, 176, 184, 191, 198, 208, 212, 218, 225 and 232** therefore delete this criterion from each of the policies in order to make the policies sound. JCS Policy CP24 contains a policy for sustainable construction which covers the relevant issue.

### ***Local employment and training agreement***

126. Sites EMP1, EMP2, HN1 LP1, CF1, RC2, FM1 and FM2 seek a local employment and training agreement prior to the commencement of development. This is unduly prescriptive and unnecessary since JCS Policy CP5 has a more general and positively-worded policy that indicates that planning permission will be granted for development that (among other things) improves workforce skills and employability and secures local skills and training provision. **MMs 10, 17, 32, 51, 62, 101, 119 and 126** respectively delete the criterion because JCS Policy CP5 can be relied on, and this is necessary for soundness.

### ***Heritage assets***

127. Sites HN1, CF1, VL5, VL10 and VL13 all contain a criterion which seeks the retention and management of important archaeological remains within and adjacent to the site in a manner appropriate to their significance. However, this is not an appropriate criterion because it over-simplifies the issue: these being development sites, retention may not always be possible. **MMs 30, 60, 175, 211 and 231** consequently slim down the criterion by simply requiring development to manage important archaeological remains within the site. Though terse, this is adequate because the subject is fully covered by JCS Policy CP30 (c) which addresses the conservation, enhancement, maintenance and management of the district's heritage assets and their settings, and was produced within the context of the advice in the National Planning Policy Framework. The JCS and section 12 of the Framework have far more detail

regarding the matters to be considered in evaluating development proposals in relation to heritage assets; there is no need to repeat their contents in the Allocations Plan and the level of protection is not reduced by the modifications.

128. In the case of sites RC2, FM1 and FM3, **MMs 99, 115 and 132** delete this criterion in order to reflect the terms of the planning permissions that have been granted on those sites. Were alternative developments to come forward, adequate protection is afforded by JCS Policy CP30 and the Framework.
129. Site RC1 contains a requirement to provide a heritage statement to assess development impact on the SAM of Rowlands Castle and demonstrate how impact has been taken into account. Site VL2 has a similar approach to the SAM and the Upper Farringdon Conservation Area. However, the main purpose of these policies should not be to seek a heritage statement in itself but to protect the SAM and the setting of the conservation area, and **MMs 81 and 149** respectively modify this part of the policies to reflect this requirement and make the policy sound.
130. VL1 similarly requires a heritage statement to assess the impact on the Bentworth Conservation Area, but again the main purpose of the policy should be to protect the conservation area and **MM 141 and 142** contain a more appropriate criterion which also addresses design and layout.

### Conclusion on the site policies

131. I consider that all the MMs are appropriate and necessary to make the plan sound and that the criteria are necessary in order to ensure the sites are properly developed in accordance with the JCS whilst limiting their environmental impact. Subject to the inclusion of these MMs, the plan is sound.

## Assessment of Legal Compliance

132. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The East Hampshire District Local Plan: Housing and Employment Allocations (the 'Allocations Plan') is identified within the approved LDS May 2015 which sets out an expected adoption date of January 2016. The Allocations Plan's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in January 2015 and consultation has been compliant with the requirements therein, including the consultation on

	the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The East Hampshire District Local Plan Housing and Employment Allocations HRA concludes that no significant effects on the European designated sites are likely, subject to its recommendations. Mitigation requirements have been incorporated into the Allocations Plan.
National Policy	The Allocations Plan complies with national policy except where modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The Allocations Plan complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

- 1. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.**
- 2. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the East Hampshire District Local Plan: Housing and Employment Allocations satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.**

*Jonathan Bore*

Inspector

This report is accompanied by the Appendix containing the Main Modifications

APPENDIX

Main Mod no.	Policy	Existing paragraph/ Policy Criterion	New paragraph/ Policy Criterion	Page number of Proposed Submission Plan	How the plan is modified.
MM1	EMP1			14	An overall site area of 9.4ha is allocated to accommodate about 7ha of employment land. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
MM2	EMP1	a	a	14	<del>provide vehicular access to the site; sign of vehicular priority access from Waterbrook Road;</del>
MM3	EMP1	b	b	14	<del>ensure any significant negative traffic impact is mitigated on the local road network; implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads;</del>
MM4	EMP1	c		14	<del>consider improving access to public transport;</del>
MM5	EMP1	d	c	14	<del>provide an on-site movement layout suitable for all potential users, linked to existing external routes including the Public Rights of Way network; include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</del>
MM6	EMP1	e	d	14	<del>provide landscaping and screening to minimise the impact of development on the setting of Alton; provision of appropriate landscaping and screening to minimise the impact of development on the setting of Alton and the surrounding area;</del>
MM7	EMP1	h		14	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>

MM8	EMP1	i		14	investigation of the extent and type of any contamination on the site and identify any necessary mitigation measures required;
MM9	EMP1	j		14	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council; and</del>
MM10	EMP1	k		14	provision of a local Employment and Training Agreement prior to the implementation of development.
MM11	EMP2			16	An overall site area of 3.55ha is allocated to accommodate about 3ha of employment land. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
MM12	EMP2	b		16	<u>ensure any significant negative traffic impact is mitigated on the local road network</u> <del>implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads;</del>
MM13	EMP2	c		16	enhance the bus facilities on Wilsom Road;
MM14	EMP2	e		16	maintain the footpath through Lynch Hill and retain the rural entrance to it;
MM15	EMP2	i	g	16	<u>fully compensate any loss of floodplain</u> <del>provision of a detailed Flood Risk Assessment, which should show that any loss of floodplain can be fully compensated. Details should also include a Surface Water Disposal Strategy. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;.</del>
MM16	EMP2	j		16	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council; and</del>
MM17	EMP2	k		16	provision of a local Employment and Training Agreement prior to the implementation of development.

