

Post Adoption Consultation Statement



Housing Outside Settlement Boundaries SPD adopted 23 March 2023

Comments were invited on the Draft Supplementary Planning Document, for six-weeks from Tuesday 9 August 2022 to 5pm Tuesday 20 September 2022.

The Council notified those who had registered with the Council as having an interest in Planning, as well as Statutory Bodies and Local Government Organisations.

Copies of the Consultation Draft SPD, the Strategic Environmental Assessment and Habitats Regulations Assessment Screening and Equalities Impact Assessment Screening were available to view/download on the Council's website at:

<http://www.easthants.gov.uk/planning-policy/consultation>. Comments could be submitted using the online consultation portal, <https://easthants.oc2.uk/>

In addition, paper copies were available for inspection at the following places within East Hampshire District:

East Hampshire District Council
Penns Place,
Petersfield
GU31 4EX

Monday - Friday
09:00 – 17:00

Horndean Parish Office,
Jubille Hall,
Crouch Lane,
Horndean, Waterlooville PO8 9SU

Monday to Thursday 08:30-4:30pm
Friday 08:30 – 4pm

Alton Library
Vicarage Hill
Alton
GU34 1HT
Monday 9:30am – 1:30pm
Tuesday 9:30 am – 5pm
Thursday 9:30am – 5 pm
Friday 9:30am – 5 pm
Saturday 9:30am – 5pm

Bordon Library
Forest Centre
Pinehill Road
Bordon
GU35 0TN
Monday 9:30am – 5pm
Tuesday 9:30 am – 5pm
Thursday 9:30am – 5 pm
Saturday 9:30am – 1:30pm

Liphook Library
London Road
Liphook
GU30 7AN
Wednesday 9:30am – 1:30pm
Friday 9:30am – 1:30pm
Saturday 9:30am – 1:30pm

A public notice was also placed in the local press, to raise awareness of the consultation. The following sets out a summary of all the responses received, together with the Council's response and if a change was recommended to the SPD.

Comments are listed under the headings of :

- General comments - to include comments on the SPD, 5 year land supply, settlement boundaries, national planning policy and sustainable development.
- Introduction and Background;
- Criteria 1;
- Criteria 2;
- Criteria 3;
- Criteria 4.

Respondent	Summary of Representation	Officer Comment and Recommended Action
General comments		
Chapman Lily Planning on behalf of Hurlock Investments Ltd.	The SPD should identify land for additional housing outside of settlement boundaries. The council published in Dec 2018 Settlement Policy Boundary Review : Interim Methodology, which considered all settlements and numerous sites and could be now used to identify sites for release. NPPF (para 78) refers to being responsive to local circumstances and supporting housing developments to reflect local needs, including reference to identify villages to grow and thrive (para 79). The SPD does not add meaningful interpretation that might help deliver local housing need. The wording of CP10 does not require all four considerations to be met and this needs to be reflected in the SPD.	<p>It is not the purpose of the SPD to allocate additional sites, its purpose is to simply expand and explain the criteria in Policy CP10. The Dec 2018 Settlement Policy Boundary Review document was prepared to inform the emerging local plan at that time and will require updating as part of the evidence base.</p> <p>The expression of CP10 does require all four elements to be met, the four bullets list matters that must be addressed for a proposal to be considered positively under this part of the policy.</p>
Historic England	No comment.	Noted
Highways England	Any sites coming forward in close proximity to the strategic highway network / A3 may require a transport assessment.	Noted
Bell Cornwall on behalf of Glen House Estates Ltd	The SPD should be far more proactive towards development whilst keeping within the constraints of these 4 bullet points. The SPD should inform prospective developers about where and what may be acceptable within the countryside.	It is not the purpose of the SPD to identify sites or locations where the SPD criteria would apply, that would be introducing new policy which goes beyond the remit of an SPD.
Various individuals	Support comments submitted by SMASH and Medstead and Four Marks Neighbourhood Planning Team.	Noted

Respondent	Summary of Representation	Officer Comment and Recommended Action
	Presence of the SDNP occupying so much of the central part the EHDC area puts additional pressure on the areas outside the Park and adequate allowances need to be made for this	
Individual	The Green Infrastructure Strategy has many good points that need taking into consideration when determining housing sites outside settlement boundaries. We need a holistic approach to assess sites and appreciation of interactions between current and future physical factors and new housing on the natural environment and how it functions ecologically	Noted
Individual	<p>The allocation of villages suitable for more development is flawed, many of these villages do not meet the sequential conditions of the “Settlement Hierarchy” background paper.</p> <p>This level of complicity extends to the identification of “settlement boundaries” of villages, where local pressure groups or influential individuals are able to confound the reasonable and logical allocation of land suitable for development by arbitrarily restricting the boundary.</p>	<p>It is not the purpose of the SPD to allocate additional sites, its purpose is to simply expand and explain the criteria in Policy CP10.</p> <p>The Settlement Hierarchy paper referred to is in the process of being updated to inform the emerging local plan.</p>
Rowlands Castle PC	<p>Para 2.1 should also refer to saved policies TM3 and H7.</p> <p>Para 2.3 the online map does not include a settlement boundary around a new housing development the SPD must designate boundaries</p>	<p>Agree the SPD should include reference to saved Policy H7, which advocates subdivision of properties in the countryside. Do not agree Policy TM3 should be referenced as this relates to visitor accommodation.</p> <p>Recommended Change :</p>

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	<p>around new developments and those sites that have planning permission.</p> <p>In order to control where any developments could place outside Settlement Policy Boundaries, this section should also contain the following condition that was specified in paragraph 5.4 of the EHDC 'Interim Housing Policy Statement (IHPS)' in early 2014. 'Sites should be in sustainable locations, adjacent to existing settlements defined by a Settlement Policy Boundary, as these settlements generally have facilities likely to be needed by new residents. They should also be acceptable in all other respects, e.g. highways access, no flood risk and contribute to affordable housing'.</p>	<p>Insert reference to Policy H7 under the section covering the Local Plan : Second Review, to read “ <u>Policy H7 allows for the sub-division of properties in the countryside</u>’.</p> <p>It is not the purpose of the SPD to define boundaries around new development, its purpose is to simply expand and explain the criteria in Policy CP10.</p> <p>The Interim Housing Policy Statement was introduced prior to adoption of the Core Strategy and Policy CP10 and therefore was superceded by CP10 which covers settlements both with and without a settlement policy boundary.</p>
SMASH (South Medstead Against Speculative Housing)	<p>SMASH supports sustainable housing development, based on:</p> <ul style="list-style-type: none"> · actual housing need, tenure, and type within an area, · maintaining and reinforcing the role and function of the settlement(s) and not overwhelming it, · not adversely impacting the local rural road network contrary to the goals of EHDC, regarding the climate emergency, reducing vehicle emissions in particular · enhancing the biodiversity of the location and minimising loss of green/agricultural fields. 	<p>Support noted.</p> <p>The purpose of the SPD is to expand and explain the criteria in Policy CP10, which always included reference to ‘housing and other small scale development outside settlement policy boundaries will only be permitted where,,,’ it does not introduce new requirements.</p>

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	<p>Speculative applications outside a settlement boundary have not had the same level of scrutiny as those in adopted documents nor approval by the appropriate parties and therefore should be discouraged.</p> <p>Speculative development outside settlement boundaries is no replacement for controlled, evidence-based planning decisions.</p>	
Individual	Land at Highwood Beech is available for development	Noted
Individual	Disappointed EHDC are ready to approve developments outside boundaries which we have worked hard to determine and apply. To achieve an additional 175 in Four Marks and Medstead is unrealistic.	Policy CP10 refers to 175 in Four Marks and Medstead but that has already been delivered through various planning permissions, the SPD does not give additional quantum's to be developed, that is not its purpose.
Individual	Fully support need to expand the 4 tests in CP10 as they are too broad and open to interpretation.	Noted.
Grayshott PC	Support the SPD	Support welcome
Metis Homes	Welcome SPD but make suggestions to improve effectiveness of the SPD	Noted - the suggestions on the individual criteria of the SPD are covered under their respective sections below.
Herriard Estates	<p>There is a need for more houses in all settlements to maintain community viability and services otherwise they will become retirement areas with no services. The four categories are all reasonable but difficult if not impossible to achieve as a package there needs to be alternatives.</p> <p>All rural settlements can find space to growth 5% in a 10 year period and this should be encouraged.</p>	Comment noted
Individual	No more housing in Lovedean.	Noted

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Waverley Borough Council	No comments to make.	Noted
Pro Vision on behalf of Herriard Estates	Our client supports the provision within Policy CP10 for the development of some housing in rural areas outside of the settlement policy boundaries but the guidance should not introduce new requirements which are so onerous they prevent development coming forward, particularly in areas which are not overly sensitive or constrained.	Comment noted – the purpose of the SPD is to expand and explain the criteria in Policy CP10, it does not introduce new requirements.
National Trust	<p>Welcome the additional guidance, but are concerned that unplanned erosion of the countryside may have a significant adverse impact on the special features and character of the countryside.</p> <p>Wording within the SPD could be strengthened to re-affirm policy wording within Policy CP10 Spatial Strategy for Housing, that states <i>‘Housing should be accommodated through development and redevelopment opportunities within existing settlement policy boundaries in the first instance’</i> this will help ensure the countryside is protected and supports development coming forward in line with the NPPF.</p>	There is no need to repeat the other elements of CP10, the SPD is clear in its intention to clarify the four criteria specifically referred to.
Thakeham Homes Ltd	As the Council is not able to demonstrate a five year housing land supply, and in accordance with NPPF Paragraph 11d the relevant development plan policies (such as CP10 of the JCS) are out of date. It therefore follows that that this draft SPD which is wholly based on that Policy is also out of date. The presumption in favour of sustainable development will	<p>The current situation is that the Council is unable to demonstrate a 5 year supply of land for housing. This position therefore triggers the application of the tilted balance. (para 11d NPPF).</p> <p>This means that the policies which give rise to an “in principle” objection to proposed development</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>apply. Rather than seeking to adopt an SPD based on an out of date policy, the Council should be doing more to proactively address the shortfall of housing and assist the delivery of much needed new housing in the District - the draft SPD will not assist in the delivery of new homes.</p>	<p>schemes outside of defined boundaries notably CP2, CP10 and CP19 of JCS will be treated as “out of date” and the presumption in favour of sustainable development will apply.</p> <p>The SPD will however, provide guidance in the interim whilst a new local plan is being prepared.</p>
<p>CPRE (Hampshire, South Downs & Central Planning Group)</p>	<p>support the objective and terms of the SPD, Policy CP10 in the current Local Plan, makes clear the very limited circumstance in which development outside Settlement Policy Boundaries will be approved. It emphasises the need for community support and lack of available space within the urban area, principles strongly supported by CPRE for development within the countryside. Further, the policy accords with the principle of permitting development only in the more sustainable locations, and where there is an established need.</p>	<p>Noted</p>
<p>Critchley Architects</p>	<p>Strongly support such an initiative, it has been clear to us that there are many residential clusters outside the Settlement Policy Areas, which could be further developed, without imposing on the wider countryside, and without overloading the existing infrastructure.</p>	<p>Noted</p>
<p>Individual</p>	<p>Request the criteria are extended to cover holiday lets and to also allow for static caravan parks outside settlement boundaries to ease pressure on the local housing provision.</p>	<p>Policy CP10 simply covers housing and providing homes for the district changing population. Other policies cover commercial activities.</p>
<p>DHA Planning on behalf of Bellway</p>	<p>It is clear that the Council require an interim strategy for the delivery of housing in the district, prior to the</p>	<p>Whilst the SPD does not form part of the development plan it will be a material planning consideration when</p>