<b>MM18</b>	<b>HN1</b>				<ul style="list-style-type: none"> <li>• a <del>extra care provision for the elderly</del> Care Village including independent living units and extra care provision for older people;</li> </ul>
<b>MM19</b>	<b>HN1</b>				<ul style="list-style-type: none"> <li>• a new 2FE primary school <u>and land for future expansion.</u></li> </ul>
<b>MM20</b>	<b>HN1</b>				The site will be developed in accordance with the following site specific <u>criteria</u> . Development shall:
<b>MM21</b>	<b>HN1</b>	c	c	21	<del>provision of</del> community facilities, including a <del>two form entry</del> primary school, community centre and convenience shop;
<b>MM22</b>	<b>HN1</b>	d	d	21	<u>provide vehicular access from Rowlands Castle Road to serve land north of that road only and access from the B2149 (Havant Road) to serve the remainder of the site;</u> <del>provision of vehicular access to all residential and employment areas of the site, including access from Rowlands Castle Road to serve land north of Rowlands Castle Road and access from the B2149 (Havant Road) to serve land north east and south west of Havant Road;</del>
<b>MM23</b>	<b>HN1</b>	e	e	21	<u>ensure any significant negative traffic impact is mitigated on the local and strategic road network;</u> <del>provision of measures to reduce the traffic impacts of the development on adjoining residential roads and improve accessibility by non-car transport modes including the provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network and provision over the A3(M) Junction 2, and the ability to service the site by public transport;</del>
<b>MM24</b>	<b>HN1</b>	f	f	21	<u>provide an on-site movement layout suitable for all potential users, linked to existing external routes including the Public Right of Way network, sion of new footpaths</u> <del>through the site to link with Horndean Village, Hazleton Common and the South Downs National Park;</del>

<b>MM25</b>	<b>HN1</b>	i	i	21	<del>provide new green infrastructure to connect with the wider network, and to improve the habitat connectivity between the adjoining SINC</del> <u>provide new green infrastructure to connect with the wider network, and to improve the habitat connectivity between the adjoining SINCs include appropriate green infrastructure provision creating connections to the wider green infrastructure network, including improving the habitat connectivity between the adjoining SINCs (Redcroft Row, Hazelton Common, Pyle Farm Meadow South and The Holt);</u>
<b>MM26</b>	<b>HN1</b>	j	j	21	<del>be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site;</del> <u>be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site;</u> <del>implement a Biodiversity Enhancement and Mitigation Scheme. This should include measures to protect key species and habitats including Bechstein Bats, woodland and mature trees on the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del> <u>implement a Biodiversity Enhancement and Mitigation Scheme. This should include measures to protect key species and habitats including Bechstein Bats, woodland and mature trees on the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</u>
<b>MM27</b>	<b>HN1</b>	k		21	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur and the site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place. Water should also be directed away from the most sensitive areas of the site identified in order to protect the aquifer;</del> <u>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur and the site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place. Water should also be directed away from the most sensitive areas of the site identified in order to protect the aquifer;</u>
<b>MM28</b>	<b>HN1</b>	l	k	21	<del>demonstrate that any development will not result in contamination of the aquifer or groundwater (including turbidity); as the site lies within groundwater source protection zone 1;</del> <u>demonstrate that any development will not result in contamination of the aquifer or groundwater (including turbidity); as the site lies within groundwater source protection zone 1;</u>
<b>MM29</b>	<b>HN1</b>	o	m	21	<del>investigation of the extent and type of ensure risks from land contamination are minimised, through remediation works; and on the site including any potential contamination from the adjacent historic landfill sites, to identify any necessary mitigation measures required;</del> <u>investigation of the extent and type of ensure risks from land contamination are minimised, through remediation works; and on the site including any potential contamination from the adjacent historic landfill sites, to identify any necessary mitigation measures required;</u>
<b>MM30</b>	<b>HN1</b>	p	n	21	<del>provide for the retention and careful management of any manage important archaeological remains; within and adjacent to the site, in a manner appropriate to their significance;</del> <u>provide for the retention and careful management of any manage important archaeological remains; within and adjacent to the site, in a manner appropriate to their significance;</u>

MM31	HN1	q		21	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council; and</del>
MM32	HN1	r		21	<del>provision of a local Employment and Training Agreement prior to the implementation of development.</del>
MM33	HN2				Land at Lovedean Lane is allocated for residential development for about 40 dwellings on 2.5ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
MM34	HN2	b	b	22	<del>ensure any significant negative traffic impact is mitigated on the local road network; implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads;</del>
MM35	HN2	c	c	22	<del>provide an on-site movement layout suitable for all potential users, linked to existing external routes including the Public Rights of Way network and the include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network including retention of and connection to the public footpath along the northern edge of the site;</del>
MM36	HN2	d	d	22	<del>provide semi-natural open space along the western boundary and strengthen links to the wider green infrastructure network; respond positively to the sensitive rural landscape character to the western boundary and strengthen the green infrastructure connections linking the wider area;</del>
MM37	HN2	e	e	22	<del>be supported by a</del> <u>implement a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site; and</u> <del>–This should include measures to minimise the impact of development on protected trees, including veteran tree and woodland and hedgerows. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>

<b>MM38</b>	<b>HN2</b>	f		22	provision of a detailed Flood Risk Assessment, which should include a Foul and Surface Water Disposal Strategy. Potential measures should be incorporated to address on and off-site drainage works and measures to prevent surface water from the site discharging onto the adjacent highway. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place. Water should also be directed away from the most sensitive areas of the site identified in order to protect the aquifer;
<b>MM39</b>	<b>HN2</b>	g	f	22	demonstrate that any development will not result in contamination of the aquifer or groundwater as the site lies within groundwater source protection zone 1; and (including turbidity).
<b>MM40</b>	<b>HN2</b>	h		22	ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.
<b>MM41</b>	<b>LP1</b>			24	Land at Lowsley Farm, south of the A3 is allocated for residential development for about 175 dwellings on 10.8ha. The site will be developed in accordance with the following site specific criteria: <u>Development shall:</u>
<b>MM42</b>	<b>LP1</b>	b	b	24	implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads and Longmoor Road; <u>ensure any significant negative traffic impact is mitigated on the local road network including Longmoor Road;</u>
<b>MM43</b>	<b>LP1</b>	c	c	24	include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network and provide an on-site movement layout suitable for all potential users, linked to existing external routes including the retain the public right Rights of Way network and retain its in an attractive semi-natural setting;

<b>MM44</b>	<b>LP1</b>	d	d	24	<del>implement a</del> be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site; <del>This should include measures to protect key species along the southern boundary and habitats on site including protected trees, including veteran tree and woodland. Where adverse impacts are unavoidable, appropriate mitigation will be required. Any biodiversity enhancements should take account of the Biodiversity Opportunity Area;</del>
<b>MM45</b>	<b>LP1</b>	e	e	24	<del>provide adequate measures to avoid or mitigate any adverse effects on</del> sion of a Screening Assessment as the site is within 5km of the Wealden Heaths Phase II SPA and could potentially have a significant impact on the ecological integrity of the <u>Special Protection Area</u> ; <del>The Assessment should ascertain whether the provision of adequate measures to avoid or mitigate any adverse effects is required;</del>
<b>MM46</b>	<b>LP1</b>	f		24	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur and the site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>
<b>MM47</b>	<b>LP1</b>	g		24	<del>ensure adequate infrastructure is provided for sewerage (on and off site);</del>
<b>MM48</b>	<b>LP1</b>	h	f	24	<del>provision of appropriate</del> noise mitigation measures including noise bunds and barriers, to reduce traffic noise from <u>the A3(M)</u> ; <u>and</u>

<b>MM49</b>	<b>LP1</b>	i	g	24	<u>ensure risks from land contamination are minimised, through remediation works. investigation of the extent and type of contamination on the site to identify any necessary mitigation measures required;</u>
<b>MM50</b>	<b>LP1</b>	j		24	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council; and</del>
<b>MM51</b>	<b>LP1</b>	k		24	<del>provision of a local Employment and Training Agreement prior to the implementation of development.</del>
<b>MM52</b>	<b>CF1</b>			28	Land at Down Farm is allocated for residential development for about 207 dwellings on 17.8ha. The site will be developed in accordance with the following site specific criteria- <u>Development shall:</u>
<b>MM54</b>	<b>CF1</b>	b	b	28	<u>ensure any significant negative traffic impact is mitigated on the local road network; implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads;</u>
<b>MM55</b>	<b>CF1</b>	c	c	28	<u>provide an on-site movement layout suitable for all potential users, linked to existing external routes including the existing cycle route running alongside the A3; include measures to improve accessibility by non-car modes, the ability to service the site by public transport and ensuring the connection of the site with existing cycle and pedestrian routes including connection to the existing cycle route running alongside the A3 and the Public Right of Way network;</u>
<b>MM57</b>	<b>CF1</b>	f	f	28	<u>implement a be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site;</u>

<b>MM58</b>	<b>CF1</b>	g		28	provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur and the site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place. Water should also be directed away from the most sensitive areas of the site identified in order to protect the aquifer;
<b>MM59</b>	<b>CF1</b>	h		28	ensure adequate infrastructure is provided for sewerage (on and off site);
<b>MM60</b>	<b>CF1</b>	j	h	28	<u>manage important archaeological remains within the site.</u> <del>provide for the retention and careful management of any important archaeological remains, within and adjacent to the site, in a manner appropriate to their significance;</del>
<b>MM61</b>	<b>CF1</b>	k		28	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council; and</del>
<b>MM62</b>	<b>CF1</b>	l		28	<del>provision of a local Employment and Training Agreement prior to the implementation of development.</del>
<b>MM63</b>	<b>CF2</b>			30	Land at Drift Road is allocated for residential development for about 11 dwellings on 0.6ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM64</b>	<b>CF2</b>	a	a	30	<del>provision of vehicular access to the site via a new access link forming a priority junction with Drift Road in the location of the existing driveway;</del>

<b>MM65</b>	<b>CF2</b>	b	b	30	<del>ensure any significant negative traffic impact is mitigated on the local road network</del> <del>implementation of appropriate measures to reduce the traffic impacts of the</del> <del>development on adjoining residential roads;</del>
<b>MM66</b>	<b>CF2</b>	c	c	30	<del>provide an on-site movement layout suitable for all potential users, linked to existing</del> <del>external routes; and</del> <del>include provision of internal walking and cycle routes linked to existing external</del> <del>routes including the Public Right of Way network;</del>
<b>MM67</b>	<b>CF2</b>	d		30	<del>provision of appropriate landscaping;</del>
<b>MM68</b>	<b>CF2</b>	e	d	30	<del>be supported by a</del> <del>implement a Biodiversity Enhancement and Mitigation Scheme</del> <del>and include measures to protect key species and habitats on site.;</del>
<b>MM69</b>	<b>CF2</b>	f		30	<del>provision of a detailed Flood Risk Assessment, which should include a Foul and</del> <del>Surface Water Disposal Strategy. The site should be attenuated to ensure that the</del> <del>run-off rate is no greater than the run-off prior to development taking place; and</del>
<b>MM70</b>	<b>CF2</b>	g		30	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven</del> <del>unfeasible or unviable to do so, working with the District Council.</del>
<b>MM71</b>	<b>CF3</b>			31	Land at Trafalgar Rise is allocated for residential development for about 18 dwellings on 0.7ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM72</b>	<b>CF3</b>	b	b	31	<del>ensure any significant negative traffic impact is mitigated on the local road network</del> <del>implementation of appropriate measures to reduce traffic impacts of the</del> <del>development on adjoining residential roads;</del>
<b>MM73</b>	<b>CF3</b>	c	c	31	<del>provide an on-site movement layout suitable for all potential users, linked to existing</del> <del>external routes including the Public Rights of Way network;</del> <del>include provision of internal walking and cycle routes linked to existing external</del> <del>routes including the Public Right of Way network;</del>