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Strategic Land and Countryside Partnerships PLC	adoption of the emerging Local Plan in recognition of the dwindling supply of available sites within settlements which are suitable for housing and the implications of this on housing supply and delivery. The introduction of this document does not represent a material change in policy or how it will be interpreted, as the SPD does not form part of the development plan.	adopted and be able to apply to developments that may be appropriate to support the provision of new housing.
Abri	Opportunities to deliver new sustainable housing to meet community needs should be supported wherever these arise, this can be achieved in a variety of ways including the intensification of land outside settlement boundaries to deliver more affordable housing. The guidance should include more direct reference to the intensification of residential areas outside of defined boundaries.	The SPD recognises that small scale infill development within an existing cluster of dwellings may also be appropriate, but it must be noted that this is in the context of satisfactory responses being received to all four criteria of this part of CP10.
Hartley Park Farms	Policy CP10 is currently unfit for purpose. The policy needs to be further refined to allow more strategic and worthwhile developments to take place such as, where there are unused or derelict building outside the boundary, to allow these to be developed as opposed to letting properties deteriorate and become and eye sore.	Strategic allocations are part of the plan making process and not within the remit of an SPD. Consideration of brownfield sites will form part of the local plan assessment exploring options for new allocations.
Medstead and Four Marks Neighbourhood Plan Steering Group	Welcome the SPD- the most sustainable development is development that is consistent with the statutory development plan. Settlement boundaries have been defined in the Medstead Village Settlement Policy Boundary, South Medstead Settlement Policy Boundary and Four	Whilst Neighbourhood Plans can define settlement boundaries and allocate sites, the current situation is that the Council is unable to demonstrate a 5 year supply of land for housing. This position therefore triggers the application of the tilted balance. (para 11d NPPF).

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	<p>Marks Settlement Policy Boundary – as designated in the Neighbourhood Plan and carry full weight in the determination of planning applications.</p> <p>Seek clarification that the boundaries referred to (para 2.3) are the same as those in the Neighbourhood Plan made in May 2016 and these carry full weight until they are superceded by the next made plan.</p>	<p>This means that the policies which give rise to an “in principle” objection to proposed development schemes outside of defined boundaries notably CP2, CP10 and CP19 of JCS will be treated as “out of date” and the presumption in favour of sustainable development will apply.</p> <p>Furthermore, para 14 of NPPF specifically refers to Neighbourhood Plans and expresses four criteria all of which must be met to enable a judgement to be made as to whether the harm associated with the development proposed “significantly and demonstrably” outweighs its benefit.</p> <p>So in terms of a Neighbourhood Plan this means:</p> <ul style="list-style-type: none"> - The Neighbourhood plan became part of the development plan 2 years or less before the date on which the decision was made - The neighbourhood plan contains policies and allocations to meet its identified housing requirement - The LPA has at least 3 year supply - The LPA housing delivery test was at least 45% of that required over the previous 3 years. <p>In terms of the Medstead and Four Marks Neighbourhood Plan, this is more than two years old, did not allocate sites for development and consequently does not benefit from the protection of para 14 as all elements of para 14 must apply.</p>

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		<p>Therefore both para 11d and 14 of NPPF will play part of any considerations if applications are received outside of the defined settlement boundaries in addition to the criteria set out in this SPD.</p> <p>However, despite the above, in regards to the SPD, the most recent settlement policy boundaries are applicable, which are those established by the M&FM Neighbourhood Plan (2016).</p>
LRM Planning on behalf of Hallam Land Management Ltd	Welcome the SPD to clarify Policy CP10.	Noted
Worldham PC	Largely support the SPD, but seek clarification if Worldham still has a settlement boundary and for those parts of the settlement outside the boundary can these be listed as tier 6 in the settlement hierarchy.	Although a large proportion of Worldham parish falls within the EH's planning area, the remainder is within the National Park. Neither East or West Worldham settlements fall in EHDC planning area and are therefore not listed in the EHDC revised settlement hierarchy as presented in Appendix 1 of the SPD.
Individual	Object to 700 more houses at Alton	Policy CP10 sets out the development strategy for the District over the plan period 2011 – 2028 the 700 dwellings referred to have already been planned for and the majority delivered.
Individual	This is too general for the public to agree to its contents – we need to know where the development is to be located.	The purpose of the SPD is to simply expand and explain the criteria in Policy CP10, it does not allocate sites for development.
Barton Willmore (Stantec) on	The final paragraph of CP10 is essentially an exception policy: it provides for the grant of housing	This part of CP10 does indeed set out where further development may be suitable in addition to sites

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behalf of Reside Developments Ltd.	<p>and other small scale development schemes where the four criteria are met. The SPD will not carry the same weight as an adopted ‘up to date’ development plan and will ultimately be tested at appeal depending on whether para 11 of NPPF is triggered – presumption in favour of sustainable development given the local plan is more than 5 years old and lack of 5 year land supply.</p> <p>Further comments:</p> <ul style="list-style-type: none"> • The SPD should not seek to introduce new criteria or new policy as to the application of the ‘four exceptions’ at CP10. • It is helpful that the Council points to the evidence base documents that it considers are relevant to the exception tests. These have not been the subject of examination. • the Council may wish to consider the relationship of the preceding three exception tests to the definition of sustainable development as per para 14 of the NPPF. 	<p>either allocated or within existing settlement boundaries.</p> <p>Application of the criteria in CP10 and 5 year land supply are separate issues.</p> <p>The SPD will not carry the same weight as an adopted ‘up to date’ development plan and progress is being made with a new local plan for East Hampshire, however it will be sometime before the emerging local plan carries any weight (Regulation 19) which is currently anticipated to be published April/May 2024. Hence the reason for preparing the SPD in the meantime to add clarity to CP10 criteria. It is not considered that the SPD introduces new policy.</p> <p>Para 14 only applies to those settlements with made neighbourhood plans and comes into effect with a lack of 5 year land supply, linked with the titled balance under 11d.</p>
Individual	Do not allow any further development in Standford.	Noted
Transport for London	No comment	Noted
Advoco Planning	Collectively this policy framework is highly restrictive more so than Metropolitan Green Belt as it excludes infilling and conversion of buildings in the countryside to dwellings. No real explanation is provided to explain why the policies are so restrictive and it	The SPS simply explains the policy framework of adopted planning policy. Policy CP14 covers affordable housing in for rural communities and policy CP19 refers to development within the countryside

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	<p>cannot be to do with sustainability of location. Specifically, a site on the edge but outside of a settlement (with a SPB) will have the same or similar sustainability attributes as a site just inside the same SPB. In addition, if a location is inherently unsustainable (i.e. remote in NPPF terms) an application could be refused on that basis alone. In its current form, Policy CP10 is dysfunctional, there is no evidence to suggest that the absence of guidance has limited the supply of rural housing. The proposed SPD is considered to be unnecessarily complex and removes much of the community based decision making principles which it is designed to promote. Policy CP10 needs to be reactive and respond to local needs and ambitions as they arise.</p>	<p>being permitted if it has a need for a countryside location.</p> <p>Preparation of a new local plan will provide the opportunity to formulate a development strategy that reflects current opportunities and challenges, that is not the purpose of the SPD.</p>
Falcon Developments	<p>The SPD is not explicit enough in its intentions and therefore the 4 tests proposed are 'light touch' extensions of the existing CP10 strategy. On this basis the adoption of this SPD as written, does not materially impact the decision making process for Planning Officers at the Council or for the applicants submitting schemes on unallocated landholdings.</p>	<p>The SPD attempts to provide proactive guidance as to how the criteria of CP10 should be applied – the tests already exist and do not change as a result of the SPD.</p>
Luken Beck on behalf of Bloor Homes Ltd.	<p>The Council's objective with this SPD should be to set out a clear road map for decision making in meeting its housing requirements in the event it cannot demonstrate a 5-year housing land supply. Instead, the SPD confirms it seeks to expand solely on the operation of policy CP10 which, to our knowledge, has not successfully delivered any sites via its</p>	<p>Application of the criteria in CP10 and 5 year land supply are separate issues.</p> <p>The SPD does not create additional policy requirements, it explains the criteria and includes how this could be applied to proposals for suitable development.</p>

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	<p>exceptions criteria since the Joint Core Strategy's adoption in 2014. The use of the SPD as proposed would be procedurally confusing in practice, and it would add onerous policy and resource burdens to schemes coming forward outside of settlement boundaries.</p> <p>The SPD expands upon the four exceptional criteria 'tests' in CP10 and creates additional policy requirements to negotiate and agree pre-application engagement processes and document robust evidence (including alternatives) for development to be accepted outside settlement boundaries. The more arduous requirements suggested within the SPD would be in conflict with the SCI and would place an additional blanket process burden on applicants.</p> <p>As noted, Policy CP10 and the SPD would not align with Para. 11 of the NPPF. Whilst the SPD is intended to assist in land coming forward for development outside of settlement boundaries the tilted balance assessment for decision making would take precedence.</p>	<p>The SCI sets out both statutory and additional publicity requirements. Given the nature of the SDP in considering proposals outside settlements boundaries which would be considered as an exception to adopted policy, the Council does not consider the matters expressed under criterion 4 are excessive – see Recommended changes below to reflect this point.</p> <p>In terms of reference to the tilted balance this will only come into play if the Council cannot demonstrate a 5 year supply of housing land. Therefore the SPD does not change the situation when Para 11 of NPPF would be triggered.</p>
<p>Planning Agent on behalf of land owner Lindford Road, Lindford</p>	<p>The SPD presents an opportunity to update the Joint Wealden Heaths Phase II Special Protection Area SPD, to enable the District Council to revisit the permissible number of net new dwellings within 400 metres of the SPA in response to the scaling back of the strategic site allocation at Whitehill & Bordon.</p>	<p>The purpose of the SPD is to provide additional guidance for Policy CP10 and is not connected with the Joint Wealden Heaths Phase II Special Protection Area SPD which supplements Policies CP14, 15 and 22.</p>

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	There is also a pressing need for the LPA to provide for corresponding demand for self and custom build housing in areas influenced by the 400 metre SPA buffer. The site promoted represents the only logical site within Lindford parish area on which suitable scheme of self and custom build housing could be accommodated.	This SPD will not override the requirements of the SPA.
Voller Architectural on behalf of owners of a site in Beech	Request the inclusion of garden land within the settlement policy boundary in Beech.	This SPD does not amend settlement policy boundaries.
Solve Planning on behalf of Helios Property Ltd.	The SPD is seeking to introduce new policy contrary to the NPPF.	It is not considered that the SPD introduces new policy.
M7 Planning	Support the general direction of Policy CP10 and strongly agree that new development opportunities should be prioritised either within or close to large sustainable existing settlements. Support the clear identification of Alton in this policy wording, in accordance with its Settlement Hierarchy position as a Tier 1 settlement in which housing development should be accommodated as a priority to meet growth in housing need. Owing to dated nature of the adopted Local Plan, consider that the housing need figures for East Hampshire currently presented under Policy CP10 are artificially low and the local plan should be reviewed. – promote land available for development in Alton.	<p>The SPD makes no specific reference to Alton and only refers to settlements in so far as quoting CP10 in full where the spatial development strategy for the district is expressed. The settlement hierarchy is referenced in the SPD which lists Alton as a tier 1 settlement.</p> <p>Progress is being made with a new local plan for East Hampshire, which will include updated housing needs figures and a revised development strategy in due course.</p>

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CPRE Hampshire	Support the objective and terms of the SPD, which makes clear the very limited circumstance in which development outside Settlement Policy Boundaries will be approved. It emphasises the need for community support and lack of available space within the urban area, principles strongly supported by CPRE for development within the countryside.	Noted
Individual	housing should be found through large developments, where difficulties can be overcome, not through small developments outside existing Village Plans which raise many difficulties.	Noted
Four Marks PC	(SPD) places emphasis on the importance of existing policies in 'made' plans, which is advocated by the Parish Council. Settlement Policy Boundaries identified need to be consistent with those within the existing Medstead and Four Marks Neighbourhood Plan. Parish Council are fully supportive of sustainable development, providing it is consistent with the development plan, and the appropriate infrastructure is in place to support it.	<p>Whilst Neighbourhood Plans can define settlement boundaries and allocate sites, the current situation is that the Council is unable to demonstrate a 5 year supply of land for housing. This position therefore triggers the application of the tilted balance. (para 11d NPPF).</p> <p>This means that the policies which give rise to an "in principle" objection to proposed development schemes outside of defined boundaries notably CP2, CP10 and CP19 of JCS will be treated as "out of date" and the presumption in favour of sustainable development will apply.</p>
Natural England	No comment	Noted
Individual	Land must be kept for food purposes, a rising population is unacceptable.	Noted
Woolf Bond Planning on	Preparation of a SPD with the aim of facilitating housing development outside currently defined	Support noted.

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<p>behalf of Barratt David Wilson Homes</p>	<p>settlement boundaries is supported, we consider the proposed wording and suggested approach is likely to pull in the opposite direction and could serve to restrict otherwise sustainable development.</p> <p>Promote land at Clanfield for consideration. (LAA ref LAA/CL-001).</p> <p>The SPD fails to reference the presumption in favour of sustainable development at paragraph 11(d) of the NPPF. The 'tests' are too restrictive and will fail to deliver sufficient housing at the most sustainable locations.</p> <p>The SPD should make it clear that the Council will adopt a positive approach to planning applications for the provision of housing outside of the adopted settlement planning boundaries, subject to compliance with all appropriate development plan policies and the criteria set out in the document.</p>	<p>The SPD includes various references to NPPF as considered applicable, including para 9 which refers to 'guiding development towards sustainable solutions'.</p> <p>Agree that the SPD could clarify how proposals would be considered :</p> <p>Recommended Change – insert additional para after Para 3.16</p> <p>New para to read :</p> <p><u>Proposals for development will be considered positively in accordance with this SPD and other development plan policies as appropriate.</u></p>
<p>Vail Williams</p>	<p>It is inappropriate to introduce this document as an SPD as it will effectively be used as a material consideration in determining planning applications against the purposes of the requirements to follow a plan-making process contrary to the NPPF. This is an attempt to create an interim local plan which is considered to be premature to the due processes involved in the formation of the Local Plan.</p>	<p>An SPD is a material planning consideration, but its weight will be balanced against other matters including national and adopted local policy.</p> <p>Preparation of a new local plan has commenced and the SPD once adopted will provide some clarity to allow appropriate development proposals to be given planning permission, in advance of any changes to settlement boundaries through the new local plan.</p>

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	The out-of-date local plan policies which are sought to be protected by the SPD go against the presumption in favour of sustainable development.	
Individual	Proposes suggestions for small scale development in SDNP as people in villages do not want 'cheaply priced' housing or starter housing, as they feel this will detract from the property prices, especially if any is a form of social housing.	The SPD will not apply to SDNP part of East Hampshire.
Headley PC	Support the District Council in enhancing the current Settlement Policy Boundaries. Any proposal outside the SPB should not be allowed unless a good case is provided to suitably justify it as an exception to Policy.	Noted
RPS on behalf of land owners in Ropley	the LPA has sought to “add more flesh to the bones” of policy CP10, so that it is clear to developers and landowners that they will have to go through a considerable number of “hoops” to get any sort of support from the LPA for their proposals. All planning applications should be considered on their merits and there is no need for the council to attempt to subvert this approach through the publication of an SPD that only adds more layers of bureaucracy and does nothing to actually deliver any more, much needed, homes in East Hampshire. Promote land for consideration. LAA/ROP-008/009	The SPD does not avoid the need for proposals to be considered on their merits, it clarifies the purpose of adopted planning policy.
Forestry Commission	No specific comments made on the SPD – advises of various government guidance in terms of assessing sites for future development.	Noted
Individual	Broadly support but must take into account traffic impacts.	Noted

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Plymouth Brethren Christian Church	It is essential within any Local Plan that provision for "exceptions to Policy" are made for the spiritual & moral requirements of the community. National Planning have allowed for Places of Worship on the edge of settlements as providing something of a transition to the adjoining countryside.	This part of CP10 also refers to 'housing and other small scale development outside of settlements boundaries...'. This SPD only applies to housing proposals but CP10 also refers to other small scale development which could include places of worship.
Bramshott and Liphook PC	Settlement boundaries should be updated in accordance with NDP and Local Plans. Requirements seem to favour developers as they have the resource to do the research and supply the necessary reports. Should there be consideration for individual developers, i.e. a lesser burden for single dwelling applications? Appendix 1 - Bramshott is Tier 4 whereas it has no services and should be Tier 5.	<p>It is not the role of the SPD to redraw settlement boundaries, that will be achieved through the new local plan currently being prepared (or new Neighbourhood Plans). New boundaries will take into account recent development and any new land allocations as part of the local plan process.</p> <p>Policy CP10 does not refer to a minimum number of news homes, therefore, the four considerations are also applicable to single dwellings. Any deviations would likely introduce new policy, beyond the remit of an SPD.</p> <p>The settlement hierarchy referred to is also in the process of being updated.</p>
Lovedean Village Residents Association	there are two deficient areas in this SPD. 1) No weighting is shown for each of the four tests. 2) Much reference is made to `neighbourhood plans` as a key aspect of community consultation/involvement. The SPD is deficient in not defining the consultation/involvement processes, due diligence and governance for those communities where no neighbourhood plan exists.	<p>The SPD does not weight the four tests and this is intentional - each test has equal weight. This part of CP10 is an exception to the remainder of CP10 and hence why the criteria are so comprehensive to ensure any development allowed through this route is justified.</p> <p>Neighbourhood plans are mentioned as part of the potential evidence to be able to demonstrate compliance with the respective tests. The SPD clearly</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	Permissions allowed outside the SPB must only be given in exceptional circumstances.	identifies that a two-stage process should be followed in areas where neighbourhood plans are not adopted, consisting of early engagement on the principal of development as well as the details of the preferred proposal.
Individual	<p>concerned over the delay to making an up to date Local Plan and very much hope that this SPD will provide adequate protection against inappropriate or unwanted development in our area.</p> <p>This SPD is considered to be unhelpful in preventing speculative development outside of defined settlement policy areas.</p>	The SPD introduces clarity as to when and how the criteria of Policy CP10 would be applied.
Individual	question why the Settlement Boundary includes only part of Holt Pound. Surely it would be more sensible for all of the Holt Pound settlement to be included.	The SPD does not amend existing settlement boundaries.
Individual	Object – the neighbourhood plan should stand until renewed	The SPD does not change the status of made neighbourhood plans, however, where there is a lack of a 5 year land supply this brings into play Para 14 of NPPF, where a neighbourhood plan may be deemed out of date if it does not comply with each part of para 14.
Individual	It is vital that SPBs are sustained, clear, understood, upheld and that 'countryside is countryside in planning terms whenever it is outside the SPB'. The boundaries references should be the same as those in made neighbourhood plans	The SPD does not amend existing settlement boundaries. The SPD does not change the status of made neighbourhood plans, however, where there is a lack of a 5 year land supply this brings into play Para 14 of NPPF, where a neighbourhood plan may be deemed out of date if it does not comply with each part of para 14.