<b>MM74</b>	<b>CF3</b>	e	e	31	be supported by a <del>implement</del> a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site. <del>This should include measures to protect key species and habitats that use the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>
<b>MM75</b>	<b>CF3</b>	f		31	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place; and</del>
<b>MM76</b>	<b>CF3</b>	g		31	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM77</b>	<b>RC1</b>			32	Land at former Rowlands Castle Brickworks, The Drift is allocated for residential development for about 34 dwellings on 1.8ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM78</b>	<b>RC1</b>	b	b	32	<del>ensure any significant negative traffic impact is mitigated on the local road network; implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads;</del>
<b>MM79</b>	<b>RC1</b>	c	c	32	<del>include provision of internal walking and cycle routes linked to existing external routes provide an on-site movement layout suitable for all potential users, linked to existing external routes including the Public Rights of Way network and to the National Cycle Route 22;</del>
<b>MM80</b>	<b>RC1</b>	d	d	32	<del>retain and screen the bridleway within a semi-natural setting; Any residual loss of amenity is to be compensated for by improvements to the right of way network in the local area;</del>

<b>MM81</b>	<b>RC1</b>	e	e	32	<del>mitigate any adverse impact provision of a heritage statement to assess the impact of the development on the Scheduled Ancient Monument (SAM) of Rowland's Castle and the setting of the Conservation Area; and demonstrate how any impact has been taken into account and avoided or minimised within the proposals. Early consultation with English Heritage and Hampshire County Council's archaeology adviser would be advised;</del>
<b>MM82</b>	<b>RC1</b>	f	f	32	<del>Implement a</del> <u>be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to.</u> This should include measures to protect key species and habitats including Bechstein Bats, protected trees, including veteran tree and woodland. Where adverse impacts are unavoidable, appropriate mitigation will be required;
<b>MM83</b>	<b>RC1</b>	g	g	32	<del>provision of appropriate mitigation to address the impacts of recreational disturbance,</del> through in-combination effects of additional dwellings, on the Solent <u>Special Protection Areas (SPAs), Special Areas of Conservations (SACs) and Ramsar sites;</u> <u>and as set out in the Solent Mitigation Strategy;</u>
<b>MM84</b>	<b>RC1</b>	h		32	<del>provision of a detailed Flood Risk Assessment, including a Surface Water Disposal Strategy, to address any measures required to mitigate any potential impacts of groundwater and surface water flooding including avoiding built development in low lying areas. The site should also be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place. Water should also be directed away from the most sensitive areas of the site in order to protect the aquifer;</del>
<b>MM85</b>	<b>RC1</b>	i		32	<del>demonstrate that any development will not result in contamination of groundwater as the site lies within groundwater source protection zone 1;</del>

<b>MM86</b>	<b>RC1</b>	j		32	ensure adequate infrastructure is provided for sewerage (on and off site);
<b>MM87</b>	<b>RC1</b>	k	h	32	ensure risks from land contamination are minimised, through remediation works. investigation of the extent and type of contamination on the site to identify any necessary mitigation measures required; and
<b>MM88</b>	<b>RC1</b>	l		32	ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.
<b>MM89</b>	<b>RC2</b>			34	Land south of Oaklands is allocated for residential development for about 106 dwellings on 5.5ha. The site will be developed in accordance with the following site specific criteria. Development shall:
<b>MM90</b>	<b>RC2</b>	b	b	34	ensure any significant negative traffic impact is mitigated on the local road network; implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads;
<b>MM91</b>	<b>RC2</b>	c	c	34	provide an on-site movement layout suitable for all potential users, linked to existing external routes including the include provision of internal walking and cycle routes linked to existing external routes including the Public Rights of Way network, including access at both Redhill Road, and the B2148 and to the existing bridleway and Cycle Route 22 located to the east of the site;
<b>MM92</b>	<b>RC2</b>	d	d	34	improve the pedestrian footway and provide crossing facilities on the B2148 Whichers Gate Road and improve the pedestrian footway;

<b>MM93</b>	<b>RC2</b>	e	e	34	Be supported by <del>implement</del> a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site whilst managing, maintaining and enhancing the adjacent Oaklands Woodland SINC's; and which should include a plan to manage, maintain and enhance the adjacent Oaklands Woodland SINC's ecological integrity and interest. The Scheme should also include measures to protect key species and habitats including Bechstein Bats, hedgerows and mature trees. Where adverse impacts are unavoidable, appropriate mitigation will be required;
<b>MM94</b>	<b>RC2</b>	f		34	provision of a network of green infrastructure that integrates all existing trees (whether protected or not) with other vegetation on the site and its boundaries;
<b>MM95</b>	<b>RC2</b>	g	f	34	Provision of appropriate mitigation to address the impacts of recreational disturbance, through in-combination effects of additional dwellings, <u>on the Solent Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites.</u> <del>on the Solent SPAs, SACs and Ramsar sites as set out in the Solent Mitigation Strategy;</del>
<b>MM96</b>	<b>RC2</b>	h		34	provision of a detailed Flood Risk Assessment, including a Surface Water Disposal Strategy, to address any measures required to mitigate any potential impacts of groundwater and surface water including avoiding built development in low lying areas. The site should also be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place. Water should also be directed away from the most sensitive areas of the site identified in order to protect the aquifer;
<b>MM97</b>	<b>RC2</b>	i		34	demonstrate that any development will not result in contamination of groundwater as the site lies within groundwater source protection zone 1;
<b>MM98</b>	<b>RC2</b>	j		34	ensure adequate infrastructure is provided for sewerage (on and off site);