Respondent	Summary of Representation	Officer Comment and Recommended Action
Alton TC	<p>CP10 effectively becomes 2 policies. The latter part of this policy contradicts CP19 creating a set of criteria to facilitate development outside of SPBs. Setting a bar, however high, creates a situation which did not exist before.</p> <p>CP10 The default should remain that development is only within settlement boundaries.</p> <p>The current policy vacuum at EHDC should not be resolved through a document which greenlights development outside of SPBs; the only way for communities to mitigate this before a new Local Plan is through NPs. Please confirm that where a NP has site allocations and is less than 2 years old any change to CP10 would not have weight.</p>	<p>The status of CP10 has not been altered, the criteria allowing for exceptions has always existed.</p> <p>In terms of 5 year land supply, para 14 of NPPF specifically refers to Neighbourhood Plans and expresses four criteria all of which must be met to enable a judgement to be made as to whether the harm associated with the development proposed “significantly and demonstrably” outweighs its benefit.</p> <p>So in terms of a Neighbourhood Plan this means:</p> <ul style="list-style-type: none"> - The Neighbourhood plan became part of the development plan 2 years or less before the date on which the decision was made - The neighbourhood plan contains policies and allocations to meet its identified housing requirement - The LPA has at least 3 year supply - The LPA housing delivery test was at least 45% of that required over the previous 3 years. <p>Compliance with the above would put a community with an NP in place in a better position to defend proposals outside of settlement boundaries.</p>
Caroline Jezeph on Behalf of Land and Partners	The purpose of the SPD is clearly set out. This consultation process is unnecessarily difficult due to the repetitive nature of this platform (OPUS JDi)	Comments on consultation platform noted.
Individual	The limits of our community boundaries are being tested, act now and protect our villages.	Noted
Woodland Trust	would propose adding a fifth test:	It is not possible through an SPD to expand or change the ‘parent’ policy. In any event all other

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>"Can be delivered in compliance with the environmental policies set out in the East Hampshire core strategy, including policies CP17, CP18 and CP19 on countryside, landscape and biodiversity"</p>	<p>policies will continue to apply to development proposals.</p>
<p>Individual</p>	<p>When planning applications are being considered I can't reiterate enough the importance of the following:</p> <p>Density, local houses being overlooked and additional noise created, Actual foot print of design.</p> <p>Infrastructure: Drainage, Transport, GP's, Schools, Rubbish Collection and Recycling</p> <p>Consideration to local residents comments and to independent reports such as Highways, Environment and Ecology</p>	<p>Noted</p>
<p>Individual</p>	<p>By their nature, site developments outside settlement boundaries can involve relatively severe environmental problems, especially regarding: length of road vehicle journeys, drainage, flood risk, disposal of sewage and pollution, landscape, water abstraction, biodiversity (including on brownfield sites) and archaeological features.</p> <p>Given that these developments are deemed not to require Strategic Environmental Assessments, I suggest that environmental criteria should be included in CP10 (Spatial Strategy for Housing) by adding a clause as follows: "is not likely to lead to greater</p>	<p>It is not possible through an SPD to expand or change the 'parent' policy by introducing a further criteria.</p> <p>In addition to the SPD all other policies both nationally and locally will continue to apply to development proposals.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	environmental or ecological risks than a development within a settlement boundary”.	
Various Individuals	<p>Concern that the Council are proposing new planning guidance which will make it easier to build on greenfield sites;</p> <p>Puts places outside the settlement boundaries at greater risk of speculative development;</p> <p>Building outside of boundaries will have a negative impact on the environment and the declared climate emergency;</p> <p>Should be no building in the countryside – there are plenty of brownfield sites available;</p> <p>Development should only be considered where there is adequate foot and vehicular access to the nearest settlement;</p>	The status of CP10 has not been altered, the criteria allowing for exceptions has always existed. The SPD expands upon the criteria to be applied to proposals on sites outside of settlement boundaries.
Individual	Para 2.2 - 2.6 contradicts Policy CP19 as will allow development in the countryside;	The status of CP10 has not been altered, the criteria allowing for exceptions has always existed. The SPD expands upon the criteria to be applied to proposals on sites outside of settlement boundaries.
Bell Cornwall on behalf of Glen House Estates Ltd	<p>The obvious solution to the housing delivery problem is to enable the redevelopment of Previously Developed Land (PDL) in the countryside for housing purposes.</p> <p>It is accepted that not all PDL in the countryside will be appropriate, but in many cases the redevelopment of PDL in the countryside can deliver sustainable development.</p>	Comment noted – if a PDL site can satisfy the criteria expressed in CP10 and this SPD then it is likely to be favourably considered.

Respondent	Summary of Representation	Officer Comment and Recommended Action
	Promote land for consideration at Woolmer Farm, Bramshott.	
Introduction and Background		
SDNP	<p>The introduction should be more explicit in stating the SPD does not apply to SDNP – particularly as Policy CP10 as quoted includes reference to Petersfield and Liss.</p> <p>Should also refer to para 176 of NPPF which refers to the setting of the National Park, as sites outside settlement boundaries are likely to be within the setting of SDNP.</p>	<p>Reference is already included as to the SPD not applying to SDNP in para 1.4.</p> <p>Para 176 of NPPF refers to development within the setting of national park and that this must be sensitively located and designed to avoid any adverse impacts. It is agreed this part of the SPD could include references to the setting of SDNP.</p> <p>Recommended Change : Under interpretation add additional point “ <u>Para 176 of NPPF also refers to settlements within the setting of a National Park and the need to avoid or minimise any adverse impacts’.</u></p>
Individual	This is just a sneaky way to ignore the Local Plan and its consultation results (so far). This will “let in” developers in the interim, with no link/deference to the final Local Plan – abandon this document and get on with the local plan.	<p>The SPD introduces clarity as to when and how the criteria of Policy CP10 would be applied.</p> <p>Progress is being made with a new local plan for East Hampshire, which will include updated housing needs figures and a revised development strategy in due course.</p>
Criteria 1 Meets a community need or realises local community aspirations		
Individual	Houses being built now are occupied by people moving from London – not local people so not meeting our housing needs;	Noted.

Respondent	Summary of Representation	Officer Comment and Recommended Action
	Need is for affordable housing	
Chapman Lily Planning on behalf of Hurlock Investments Ltd.	Expand the criteria to acknowledge settlements using each others facilities and suggest the following is added ' <i>or supports the housing need of an adjacent settlement where that need is unlikely to be met within the adjacent settlement</i> '. Reference to realise community aspirations is helpful.	The criteria have always existed and it is beyond the remit of the SPD to amend them and or add to them.
Bell Cornwall on behalf of Glen House Estates Ltd	Given the various references to 'community' this needs to be defined. The wording is not sufficiently precise and unambiguous.	Whilst not explicitly defined community in the context of Policy CP10 is about settlements and their resident populations and supporting facilities and services.
Persimmon Homes	<p>The SPD refers to 'Local Surveys' being used to support proposals. However, the Document does not provide guidance on who would be expected to undertake such surveys, nor what the scope of such surveys should be, this should be clarified or deleted.</p> <p>The second component relating to local community aspirations, there is very limited potential to increase housing supply through existing and emerging Neighbourhood Plans in the short to medium term, given that most Neighbourhood Plan allocations have either been delivered or are small-scale.</p> <p>The SPD should make clear that, if local need evidence / information is not available to applicants, Section 1 of the SPD will not be used to refuse applications that are otherwise acceptable. This suggested amendment to the SPD will introduce</p>	<p>Criterion 1 includes reference under sources of evidence to 'Local housing needs surveys as part of neighbourhood plans' and generally to 'local surveys'.</p> <p>This part of the SPD is about a demonstrable need for additional housing in response to local housing needs. It is agreed the second reference to 'local surveys' is not needed as the evidence requirement is covered by reference to local housing needs surveys, this is however is expressed only in the context of neighbourhood plans. However, a number of communities undertake such to understand other opportunities for local housing such as self-build and rural exception sites. To enable a wider application the reference should be expanded to also include ' or other similar surveys'.</p> <p>Recommended change :</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>much needed flexibility into the SPD and expedite housing delivery, which will ultimately assist the Council in boosting its housing supply</p>	<p>Local housing needs surveys as part of Neighbourhood Plans <u>or any other similar survey to support the need for local housing.</u></p> <p>Delete reference to Local Surveys.</p> <p>This part of the SPD is expressed as either/or allowing an applicant to be able to submit evidence under either category, which provides flexibility to criterion 1 and should be retained.</p>
Rowlands Castle PC	<p>‘Source of Evidence required to demonstrate compliance add (this should be the most recent data available)’.</p> <p>Realises community aspirations should also include reference to Village Design Statements.</p> <p>The SPD must give further details of how, when a planning application is being considered, the number of dwellings needed in a parish will be established. This is necessary to avoid an inequitable distribution of developments across the individual Southern Parishes and the District in general.</p> <p>The SPD should also indicate how ‘phasing’ of developments over the likely plan period of the emerging Local Plan will be controlled.</p>	<p>The sources of evidence already refers to (this should be the most recent data available).</p> <p>Whilst village design statements are primarily about the appearance and layout of proposals, these may be a valuable source of data to inform and justify the need for additional local housing to be considered under this part of the SPD.</p> <p>Recommended change :</p> <p>Add <u>Village Design Statements</u> under Parish/Village Plan.</p> <p>It is not the role of the SPD to provide housing numbers per settlement/parish – this is already expressed in Policy CP10. Similarly, it is beyond the remit of the SPD to refer to the phasing of</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
		development over the plan period of the emerging Local Plan. That is a matter for the Local Plan currently being prepared.
SMASH	<p>We note that the council consider “community need” as that which is beneficial to the local community in terms of the accommodation type, tenure and size of dwellings proposed.</p> <p>Suggest that under evidence reference should be made to the document “East Hampshire Place Making Strategy 2019 to 2036” as an additional source of local need requirements. In addition, it should be made clear that developments that only meet the minimum Policy targets (i.e., for affordable houses) alone would not be considered to fully meet this test; additional requirements addressing the “proven community need” must also be included, e.g., bungalows for elderly residents.</p> <p>The term “realises local community aspirations” is all too encompassing and loose and should be tightened to say something like, “Planning applications should meet specific infrastructure and/or facility upgrades based on independently conducted, evidence-based surveys (involving local residents where appropriate) or those aspirations that have been highlighted in other agreed and approved documents.</p>	<p>East Hampshire Place Making Strategy covers many matters beyond land use planning, it also covers the whole District, whereas the Local Plan and SPD only focus on the East Hampshire Local Planning Authority Area. The list of suggested evidence is considered sufficient to enable any local aspirations to be identified and justified if necessary.</p> <p>It should be noted that the suggested evidence list – is just that, a suggestion of sources, it does not preclude other documentation being used to justify a proposal.</p> <p>It is not the purpose of the SPD to be excessively prescriptive on the nature and type of proposals that could come forward through this route, other local plan policies and SPD’s will also apply to any applications received.</p> <p>Realises local community aspirations is quoted direct from adopted policy CP10. The interpretation section includes reference to infrastructure, community facilities or other improvements to enable the community to realise their local aspirations. It is considered this is sufficient within the remit of an SPD to allow for matters proportionate to any proposal being presented to be considered.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
Individual	Clarify if reference to Parish/village plan includes Village Design Statements; EHDC Community Facilities Study needs to be updated, also cross reference this test to test 4 in terms of identifying community needs and aspirations.	<p>See above Recommended change to include reference to Village Design Statements.</p> <p>The Community Facilities Study has recently been updated and is available to view on the Council's website Community facilities study East Hampshire District Council (easthants.gov.uk).</p> <p>The preamble to Test 1 refers to the potential overlap with Test 4 so this matter is covered.</p>
Metis Homes	Agree with this test – suggest that the evidence should be the most recent available and there should be reference to this in the SPD in terms of actually specifying what the evidence says, particularly from the HEDNA and housing need.	<p>The sources of evidence already refers to (this should be the most recent data available).</p> <p>It is not possible in the SPD to specify what the evidence actually says as this could change through the passage of time once the SPD is adopted and operative.</p>
Pro Vision on behalf of Herriard Estates	For development proposals where a neighbourhood plan is not in place or the village/ parish plan is more than 5 years old and has not been adopted as an SPD, the SPD should provide greater flexibility in terms of the types of information the Council will accept to demonstrate this criteria. This might include market data or information from local estate agents which demonstrates a proven interest for housing in the area.	<p>This part of the SPD is about a demonstrable need for additional housing in response to local housing needs.</p> <p>It should be noted that the suggested evidence list – is just that, a suggestion of sources, it does not preclude other documentation being used to justify a proposal, although it would be expected that this has a local focus to the proposal rather than more general commentary on the housing market.</p>
DHA Planning on behalf of Bellway	This test should not be used as a barrier to delivery, the provision of housing is a community need and	The policy requirements 'meets a community need' or 'realises local community aspirations' is quoted direct

Respondent	Summary of Representation	Officer Comment and Recommended Action
Strategic Land and Countryside Partnerships PLC	<p>should be sufficient to comply with this requirement even if a further piece of infrastructure is not capable of being secured.</p> <p>By nature of the wording, without due care there is a risk that the clause could displace development to less sustainable areas and penalise settlements that are best served by infrastructure (and least deficient).</p>	<p>from adopted policy CP10, neither of which could be considered as a barrier to delivery.</p> <p>This criterion by being expressed as two options provides flexibility to enable proposals to come forward under either element.</p>
Abri	Two sources of evidence - the Housing Register and Help to Buy/First Homes Register could be added to the evidence column as housing needs surveys are not regularly undertaken.	<p>Agree</p> <p>Recommended Change : add Housing register and help to buy/first homes register to the evidence list</p>
Medstead and Four Marks Neighbourhood Plan Steering Group	Appears to be a discrepancy between column 2 and 3 - suggest column 3 is amended to read " <i>an analysis of the different needs of the community of the nearest settlement</i> "	<p>The purpose of column 2 is to explain how the criterion is to be applied, whereas column 3 simply lists potential sources of evidence to be able to demonstrate compliance with column 1 and 2.</p> <p>The HEDNA quoted (column 3) is a technical piece of work on housing needs across this District which is reflected in the text. To avoid confusion it is suggested that this is deleted and the reference is simply to the HEDNA and this is added as a hyperlink direct to the most recent version.</p> <p>Recommended Change : Housing and Economic Development Needs Assessment - this includes extensive analysis of the different needs across the District, with details on population by age; affordable and social rented needs, households with dependent children.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
LRM Planning on behalf of Hallam Land Management Ltd	CP10 refers to a district wide need for housing yet the SPD explores more local community need, which creates a tension between the various bullet points particularly 1 and 4. Request the phrase community need is determined more widely, rather than community of the nearest settlement	The role of the SPD is to expand upon the criteria on CP10. This part of CP10 is expressed as an exceptions type approach to allow development beyond defined settlement boundaries. The council therefore considers it is appropriate to establish what would be required to satisfy this part of CP10 and in this respect linking this with the community of the nearest settlement is considered appropriate to ensure that any proposals allowed through this mechanism has a local benefit.
Barton Willmore (Stantec) on behalf of Reside Developments Ltd.	<p>It is unclear as to what 'local surveys' would include, and this needs to be clarified?</p> <p>It would be helpful if the SPD could confirm that promoters can also provide their own evidence of need, demand and benefit. In terms of housing, in addition to affordable tenures, there is the opportunity to provide for self-build, custom build as well as later life living and retirement.</p>	<p>See above recommendation to delete reference to local surveys.</p> <p>The evidence list does not preclude other sources of data being presented to provide the necessary details to support the criterion.</p>
Falcon Developments	The sources of evidence to demonstrate compliance should be clearly defined to ensure that no <i>singular</i> method outranks one of the others in order of priority.	The evidence list is not presented in order of priority – it lists examples of where relevant data may be sourced to support a proposal.
Individual	all services are at full capacity and further development would reduce water pressure – suggest this is expressed as <i>“Planning applications should meet specific infrastructure and/or facility upgrades based on independently conducted, evidence-based surveys (involving local residents where appropriate)</i>	To make the change as requested would be potentially disproportionate to the proposal. Other local plan policies and SPD’s will also apply to any applications received to enable an assessment of impact of the proposal on the locality and whether this justifies planning conditions etc to be attached to any grant of permission.

Respondent	Summary of Representation	Officer Comment and Recommended Action
Woolf Bond Planning on behalf of Barratt David Wilson Homes	This only implies 'existing' communities' needs are factored in and does not consider migration in towns/villages; and it is generally fair to comment on that those completing local housing needs surveys as part of NP currently live in a home and cannot speak for those wanting to buy or rent in that community	Housing needs surveys by their nature explore potential future need from existing residents whether this be young people looking for a place of their own in the future, or other wishing to upsize/down size
RPS on behalf of land owners in Ropley	The purpose of this criterion is clearly to discourage applications on land that is not allocated in a Neighbourhood Plan.	That is not the purpose of the SPD, which is to provide clarity to Policy CP10.
Individual	It is considered unlikely that there will be a "community need" . the key community need is invariably affordable housing. It is believed that developers see this type of provision as largely non profit-worthy.	Affordable housing can be provided in any event through policy CP14 which allows for rural exception sites. The purpose of the SPD is to allow market housing and depending on the scale of the proposal affordable housing in accordance with adopted local plan policies.
Alton TC	Community Need has to be defined. Is this subjectively assessed or objectively? Is this a top down perceived community need on the basis of lack of housing nationwide? If the community don't want it but it is needed to maintain a 3 or 5 year land supply or delivers other strategic or infrastructure objectives set by the Council what would get more weight?.	The SPD includes an explanation as to how the Council considers this part of the criterion as being defined, as that which is beneficial to the local community in terms of accommodation type, tenure and size of dwellings being proposed. So the focus is on the local community rather than wider provision. Allowing proposals through this route would also support the supply of new housing and feed into land supply calculations.
Individual	These comments are objecting to the proposed developments in and around Four Marks and Medstead based on need which is beneficial to the local community. The increased demand on services is not beneficial to the local need, turning green belt	Comment noted - recent developments would have been delivered through the application of the other elements of CP10, rather than the matters expressed in the SPD.