<b>MM99</b>	<b>RC2</b>	k		34	<del>provide for the retention and careful management of any important archaeological remains, within and adjacent to the site, in a manner appropriate to their significance;</del>
<b>MM100</b>	<b>RC2</b>	l		34	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council; and</del>
<b>MM101</b>	<b>RC2</b>	m		34	<del>provision of a local Employment and Training Agreement prior to the implementation of development.</del>
<b>MM102</b>	<b>RC3</b>			36	Land north of Bartons Road (Eastleigh House Cottages), Havant is allocated for residential development for about 17 dwellings on 0.6ha as an extension of proposed housing development in Havant Borough <del>to the south</del> . The site will be developed in accordance with the following site specific criteria: <u>Development shall:</u>
<b>MM103</b>	<b>RC3</b>	b	b	36	<del>ensure any significant negative traffic impact is mitigated on the local road network; implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads;</del>
<b>MM104</b>	<b>RC3</b>	c	c	36	<del>provide an on-site movement layout suitable for all potential users, include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network and provide a new pedestrian footpath along Bartons Road to connect the site to Wakefords Way West and improvements to the pedestrian crossing on Bartons Road;</del>
<b>MM105</b>	<b>RC3</b>	d		36	<del>retain the existing Armcø vehicle barrier which protects the railway embankment;</del>

<b>MM106</b>	<b>RC3</b>	e	d	36	<del>implement a</del> <u>be supported by a Biodiversity Enhancement and Mitigation Scheme and measures to protect key species and habitats on site, whilst providing an adequate wooded buffer to the adjoining SINC.</u> <del>This should include the provision of an adequate wooded buffer to the adjoining SINC and measures to protect key species and habitats including Bechstein Bats. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>
<b>MM107</b>	<b>RC3</b>	f	e	36	<del>provide</del> <u>provision of appropriate mitigation to address the impacts of recreational disturbance, through in-combination effects of additional dwellings, on the Solent Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites as set out in the Solent Mitigation Strategy; and</u>
<b>MM108</b>	<b>RC3</b>	g		36	<del>provision of a detailed Flood Risk Assessment, including a Surface Water Disposal Strategy, to address any measures required to mitigate any potential impacts of groundwater and surface water including avoiding built development in low lying areas. The site should also be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>
<b>MM109</b>	<b>RC3</b>	h		36	<del>demonstrate that any development will not result in contamination of groundwater as the site lies within groundwater source protection zone 1; and</del>
<b>MM110</b>	<b>RC3</b>	j		36	<del>developers should work with the District Council to ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so.</del>
<b>MM111</b>	<b>FM1</b>			38	Land at Lymington Farm is allocated for residential development for about 107 dwellings on 3.8ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>

<b>MM112</b>	<b>FM1</b>	b	b	38	implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads <u>ensure any significant negative traffic impact is mitigated on the local road network;</u>
<b>MM113</b>	<b>FM1</b>	c		38	<u>provide an assessment of the traffic implications at the nearby railway bridge;</u>
<b>MM114</b>	<b>FM1</b>	d	c	38	<u>provide an on-site movement layout suitable for all potential users, linked to existing external routes;</u> include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;
<b>MM115</b>	<b>FM1</b>	e		38	the implementation of a programme of archaeological work to establish a record of potential archaeological significance of the site;
<b>MM116</b>	<b>FM1</b>	g	e	38	<u>provide measures to prevent surface water from the site discharging onto the adjacent highway</u> <u>provision of a detailed Flood Risk Assessment, which should include a Foul and Surface Water Disposal Strategy. Potential measures should be incorporated to address on and off site drainage works and include measures to prevent surface water from the site discharging onto the adjacent highway. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</u> and
<b>MM117</b>	<b>FM1</b>	h	f	38	<u>ensure adequate infrastructure is provided for sewerage (on and off site);</u>
<b>MM118</b>	<b>FM1</b>	j		38	<u>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council; and</u>
<b>MM119</b>	<b>FM1</b>	k		38	<u>provision of a local Employment and Training Agreement prior to the implementation of development.</u>

<b>MM120</b>	<b>FM2</b>			40	Land at Friars Oak Farm in Medstead is allocated for residential development for about 79 dwellings on 3.9ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM121</b>	<b>FM2</b>		b		<u>ensure any significant negative traffic impact is mitigated on the local road network;</u>
<b>MM122</b>	<b>FM2</b>	c	d	40	<u>provide an on-site movement layout suitable for all potential users,</u> <del>include provision of internal walking and cycle routes</del> linked to existing external routes including the Public Rights of Way network;
<b>MM123</b>	<b>FM2</b>	d	e	40	<u>be supported by a</u> <del>implement</del> a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site; and
<b>MM124</b>	<b>FM2</b>	e	f	40	<u>provide measures to prevent surface water from the site discharging onto the adjacent highway.</u> <del>provision of a detailed Flood Risk Assessment, which should include a Foul and Surface Water Disposal Strategy. Potential measures should be incorporated to address on and off site drainage works and include measures to prevent surface water from the site discharging onto the adjacent highway. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>
<b>MM125</b>	<b>FM2</b>	f		40	<del>developers should work with the District Council to ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so; and</del>
<b>MM126</b>	<b>FM2</b>	g		40	<del>provision of a local Employment and Training Agreement prior to the implementation of development.</del>