Respondent	Summary of Representation	Officer Comment and Recommended Action
	land into brown belt is contrary to basic environmental sustainability.	
Individual	Recent developments within Four Marks and Medstead have NOT met this criteria. This criteria should be rigorously enforced if the planning process is to retain credibility.	Comment noted - recent developments would have been delivered through the application of the other elements of CP10.
Criteria 2 Reinforces a Settlement's Role and Function		
SDNP	Refer to para 176 of NPPF - as well as reinforcing role and function proposals within the setting of the National Park should also reinforce the character of the settlements.	<p>Para 176 of NPPF refers to development within the setting of national park and that this must be sensitively located and designed to avoid any adverse impacts. Its is agreed this part of the SPD could include references to the setting of SDNP.</p> <p>Recommended Change : Under interpretation add additional point “ <u>Para 176 of NPPF also refers to settlements within the setting of a National Park and the need to avoid or minimise any adverse impacts’.</u></p> <p>Under application add additional point “<u>Consider the impact of the proposal on the setting of the South Downs National Park, if applicable.</u>”</p>
Chapman Lily Planning on behalf of Hurlock Investments Ltd.	Should include reference to NPPF 79 – in terms of location of new housing enhancing or maintaining the vitality of rural communities. The SPD as worded restricts the opportunity to enhance the role of settlements. See previous comments on application of sites identified under Settlement Policy Boundary Review : Interim Methodology, published in 2018.	<p>NPPF para 79 is referred to in the supporting text of the SPD at para 3.4.</p> <p>Disagree that the SPD would restrict opportunities to enhance the role of settlements – this criteria is explicitly expressed to ensure proposals positively consider this matter.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
<p>Bell Cornwall on behalf of Glen House Estates Ltd</p>	<p>This Test requires further clarification and guidance. Perhaps ‘services and facilities’ would be a more appropriate term to use to clarify what is envisaged by ‘activities’?</p> <p>The reference to accessibility and walking/cycling distance suggests that this policy guidance is aimed at preventing isolated homes in the countryside. Yet the policy itself is focused solely on the <i>role and function</i> of the settlement, rather than accessibility issues.</p> <p>If indeed this policy is aimed at preventing the development of isolated homes in the countryside, then the SPD could make this clearer, for example by clarifying that test 2 of CP10 is aimed at sustainable development in the countryside, where is it <i>well related to an existing farmstead or group of buildings, or located close to an established</i>. The SPD should provide a definition of what the Council consider isolated development to be.</p> <p>The SPD could also suggest a quantum of development which is considered suitable in non-isolated locations outside of settlement boundaries.</p>	<p>Agree ‘services and facilities’ are more broadly understood compared to ‘activities.’</p> <p>Recommended change: replace all references to ‘activities’ with ‘<u>services</u>’.</p> <p>The reference to walking and cycling is included in the application of this criterion to enable consideration of the proximity of any proposal to the established settlement/community. It is not the intention of the SPD to enable the proliferation of sporadic development that has no functional relationship to an existing settlement. Agree that this could be clarified.</p> <p>Recommended change : Under application - The proposal needs to make a positive contribution to the existing <u>settlement</u> (spatial) pattern of development <u>and not lead to isolated homes in the countryside.</u></p> <p>It is beyond the remit of the SPD to indicate quantum’s of development, these are established through Policy CP10.</p>
<p>Rowlands Castle PC</p>	<p>Village Design Statements and (local) Settlement Character Assessments should also be sources of evidence.</p>	<p>Agree.</p> <p>Recommended Change: add reference to <u>Village Design Statements</u> and <u>Settlement Character Assessments</u> in the evidence column.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
SMASH	<p>The Council's current Settlement Hierarchy document, should be strictly honoured. Any planning proposals, should reinforce the existing designation, and not contrive to push a settlement up the hierarchical ladder to then create a strategy for greatly increased housing numbers, based on a new designation. The council should robustly enforce the requirements in this test to keep the scale of any development proportionate. The designations as stated in the current approved Local Plan should be upheld until that time when the plan gets updated.</p>	<p>It is not the purpose of the SPD to move settlements into different tiers of the settlement hierarchy or to adjust the hierarchy in any way.</p> <p>As part of preparation of the local plan the settlement hierarchy is being assessed, a revised hierarchy will be presented in Local Plan part 2 consultation scheduled for September 2023, following any feedback received to the Part 1 consultation which closes in January 2023.</p>
Individual	<p>There is no value in this criteria as any development will support existing services and facilities.</p>	<p>Noted – this criteria reflects Policy CP10.</p>
Pro Vision on behalf of Herriard Estates	<p>The 'Application' criteria which requires that '<i>The site is accessible and within reasonable walking or cycling distance to the services and facilities available</i>' is at odds with the NPPF. It is not an appropriate criterion against which smaller development proposals outside of settlement boundaries should be assessed against as it's inherently likely that new development in locations outside of settlements with defined settlement policy boundaries will be served by facilities and services in other settlements which are a short bus or car ride away. This is also contrary to Paragraph 105 of the NPPF which makes clear that significant developments should be focussed on locations which are or can be made sustainable. It is suggested that the guidance should be to consider whether a proposal is proportionate to the existing settlement which it proposes to extend.</p>	<p>The reference to walking and cycling is included in the application of this criterion to enable consideration of the proximity of any proposal to the established settlement/community, which reinforces the other criteria and the overall purpose of this part of CP10.</p> <p>The application guidance also refers to proposals need to be proportionate so as not to fundamentally change the role and function of the settlement to which it relates. It is not considered that this criterion conflicts with the NPPF as it is not the intention that 'significant' developments come forward through this route, this is a function of the local plan as expressed in the supporting text at para 3.11.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
DHA Planning on behalf of Bellway Strategic Land and Countryside Partnerships PLC	<p>Concur with the broad objective, and suggest that the guidance should go further and make clear that the Council will support major development proposals that relate to higher order settlements in the hierarchy, in recognition of the greater capacity of primary and secondary tier settlements to accommodate major growth.</p> <p>The SPD should set out that applications for major housing adjacent to higher order settlements will be considered favourably, reflecting their suitability to accommodate greater housing, facilitate a reduction in vehicle trips and their strategic role both within the district and regionally.</p> <p>Consideration of the ability of the development proposal to provide and/or contribute to active travel and public transport improvements should be included in assessing the ability of applications to reinforce a settlement's role.</p>	<p>The application guidance also refers to proposals need to be proportionate so as not to fundamentally change the role and function of the settlement to which it relates. It is not considered that this criterion conflicts with the NPPF as it is not the intention that 'significant' developments come forward through this route, this is a function of the local plan as expressed in the supporting text at para 3.11.</p> <p>Disagree this is a function of the local plan.</p> <p>The SPD includes reference to the ability to walk/cycle in this criterion. Developments that would enable the provision of improved public transport services are likely to be strategic in nature and therefore a function for the local plan, not this SPD which simply expands upon adopted policy.</p>
Abri	<p>The guidance should look to further support proposals that will enable more people to remain in the area, maintaining links to employment, education and social activities.</p>	<p>This is covered by criterion 1 – meets a community need or realises community aspirations.</p>
Falcon Developments	<p>This test is clear in its role and consistent with the NPPF, however the Council should consider a 'degree of tolerance' for each settlement to be expanded, offering respective levels of growth across all localities with a settlement boundary in the District.</p>	<p>It is beyond the remit of the SPD to express quantum's of development that may be acceptable through this route.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
Woolf Bond Planning on behalf of Barratt David Wilson Homes	Also need to consider that first and second tier settlements will have a limit on their expansion, either by natural constraints or infrastructure capacity, so the spatial strategy needs to recognise that areas such as Clanfield (Tier 3) settlements can accommodate additional growth. Promote land south of Chalton Land Clanfield for 150 dwellings (LAA/CL-001).	It is not the purpose of the SPD to move settlements into different tiers of the settlement hierarchy or to adjust the hierarchy in any way.
RPS on behalf of land owners in Ropley	Clearly, this simply means that any proposal should be in proportion to the settlement it adjoins or is near to. Any development within or on the edge of a small village, such as Ropley, will, by definition, be modest in scale	Agree.
Alton TC	Agree with this criteria	Noted.
Criteria 3 Cannot be Accommodated within the Built-up Area		
Individual	Built-up area is within the settlement boundary – unlikely there would be community evidence to justify sites outside	The SPD interprets this phrase as ‘ the nearest settlement to which the proposal relates’, on the basis that this part of CP10 is about releasing additional land for development in suitable locations in accordance with the four criteria.
SDNP	Refer to para 176 of NPPF – evidence should be required to demonstrate that the proposal is sensitively located and designed to avoid/minimise adverse impacts on SDNP. Should also refer to Landscape Character Assessments under sources of evidence.	Para 176 of NPPF refers to development within the setting of national park and that this must be sensitively located and designed to avoid any adverse impacts. Its is agreed this part of the SPD could include references to the setting of SDNP. See Recommended changes above. Agree to including Landscape Character Assessments to the suggested sources of evidence.