<b>MM127</b>	<b>FM3</b>			41	Land North of Boyneswood Lane is allocated for residential development for about 51 dwellings on 3.64ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM128</b>	<b>FM3</b>	b	b	41	<del>ensure any significant negative traffic impact is mitigated on the local road network;</del> <del>implementation of appropriate measures to reduce the traffic impacts of the development on adjoining roads;</del>
<b>MM129</b>	<b>FM3</b>	c	c	41	<del>improve the highway between</del> improvement works to Boyneswood Lane and , <del>Boyneswood Lane between its junction with footway provision on site and its junction with Stoney Lane, and to Stoney Lane between its junction with Boyneswood Lane and its junction with Station Approach (unless suitable alternatives can be provided);</del>
<b>MM130</b>	<b>FM3</b>	d	d	41	<del>provide an on-site movement layout suitable for all potential users, linked to include provision of internal walking and cycle routes linked to existing external routes including the Public Rights of Way network; including the provision of a segregated pedestrian footway across the Boyneswood Road bridge;</del>
<b>MM131</b>	<b>FM4</b>		e		<del>provide a segregated footway across Boyneswood Road bridge;</del>
<b>MM132</b>	<b>FM3</b>	e		41	<del>the implementation of a programme of archaeological work to establish a record of potential archaeological significance of the site; and to identify any necessary mitigation measures required;</del>
<b>MM133</b>	<b>FM3</b>	f		41	<del>be supported by a</del> implement a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site; <del>– This should include measures to safeguard any protected species that use the site, minimise the impact of development on protected trees, including veteran tree and woodland and hedgerows. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>

<b>MM134</b>	<b>FM3</b>	h		41	<del>provide measures to prevent surface water from the site discharging onto the adjacent highway; and provision of a detailed Flood Risk Assessment, which should include a Foul and Surface Water Disposal Strategy. Potential measures should be incorporated to address on and off site drainage works and include measures to prevent surface water from the site discharging onto the adjacent highway. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>
<b>MM135</b>	<b>FM3</b>	i		41	<del>ensure adequate infrastructure is provided for sewerage, water supply and electricity (on and off site);</del>
<b>MM136</b>	<b>FM3</b>	j		41	<del>investigation of the extent and type of contamination on the site to identify any necessary mitigation measures required;</del>
<b>MM137</b>	<b>FM3</b>	l		41	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM138</b>	<b>VL1</b>			44	Land at Ashley Road in Bentworth is allocated for residential development for about 12 dwellings on 1.27ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM139</b>	<b>VL1</b>	b	b	44	<del>ensure any significant negative traffic impact is mitigated on the local road network; implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</del>
<b>MM140</b>	<b>VL1</b>	c	c	44	<del>provide an on-site movement layout suitable for all potential users, linked to existing external routes include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</del>
<b>MM141</b>	<b>VL1</b>	d	d	44	have a design and layout of high quality and a character which respects the characteristics of the village;

<b>MM142</b>	<b>VL1</b>	e	e	44	<del>mitigate any adverse impact on provision of a heritage statement to assess the impact of the development on the nearby Bentworth Conservation Area; and</del>
<b>MM143</b>	<b>VL1</b>	f	f	44	<del>be supported by a</del> <u>implement a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site.</u> <del>Any biodiversity enhancements should take account of the Biodiversity Opportunity Area;</del>
<b>MM144</b>	<b>VL1</b>	g		44	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur and the site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>
<b>MM145</b>	<b>VL1</b>	h		44	<del>ensure adequate infrastructure is provided for sewerage (on and off site); and</del>
<b>MM146</b>	<b>VL1</b>	i		44	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM147</b>	<b>VL2</b>			46	Land at Crows Lane in Upper Farringdon is allocated for residential development for about 8 dwellings on 0.6ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM148</b>	<b>VL2</b>	b	c	46	<del>provide an on-site movement layout suitable for all potential users, linked to existing external routes; include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</del>
<b>MM149</b>	<b>VL2</b>	d	e	46	<del>mitigate any adverse impact on the provision of a heritage statement to assess the impact of the development on the Scheduled Ancient Monument (SAM) and the setting of the nearby Upper Farringdon Conservation Area and demonstrate how any impact has been taken into account and avoided or minimised within the proposals;</del>

<b>MM150</b>	<b>VL2</b>	f	g	46	<del>be supported by a</del> <u>implement a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site.</u> <del>This should include measures to minimise the impact of development on existing woodland, mature trees and hedgerows within the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>
<b>MM151</b>	<b>VL2</b>	g		46	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur and the site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place; and</del>
<b>MM152</b>	<b>VL2</b>	h		46	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM153</b>	<b>VL3</b>			48	Land at Headley Nurseries in Headley is allocated for residential development for about 12 dwellings on 0.4ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM154</b>	<b>VL3</b>	b	b	48	<del>ensure any significant negative traffic impact is mitigated on the local road network</del> <u>implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</u>
<b>MM155</b>	<b>VL3</b>	c	c	48	<del>provide an on-site movement layout suitable for all potential users, linked to existing external routes;</del> <u>include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</u>
<b>MM156</b>	<b>VL3</b>	e	e	48	<del>Implement</del> <u>be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site.</u> <del>This should include measures to minimise the impact of development on existing woodland, mature trees and hedgerows within the site. Measures to protect key species and habitats should also be carried out. Where adverse impacts are unavoidable, appropriate mitigation will be required; and</del>

<b>MM157</b>	<b>VL3</b>	f	f	48	<del>provision</del> provide adequate measures to avoid or mitigate any adverse effects on <del>of a</del> Screening Assessment as the site lies within 5km of the Wealden Heaths Phase II Special Protection Area, and could potentially have a significant impact on the ecological integrity of the SPA. The Screening Assessment should ascertain whether the provision of adequate measures to avoid or mitigate any adverse effects is required;
<b>MM158</b>	<b>VL3</b>	g		48	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur and the site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place; and</del>
<b>MM159</b>	<b>VL3</b>	h		48	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM160</b>	<b>VL4</b>			50	Land at Headley Fields is allocated for residential development for about 7 dwellings on 0.97ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM161</b>	<b>VL4</b>	a	a	50	<del>provision of</del> provide vehicular access to the site from The Paddock and <u>include improvements</u> made to the standard of Headley Fields <del>to ensure that the link is suitable for use by all modes;</del>
<b>MM162</b>	<b>VL4</b>	b	b	50	<u>ensure any significant negative traffic impact is mitigated on the local road network;</u> <u>implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</u>
<b>MM163</b>	<b>VL4</b>	c	c	50	<u>provide an on-site movement layout compatible for all potential users include provision of internal walking and cycle routes</u> linked to existing external routes including the Public Rights of Way network;

<b>MM164</b>	<b>VL4</b>	e	e	50	<del>implement</del> <u>be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site; and. This should include measures to safeguard protected species that use the site and minimise the impact of development on the mature trees and hedgerow on the boundary of the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</u>
<b>MM165</b>	<b>VL4</b>	f	f	50	<del>provide adequate measures to avoid or mitigate any adverse effects on the sion of a Screening Assessment as the site lies within 5km of the Wealden Heaths Phase II Special Protection Area. and could potentially have a significant impact of the ecological integrity of the SPA. The Screening Assessment should ascertain whether the provision of adequate measures to avoid or mitigate any adverse effects is required;</del>
<b>MM166</b>	<b>VL4</b>	g		50	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. This site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place; and</del>
<b>MM167</b>	<b>VL4</b>	h		50	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM168</b>	<b>VL5</b>			52	Land adjacent to Linden, Fullers Road in Holt Pound is allocated for residential development for about 12 dwellings on 0.74ha. The site will be developed in accordance with the following site specific criteria, <u>Development shall:</u>
<b>MM169</b>	<b>VL5</b>	a	a	52	<del>Provision of a priority junction</del> <u>provide vehicular access without direct access and ensure any new direct access does not encroach on the visibility requirements of adjoining junctions in regular use onto the A325;</u>
<b>MM170</b>	<b>VL5</b>	b	b	52	<u>ensure any significant negative traffic impact is mitigated on the local road network including the A325;</u> <del>implementation of appropriate measures to reduce the traffic impacts of the development on adjoining residential roads;</del>

MM171	VL5	c	c	52	<del>provide an on-site movement layout suitable for all potential users, include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</del>
MM172	VL5	f	f	52	<del>Implement</del> <u>be supported by</u> a Biodiversity Enhancement and Mitigation Scheme <u>and include measures to protect key species and habitats on site;</u> <del>This should include measures to minimise the impact of development on of existing woodland, mature trees and hedgerows within the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>
MM173	VL5	h		52	<del>provision of a Screening Assessment as the site lies within 5km of the Wealden Heaths Phase II SPA and could potentially have a significant impact on the ecological integrity of the SPA. A Screening Assessment is therefore required to ascertain whether the provision of adequate measures to avoid or mitigate any adverse effects is required;</del>
MM174	VL5	i		52	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that built development is avoided in low lying areas where surface water flooding is more likely to occur and the site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>
MM175	VL5	k	i	52	<del>manage</del> <u>provide for the retention and careful management of any important archaeological remains, within and adjacent to the site, in a manner appropriate to their significance; and</u>
MM176	VL5	l		52	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>

<b>MM177</b>	<b>VL6</b>			54	Land adjacent to Stream Cottage, Fullers Road in Holt Pound is allocated for residential development for about 5 dwellings on 0.2ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM178</b>	<b>VL6</b>	a	a		<del>provision of vehicular</del> <u>provide</u> access to the site via Fullers Road; <del>implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</del>
<b>MM179</b>	<b>VL6</b>		b	54	<u>ensure any significant negative traffic impact is mitigated on the local road network;</u>
<b>MM180</b>	<b>VL6</b>	b	c	54	<u>provide an on-site movement layout suitable for all potential users, linked to existing external routes;</u> <del>include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</del>
<b>MM181</b>	<b>VL6</b>	d	e	54	<del>be supported by</del> <u>implement</u> a Biodiversity Enhancement and Mitigation Scheme <u>and include measures to protect key species and habitats on site; and</u> <del>This should include measures to minimise the impact of development on existing woodland, mature trees and hedgerows within the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>
<b>MM182</b>	<b>VL6</b>	e	f	54	<del>provide adequate measures to avoid or mitigate any adverse effects on the</del> <u>provision of a Screening Assessment as the site lies within 5km of the Wealden Heaths Phase II Special Protection Area. and could potentially have a significant impact on the ecological integrity of the SPA. The Assessment should ascertain whether the provision of adequate measures to avoid or mitigate any adverse effects is required;</u>
<b>MM183</b>	<b>VL6</b>	f	g	54	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in Flood Zone 3 and low lying areas. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place; and</del>

MM184	VL6	g		54	ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.
MM185	VL7			56	Land to the rear of Junipers in Medstead is allocated for residential development for about 12 dwellings on 0.8ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
MM186	VL7	b	b	56	<u>ensure any significant negative traffic impact is mitigated on the local road network;</u> <u>implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</u>
MM187	VL7	c	c	56	<u>provide an on-site movement layout suitable for all potential users, linked to existing external routes;</u> <u>include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</u>
MM188	VL7	e	e	56	<u>implement be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site; and. This should include measures to minimise the impact of development on existing woodland, mature trees and hedgerows within the site. Measures to protect key species and habitats should be carried out. Where adverse impacts are unavoidable, appropriate mitigation will be required;</u>
MM189	VL7	f		56	<u>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</u>
MM190	VL7	g		56	<u>ensure adequate infrastructure is provided for sewerage (on and off site);</u>

<b>MM191</b>	<b>VL7</b>	i		56	ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.
<b>MM192</b>	<b>VL8</b>			58	Land to the east of Cedar Stables in Medstead is allocated for residential development for about 10 dwellings on 1.3ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM193</b>	<b>VL8</b>	b	b	58	<u>ensure any significant negative traffic impact is mitigated on the local road network; implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</u>
<b>MM194</b>	<b>VL8</b>	c	c	58	<u>provide an on-site movement layout suitable for all potential users, linked to existing external routes include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</u>
<b>MM195</b>	<b>VL8</b>	e	e	58	<u>provide an area of open space the area of land to the north east of the site, (west of Trinity Hill) is to be retained as open space; and</u>
<b>MM196</b>	<b>VL8</b>	f	f	58	<u>implement a be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site. This should include measures to minimise the impact of development on existing woodland, mature trees and hedgerows within the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</u>
<b>MM197</b>	<b>VL8</b>	g		58	<u>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place; and</u>
<b>MM198</b>	<b>VL8</b>	h		58	ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.