Respondent	Summary of Representation	Officer Comment and Recommended Action
		<p>Recommended change: Add reference to <u>Landscape Character Assessments</u> to the sources of evidence.</p>
Chapman Lily Planning on behalf of Hurlock Investments Ltd.	It is suggested that the following should be added before the word 'brownfield' – <i>'appropriate and deliverable'</i> for clarity.	<p>Agree</p> <p>Recommended change: Insert <u>'appropriate and deliverable'</u> where references to brownfield are included.</p>
Bell Cornwall on behalf of Glen House Estates Ltd	<p>The guidance requires a sequential analysis of available sites this is considered overly onerous, given it would apparently apply to all proposals, major and minor.</p> <p>Welcome the suggestion that small scale development within an established cluster of dwellings may be appropriate but the reference to 'infill' should be removed to allow sufficient flexibility to deal with the arrangement of rural clusters of buildings, which may not follow established street patterns of built up areas.</p>	<p>It is not considered that this is an overly onerous approach given the nature of this part of the CP10 in setting out criteria in which to consider exceptions for development outside of defined settlement boundaries.</p> <p>The reference to 'infill' is intentional to enable some control as to the scale of potential proposals in situations where there is no existing defined settlement boundary.</p>
Persimmon Homes	<p>The SPD's interpretation of 'edge/adjacent' to a settlement requires further explanation. The Council will be aware of recent case law that concludes that sites do not have to be immediately adjoining SPBs to be considered adjacent to a settlement. The SPD should reflect current case law.</p> <p>This element of the SPD effectively introduces a new sequential policy test whereby sites within the SPBs are considered first, then sites on the edge/adjacent</p>	<p>The SPD is expressed to provide flexibility in this respect as the application details refer to 'preference would be to those sites....'</p> <p>The SPD reflects existing adopted policy in CP2 and CP10, in terms of reference to making the most of previously developed land with the existing built up area in the first instance, it is therefore not considered this introduces a new policy test.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>to SPBs, then finally sites that are detached from settlements. When considering sites, the SPD also indicates that brownfield sites should be prioritised above greenfield sites. Although subtle, contrary to advice in the PPG, the requirements of this element of the SPD introduce a new policy test (i.e. locational and brownfield status test) that does not form part of CP10.</p> <p>To assist applicants in demonstrating adherence to this element of CP10, the SPD should clarify whether it is only 'green' LAA sites that should be considered as part of this sequential test, or whether amber / red and discounted sites should also be assessed.</p>	<p>Recommended change:</p> <p>'In the first instance, consideration must be given to whether there are any brownfield sites that are more favourably located within the settlement closest to the proposal, in advance of considering a release land beyond the settlement boundary. <u>This is in accordance with Policy CP2 and CP10 which requires new development to make the best use of previously developed land within existing built-up areas.</u></p> <p>It is beyond the remit of the SPD to indicate which sites submitted and considered through the Councils land availability assessment process should be considered further.</p>
Rowlands Castle PC	Local Landscape Character Assessments must also be a source of evidence.	<p>Agree.</p> <p>See above Recommended Change.</p>
SMASH	<p>This statement could give developers the incentives to "engineer" proposals to facilitate building outside of a built-up area. In addition to the Council's Brown Field site register, there should also be a register of "Green Field" sites (available or not) within each settlement boundary, such that these areas should be developed before any consideration should be given to development outside the SB.</p> <p>Suggest the statement in the SPD should be qualified to say "only as a last resort and following</p>	<p>The Councils land availability assessment includes both green and brownfield sites, within and outside settlement boundaries.</p> <p>The SPD reflects existing adopted policy in CP2 and CP10 - see above response and Recommended change.</p> <p>It is considered that to make the suggested change would place an onerous requirement on proposals. Developers only have control over their clients site</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>consideration of brownfield and greenfield sites in the settlement in question and in neighbouring settlements should planning be considered outside the built up area. There needs to be clear and demonstrable independent evidence that the developer has cast their net both inside and adjacent to the affected settlement to see if there are any suitable alternative sites for development and to include what sites have been considered and reasons for rejection. The principal mechanism for allocating land outside the SPB is via the process of Local Plan preparation, consultation and approval, not by speculative applications.</p>	<p>and not any others, so it would be unrealistic to request them to consider alternatives.</p>
Individual	<p>They are few brownfield sites available, support the statement that refers to small scale infill within existing clusters, but would be concerned for larger developments coming through this route. The status of Lower Froyle in the settlement hierarchy needs clarifying.</p>	<p>Noted.</p> <p>The Settlement hierarchy is being reviewed as part of the new local plan and this will provide the opportunity to clarify the situation with Lower Froyle.</p>
Metis Homes	<p>To avoid delay the SHELAA and brownfield register should be used as up to date evidence of available sites and where through these settlements are demonstrated as not having capacity to meet development within the boundary then this test should be considered as satisfied.</p>	<p>This criteria requires evidence to be submitted to this effect, but utilising various evidence sources.</p>
Pro Vision on behalf of Herriard Estates	<p>The requirement for a sequential test is not in accordance with spirit of the NPPF, Policy CP10 or the purpose of an SPD. A planning application does not present the same opportunities with site selection as a local plan process does. While there may be</p>	<p>The SPD reflects existing adopted policy in CP2 and CP10 - see above response and Recommended change.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>brownfield sites in the closest settlement this doesn't mean that the landowner wishes to bring them forward for development, or that an applicant can choose to develop these sites before other greenfield sites. Applicants can only control land within their ownership. Planning decisions should therefore be made on the merits of the site and proposal being considered, not on whether other sites in the local area would be more appropriate.</p> <p>With regard to level 6 settlements is the intention to limit this to infill only – this needs clarification and suggest any reference to infill is removed to allow applications to be considered on their merits.</p>	<p>Level 6 settlements are those without defined settlement boundaries so would fall outside the remit of this SPD where Policy CP10 specifically refers to 'outside policy boundaries'. So by referring to infill in these circumstance will provide some flexibility, to allow small scale development in appropriate locations which is considered justified, given level 6 settlements are small with little/no services and facilities to support their communities.</p>
National Trust	<p>Support test 3 '<i>cannot be accommodated within the built up area</i>' which introduces a sequential test for developers to demonstrate the availability of sites within the relevant existing settlement boundary in the first instance. This is considered important as speculative development will come forward outside of the plan-making process and sites have therefore not been tested alongside other sites to ensure that it achieved sustainable development within the District.</p>	<p>The SPD reflects existing adopted policy in CP2 and CP10 - see above response and Recommended change.</p> <p>Application of the SPD will indeed allow proposals to come forward outside of the local plan process, hence the need for the SPD to clarify the circumstances when this is considered to be appropriate.</p>
DHA Planning on behalf of Bellway Strategic Land and Countryside Partnerships PLC	<p>Given the declining housing land supply there should be caution in overly prioritising sites within the settlement boundaries, particularly where there are constraints to deliverability. By contrast, edge-of-settlement greenfield sites typically represents a reliable source of housing supply and are less affected by matters such as viability. The SPD must provide sufficient flexibility in order to ensure that</p>	<p>The allocation of large sites is a function for the local plan.</p> <p>The SPD reflects CP10 and the flexibility offered by that and other adopted policies. Indeed the SPD refers to accessibility under criterion 2.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>sites that genuinely are or can be made accessible are prioritised.</p> <p>Settlement boundaries are a useful starting point, but they do not necessarily reflect the accessibility of locations to key services and amenities, so a pragmatic approach should be taken, where sites are also considered in the context of their accessibility.</p>	
Abri	<p>Further guidance on the use of the sequential approach in this element of the policy is useful. The guidance should follow the NPPF housing land availability tests, setting out whether sites are deliverable (available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years), this is a logical test that can be readily carried over into supporting guidance for CP10 without setting new policy.</p>	<p>The SPD reflects existing adopted policy in CP2 and CP10 - see above response and Recommended change.</p> <p>The SPD will not be allocating sites and therefore will only be applied in response to planning applications, so there is no need to amend the SPD to refer to the availability of sites, on the assumption that if a planning application is submitted there is a willing land owner wishing to see it developed and consequently it is available etc.</p>
Barton Willmore (Stantec) on behalf of Reside Developments Ltd.	<p>Whilst there is a logic to considering how an 'exception site' under CP10 relates to and would support an existing settlement and the settlement hierarchy, this is more properly considered under the 'Meeting a Community Need'.</p> <p>It is not for the SPD to introduce a new element to CP10 such through an additional level in the sequential test, "to demonstrate the availability of sites within an existing boundary followed by sites on the edge/adjacent before consideration of sites further away".</p>	<p>The SPD reflects existing adopted policy in CP2 and CP10 - see above response and Recommended change.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
Falcon Developments	The Council should provide a 'Sequential Test' template to accommodate this test, A simplified approach of the site being located 'adjacent to a settlement boundary' would be a far more deliverable approach.	The SPD reflects existing adopted policy in CP2 and CP10 - see above response and Recommended change.
Individual	the statement in the SPD should be qualified to say <i>"only as a last resort and following consideration of brownfield and greenfield sites in the settlement in question and in neighbouring settlements should planning be considered outside the built-up area. There needs to be clear and demonstrable independent evidence that the developer has cast their net both inside and adjacent to the affected settlement to see if there are any suitable alternative sites for development and to include what sites have been considered and reasons for rejection.</i>	The SPD reflects existing adopted policy in CP2 and CP10 - see above response and Recommended change.
Woolf Bond Planning on behalf of Barratt David Wilson Homes	even if a brownfield site is available, it does not mean it is deliverable or viable and often brownfield sites have multiple other constraints.	Noted
RPS on behalf of land owners in Ropley	The built-up area is the nearest settlement to the proposal. Schemes on the edges of settlements are preferred to proposals further away. Any application needs to justify itself and prove that there are no brownfield sites available within or outside of the nearest settlement	Noted
Individual	I have it on good authority that the County of Hampshire, but in particular East Hampshire District	Noted

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>Council, is regarded as a 'soft' touch for planning permissions by developers.</p> <p>Object to the SPD as this allows more weight to 'sites on the edge/adjacent of SPBs'. This will allow a different, indeed vague, interpretation of the democratically adopted Local Plan.</p>	
Individual	This is the whole ethos of the SPD.	Noted
Alton TC	<p>"Cannot" needs to be defined. Is this about land availability or deliverability? If developers are land banking brownfield sites, or saying that on viability grounds they cannot build within the SPD as costs are too high, this is not sufficient.</p>	<p>'Cannot' is part of Policy CP10 and the SPD is attempting to explain what this means and how a proposal could be justified</p>
<p>Criteria 4 Has been identified in an adopted Neighbourhood Plan or has clear community support as demonstrated through a process which has been agreed by the Local Planning Authority in consultation with the Parish or Town Council.</p>		
Individual	<p>Request this states '<i>development that contravenes one or more policies of a made Neighbourhood Plan cannot pass Test 4</i>'.</p>	<p>The development plan consists of both the adopted local plan documents and made neighbourhood plans, therefore proposals would be considered against these policies as appropriate.</p>
Individual	<p>Query the validity and effectiveness of a neighbourhood plan more than 2 years old; Concern this would result in sites being agreed without suitable engagement</p>	<p>Para 14 of NPPF sets out when the presumption in favour of sustainable development and the 'tilted balance' would be applied – this is The NP became part of the development plan within two years; the NP includes policies and allocations to meet its housing requirement; the NP has at least three years housing supply and the LPA housing delivery test was at least 45% - all these must be satisfied otherwise an NP would be considered out of date and the tilted balance would favour the development .</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
Chapman Lily Planning on behalf of Hurlock Investments Ltd.	This could be expanded to enable developments to go ahead where they meet the other criteria including those on sites outside neighbourhood plan settlement boundaries. In terms of clear community support this may prove in practice to be difficult to define.	This criterion is expressed as two elements either inclusion within an Neighbourhood Plan or the proposal has clear community support. There is nothing that precludes a site outside of a Neighbourhood Plan settlement boundary coming forward if this has clear community support and fulfils the other criteria.
Standard response submitted by 7 individuals	<p>Request reference to sites in Neighbourhood Plans be amended to read : 'the following sites should come forward in advance of any others: 1) sites allocated in Neighbourhood Plans; 2) sites previously allocated (in the Local Plan or Neighbourhood Plan) where the full number of units allocated has not yet been completed should be extended so that the original number of units can be developed on nearby or adjacent land where access and services permit.'</p> <p>This change supports the sites allocated as part of the Local Plan part 2 adopted in 2016 and ensures that the sites allocated are delivered where infrastructure is already provided.</p>	<p>This criterion has two components either one needs to be satisfied.</p> <p>The first directly refers to neighbourhood plans. Only two of the made NP's in the District include sites allocated for development. The rate at which sites are brought forward is not a matter for this SPD, once a site is allocated in either a local or neighbourhood plan it remains as such. With regard to expanding already allocated sites this is a matter for the local plan.</p>
Persimmon Homes	There are a number of areas in the District where Neighbourhood Plan areas have been designated, but have not been made. However, following a review of the progress of these plans it is clear that the emerging Neighbourhood Plans have either not progressed or are being delaying to await the next draft of the Local Plan.	<p>Comment on Neighbourhood Plans is noted, however the Council cannot dictate how fast a neighbourhood plan is progressed once designated.</p> <p>The latest SCI adopted December 2021 includes guidance on planning applications and sets the expectations for engagement on these.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>As such, the Council should be aware of the very limited potential that number of new homes that will be brought forward under this component of the SPD in order to boost housing supply.</p> <p>The SPD should make clear that if the SPD's engagement / consultation requirements are met then any subsequent planning applications will be positively determined by EHDC. To avoid misleading local communities, it is important that SPD clarifies that they do not have a 'veto' on whether schemes are acceptable under this element of the SPD.</p> <p>Consultation requirements for planning proposals (i.e. the second component of this part of the SPD) are set out in the Council's Statement of Community Involvement (December 2021) (SCI). The requirements of SPD go beyond those set in the SCI, and effectively introduce new policy requirements contrary to the requirement of the NPPF.</p>	<p>Para 6.4 of the SCI refers to the need for pre-application advice particularly on major and sensitive sites, it is agreed that the SPD needs to be proportionate in its approach reflecting already adopted policy.</p> <p>Recommended Change ; <u>".....The Council will however require that the following two stages of consultation have been undertaken, where the proposal is for major development or is on a sensitive site. For small scale developments (9 or less dwellings) stage 2 engagement that focuses on the nature and scale of the proposal including design and layout matters is considered acceptable. In all instances the engagement must also comply with the most recent version of the Council's Statement of Community Involvement."</u></p> <p>Plus minor consequential edit under the evidence column 4th bullet'community engagement at both stages 1 and 2 <u>(as applicable)</u> have been taken'</p>
SMASH	Any surveys executed to show/demonstrate community support should be carried out by independent experts that have been approved by the Council and should continue to be financed by the applicant. It is not just the process/method of consultation that should be agreed with the Council's	Any survey results will be assessed by the Council as part of the planning application process. The Council is seeking the process to be agreed, but does not wish to prescribe all the details as this will need to be proportionate to the nature and scale of the proposal.