<b>MM199</b>	<b>VL9</b>			59	Land north of Towngate Farm House in Medstead is allocated for residential development for about 4 dwellings on 0.5ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM200</b>	<b>VL9</b>	b	b	59	<del>ensure any significant negative traffic impact is mitigated on the local road network;</del> <del>implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</del>
<b>MM201</b>	<b>VL9</b>	c	c	59	<del>provide an on-site movement layout suitable for all potential users</del> <del>include provision of internal walking and cycle routes-linked to existing external routes including the Public Right of Way network;</del>
<b>MM202</b>	<b>VL9</b>	e	e	59	<del>implement</del> <u>be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site. This should include measures to retain the hedgerows bordering the site;</u>
<b>MM203</b>	<b>VL9</b>	f		59	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking;</del>
<b>MM204</b>	<b>VL9</b>	g		59	<del>ensure adequate infrastructure is provided for sewerage (on and off site); and</del>
<b>MM205</b>	<b>VL9</b>	h		59	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM206</b>	<b>VL10</b>			60	Land at adjacent to Bullfinches, Park Lane in Ropley is allocated for residential development for about 7 dwellings on 0.8ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>

MM207	VL10	b	b	60	ensure any significant negative traffic impact is mitigated on the local road network; <del>implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</del>
MM208	VL10	c	c	60	<del>provide an on-site movement layout suitable for all potential users include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</del>
MM209	VL10	e	e	60	<del>implement</del> <u>be supported by a Biodiversity Enhancement and Mitigation Scheme and</u> include measures to protect key species on site; and <del>– This should include measures to minimise the impact of development on existing woodland, mature trees and hedgerows within the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>
MM210	VL10	f		60	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>
MM211	VL10	g	f	60	<del>provide for the retention and careful management of any</del> <u>manage</u> important archaeological remains; within and adjacent to the site, in a manner appropriate to their significance; and <del>–</del>
MM212	VL10	h		60	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
MM213	VL11			61	Land at the corner of Dunsells Land and Gilbert Street in Ropley is allocated for residential development for about 15 dwellings on 0.69ha. The site will be developed in accordance with the following site specific criteria, <u>Development shall:</u>

<b>MM214</b>	<b>VL11</b>	b	b	61	ensure any significant negative traffic impact is mitigated on the local road network; <del>implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</del>
<b>MM215</b>	<b>VL11</b>	c	c	61	<del>provide an on-site movement layout suitable for all potential users, include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</del>
<b>MM216</b>	<b>VL11</b>	e	e	61	<del>implement</del> <u>be supported by</u> a Biodiversity Enhancement and Mitigation Scheme <u>and</u> include measures to protect key species and habitats on site. <del>This should include measures to minimise the impact of development on existing woodland, mature trees and hedgerows within the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>
<b>MM217</b>	<b>VL11</b>	f		61	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place; and</del>
<b>MM218</b>	<b>VL11</b>	g		61	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM219</b>	<b>VL12</b>			62	Land off Hale Close in Ropley is allocated for residential development for about 5 dwellings on 0.2ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM220</b>	<b>VL12</b>	b	b	62	<del>ensure any significant negative traffic impact is mitigated on the local road network; implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</del>

<b>MM221</b>	<b>VL12</b>	c	c	62	<u>provide an on-site movement layout suitable for all potential users, linked to existing external routes</u> <del>include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</del>
<b>MM222</b>	<b>VL12</b>	e	e	62	<del>be supported by</del> <u>implement a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site; and</u>
<b>MM223</b>	<b>VL12</b>	f		62	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur. The site should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>
<b>MM224</b>	<b>VL12</b>	g	f	62	<del>re-provide relocation of the existing allotments within the village.;</del>
<b>MM225</b>	<b>VL12</b>	h		62	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM226</b>	<b>VL13</b>			63	Land southwest of Dean Cottage is allocated for residential development for about 15 dwellings on 0.95ha. The site will be developed in accordance with the following site specific criteria. <u>Development shall:</u>
<b>MM227</b>	<b>VL13</b>	b	b	63	<u>ensure any significant negative traffic impact is mitigated on the local road network;</u> <del>implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</del>
<b>MM228</b>	<b>VL13</b>	d	d	63	<u>provide an on-site movement layout suitable for all potential users, linked to existing external routes;</u> <del>include provision of internal walking and cycle routes linked to existing external routes including the Public Right of Way network;</del>

<b>MM229</b>	<b>VL13</b>	f	f	63	<del>implement</del> <u>be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site; and.</u> <del>This should include measures to minimise the impact of development on mature trees (some TPOs) forming part of existing hedgerows bordering the site. Where adverse impacts are unavoidable, appropriate mitigation will be required;</del>
<b>MM230</b>	<b>VL13</b>	g		63	<del>provision of a detailed Flood Risk Assessment, which should include a Surface Water Disposal Strategy. Potential measures should be incorporated to ensure that any built development is avoided in low lying areas where surface water flooding is more likely to occur. The shite should be attenuated to ensure that the run-off rate is no greater than the run-off prior to development taking place;</del>
<b>MM231</b>	<b>VL13</b>	h	g	63	<del>provide for the retention and careful management of any important archaeological remains, within and adjacent to the site, in a manner appropriate to their significance; and.</del>
<b>MM232</b>	<b>VL13</b>	i		63	<del>ensure that the principles of the Energy Strategy are applied unless it can be proven unfeasible or unviable to do so, working with the District Council.</del>
<b>MM233</b>	<b>VL2</b>	a	b	46	<u>ensure any significant negative traffic impact is mitigated on the local road network;</u> <del>implementation of appropriate measures to reduce traffic impacts of the development on adjoining residential roads;</del>