Respondent	Summary of Representation	Officer Comment and Recommended Action
	Development Management Team, but also the content of this engagement and then this agreement should be documented and available to view – its should also state we that the raw data is available for retrospective audit if required and it must be GDPR compliant. Additionally, all valid objections/support comments received on the EHDC planning portal, when an application goes out for public consultation should be given material weight.	Similarly any representations received to a planning application are given due consideration in respect of whether the matters raised are material planning considerations.
Individual	Support the need for a consultation process on a case by case basis.	Noted.
Metis Homes	<p>Some sites in NP's cannot come forward in advance of alternative sites because they are not deliverable. These should only be included in the assessment where they meet the definition of deliverable.</p> <p>Support the need for community support but request that this is clarified to refer to majority support and a quorum threshold set.</p>	<p>Only two neighbourhood plans include site allocations and presumably were considered to be deliverable through the examination process to be retained within the NP.</p> <p>It is not possible to express a quorum threshold with which to determine what constitutes a majority support.</p>
Pro Vision on behalf of Herriard Estates	The consultation requirements are at odds with the SCI there should be a sliding scale of consultation - for schemes of 5 or less units there should be less burden for consultation and proportionate to the scale of development for others. Additionally, there should be no requirement to consult on permission in principle applications (PiP). This criteria goes above and beyond the adopted SCI and should be amended to reflect the SCI.	The latest SCI adopted December 2021 includes guidance on planning applications and sets the expectations for engagement on these. See above response and recommended change
Beech PC	Test 4 should also state that, for the avoidance of doubt, development that would contravene one or	This criterion only relates to sites allocated for development in a neighbourhood plan. Policies within

Respondent	Summary of Representation	Officer Comment and Recommended Action
	more policies of a made Neighbourhood Plan cannot pass Test 4. This is in recognition that a Neighbourhood Plan is the result of the highest standard of local consultation that is available	a Neighbourhood plan will be applied as applicable to the proposal, along with Local Plan policies and national policies in NPPF.
DHA Planning on behalf of Bellway Strategic Land and Countryside Partnerships PLC	The SPD should introduce a clear statement that this policy criterion is defunct at a point that a five year housing and supply cannot be demonstrated.	<p>At present the Council cannot demonstrate a 5 year land supply, the implications of this are that proposals may be favoured after application of the titled balance, regardless of the SPD.</p> <p>The SPD will provide guidance as and when a 5 year land supply can be demonstrated.</p>
Medstead and Four Marks Neighbourhood Plan Steering Group	Request that the consultation statements referred to are published as part of the planning application documentation and sent to parish councils in advance of them being submitted to EHDC, allowing the relevant body to make comments on the statement .	The criterion already requires the process of seeking community support to be agreed by the Council in consultation with the parish or town council. Any responses would then be published as part of the planning application process, at that point the parish councils would be able to view and comment if deemed necessary – however it will be a planning judgement as to whether this and the other criteria are met and whether the proposal is permitted.
LRM Planning on behalf of Hallam Land Management Ltd	The prospect of clear community support being realised for new housing not allocated in the development plan is unlikely. Indeed, the weight this criteria would attract in determining such applications would be a reason for those opposed to a new development proposal to discourage any degree of community support. This criterion affords undue weight to the view of local objectors regardless of the merits of any individual scheme and compliance with the three preceding criteria. That is an unfortunate	<p>The application of this criterion, like the others will be a planning judgement taking all elements of the SPD and approved development plan and national planning policy into consideration.</p> <p>The SPS responds to Policy CP10 and it is not considered necessary to refer to every policy in the JCS which would still apply to development proposals where relevant.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>and unintended consequence of the way the Policy is written when it is applied in the occurrences that the SPD foresees.</p> <p>The SPD should be amended to allow full weight to be placed on Policy CP1 'Presumption in Favour of Sustainable Development' in accordance with para 38 NPPF to give certainty to the SPD.</p>	
Barton Willmore (Stantec) on behalf of Reside Developments Ltd.	The requirements of the SPD are not definitive and do not 'Establish the agreed process to be applied to applications...'. The SPD sets out the Council's non statutory policy position.	The SPD expands and explains the four criteria referred to in Policy CP10, being SPD it will not become part of the statutory development plan on adoption.
Advoco Planning	<p>Both the development and the process of agreeing the community mandate for a proposal should be locally devised and simply verified by the LPA. The LPA must play a key role in advising Parishes and other stakeholders of their role in the process. CP10 should be wholly reliant on the production of a joint statement between developer and key stakeholders, which in most cases would be a Parish Council. This should be prepared between the two parties and should specifically capture the points referred to in bullets 1-3. Support must have the input of a recognised and established local body. In short, the application of CP10 should be simple, community led, responsive and able to deliver developments that have a clear and compelling community mandate.</p>	<p>The criterion already requires the process of seeking community support to be agreed by the Council in consultation with the parish or town council.</p> <p>The SPD is clear in that it states the Council does not wish to prescribe the content or form of engagement – this gives discretion to the actual details.</p> <p>Agree that the application of this part of CP10 should be simple, community led, responsive and able to deliver developments that have a clear and compelling community mandate.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
Falcon Developments	<p>If there is a neighbourhood plan in place, whilst this does not prevent further housing coming forward, the SPD is not clear as to what weight should be given to additional schemes brought forward.</p> <p>The expectation that a new housing development can secure 'community support' when it is not allocated as part of the Local Plan is on the whole not achievable and should be rewritten or removed. This 'test' will lead to planning by Appeal.</p>	<p>The criterion already requires the process of seeking community support and therefore this element forms part of adopted policy and therefore cannot be deleted from CP10.</p>
Individual	<p>Any surveys executed to show/demonstrate community support should be carried out by independent experts that have been approved by the Council and they should continue to be financed by the applicant. If questionnaires are to be used, then they should cover a more wide-ranging list of questions than are currently used, and the text adjusted to reflect this.</p>	<p>The SPD is clear in that it states the Council does not wish to prescribe the content or form of engagement – this gives discretion to the actual details.</p>
Luken Beck on behalf of Bloor Homes Ltd.	<p>The two stage consultation process would add significant cost and delay. While the SPD may set out the Council's preferred scope of engagement planning decisions can not be properly based on the success of/failure to respond to local consensus.</p> <p>The Council should reconsider key aspects of the SPD, and should not base its position on development outside settlement boundaries on a policy that is 8 years old and that would not be compliant with national planning policy in the event of a housing supply shortfall. The Council should take a</p>	<p>The latest SCI adopted December 2021 includes guidance on planning applications and sets the expectations for engagement on these.</p> <p>See above response and recommended change The comments in relation to the age of the JCS are noted and the Council is in the process of preparing a new local plan, which will provide the opportunity to review all policies and the Council's approach to new development.</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	<p>positive approach with developers to meeting any shortfall in housing land supply, for example by prioritising sites already assessed through existing evidence (e.g. Land Availability Assessment) and emerging draft policies. It should set out guidance on the criteria the Council will typically rely on in assessing residential developments outside of the settlement boundary, such as their spatial characteristics, proximity to services, access to public transport and capacity to reinforce the vitality of local communities.</p>	
<p>Woolf Bond Planning on behalf of Barratt David Wilson Homes</p>	<p>Strongly recommend to not use this criteria, as it will result in under delivery and not truly meet local housing needs. As noted those completing Neighbourhood Plans are the people who (likely) already live in a home and does not consider future migration into villages or existing, future (younger peoples) housing need.</p>	<p>Comment noted – however this criteria already exists as part of Policy CP10.</p>
<p>RPS on behalf of land owners in Ropley</p>	<p>The purpose of this requirement is clearly to discourage any schemes that are unlikely to secure support from local residents and parish councillors. Even small edge of village affordable housing schemes will struggle to get unconditional support from both local residents and parish councillors. It seems to be a good way of effectively ensuring that no development ever actually takes place that isn't allocated in a development plan</p>	<p>Policy CP10 already requires the process of seeking community support and therefore this element forms part of adopted policy and would need to be satisfied in the event of a suitable scheme coming forward.</p>
<p>East Meon PC</p>	<p>Should consult with neighbouring parishes on developments that may have an impact on communities outside of the parish – particularly any</p>	<p>Parish Councils have access to weekly planning lists so can determine for themselves which proposals</p>

Respondent	Summary of Representation	Officer Comment and Recommended Action
	development in Clanfield and its impact on East Meon.	they may wish to comment on, if they have not already been directly consulted.
Individual	It is considered that the ability to constructively engage with the local community for ad hoc or one off development outside of a settlement policy boundary would be difficult. very high risk that developers could force new sites through to acceptance without suitable engagement and consideration.	That is the purpose of this part of the SPD to establish some guidance to aid consideration of proposals outside of settlement boundaries. See above response and Recommended Change
Alton TC	Concerns 1) How clear community support is evidenced or how it can be mitigated if not obtained or set aside - which we have seen before with viability assessments. 2) That the policy purports to give significant weight to site allocations in NPs but presumably if more than 2 years old an inspector would not agree with this. 3) The words "establishes the agreed process to be applied to applications for the release of land outside of settlement boundaries for housing purposes under Policy CP10" - creates a policy to permit development which didn't exist before and contrary to CP19	<ol style="list-style-type: none"> 1. The engagement and subsequent evidence submitted will ultimately be a planning judgement as to its acceptability in decision making. 2. The weight given the any made neighbourhood plans will depend on when they were made and whether or not they include site allocations as per Para 14 of NPPF. 3. Policy CP10 has always included the criteria listed and subject to this SPD and does not introduce new policy.
Individual	The proposed sites around Four Marks and Medstead received considerable community objection last time.	Noted.