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Large Sites Consultation-response by Alice Holt Community Forum

[Redacted]

Fri 11/10/2019 18:26

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (31 KB)

Response to EHDC Large Sites consultation.doc;

Large Sites Consultation

I attach the response to the consultation by the Alice Holt Community Forum.

[Redacted]

Chairman, Alice Holt Community Forum.

Alice Holt Community Forum

Response to East Hampshire Draft Local Plan Large Development Sites Consultation Land at Northbrook Park, Bentley Parish

Introduction

The Alice Holt Community Forum consists of representatives from each of the parish councils, communities and villages that surround Alice Holt Forest (the “community members”), the Forestry Commission and the South Downs National Park Authority (the Forest being within the South Downs National Park). Its members have considerable cumulative knowledge of Alice Holt Forest and the surrounding area. The objective of the Forum is to provide an efficient means whereby the Forestry Commission and the local community can exchange views on matters relating to Alice Holt Forest, both through regular meetings and informally, thereby informing the management of the Forest.

The views expressed below are the collective views of the community members of the Forum. (“the Forum”).

Landscape

The Northbrook Park site is a predominantly greenfield site in the middle of attractive unspoilt open countryside adjoining Alice Holt Forest, the River Wey and its floodplains, situated in the countryside between the historic town of Farnham in Surrey/Waverley and Bentley, the nearest village in East Hampshire. The Forum considers that the proposed development of the land, particularly the commercial site to the south of the A31, will not conserve or enhance the setting of the National Park or of Alice Holt Forest; and that it would be damaging to the overall character, quality, tranquillity and appearance of the landscape and countryside between Farnham and Bentley and thus to the setting of the National Park and Alice Holt Forest. It would cause light and noise pollution to a dark and tranquil area. This is a “valued landscape” and NPPF para 170(a) requires that the planning system and decisions should contribute to and enhance the natural landscape by protecting and enhancing “valued” landscapes,

We note that the East Hampshire Landscape Character Assessment states that the overall management objective for the LCA within which the site sits is “to conserve the tranquil, natural character of the Northern Wey Valley, and the individual identity of the small villages set on the gravel terrace above the floodplain. The valley should provide an open rural landscape between the towns of Alton and Farnham. The character of the enclosing valley sides, particularly the downland to the north of the Wey, which form the backdrop to the valley, should also be conserved.” The Forum agrees with that objective but cannot see how the proposed development could be consistent with it.

The Forum supports the decision of Waverley Borough Council to rule out development proposed for the part of the site in Waverley Borough.

Biodiversity

The Forum is particularly concerned with that part of the site in the River Wey flood meadows to the south of the A31 right up to the edge of Holt Pound Inclosure in the Forest. Alice Holt Forest is ancient woodland and Site of Importance for Nature Conservation and it is well recognised that

ancient woodland requires appropriate semi natural adjoining buffer zones. The River Wey and its flood plains are also important for biodiversity and are the subject of biodiversity improvement plans. The flood meadows also play an important role in flood defence, as illustrated in the SFRAs. The Northern Wey floodplain is Biodiversity Opportunity Area 17 and forms part of the Local Ecological Network for Hampshire, also part of the EHDC Green Infrastructure Strategy. The impact on biodiversity connectivity would be systemic affecting the ecological network and the delivery of eco-services as a whole. It must be clear that no net gain in biodiversity could be achieved as required by the NPPF. The area south of the A31 leading down to and across the River Wey should be protected and not built on.

Traffic

The traffic impact of such a development on the roads in the surrounding areas, especially the Farnham By-pass and Wrecclesham would be severe. There is also likely to be a serious impact on traffic around Bentley. It would certainly lead to increased traffic congestion to Farnham, as most of the additional traffic would be along the A31 towards Farnham, which is already overloaded at peak times and will be worse once the development at Bordon Whitehill is completed.

Sustainability

The Forum questions the sustainability of the proposed development, being located in open countryside with few nearby facilities or infrastructure, particularly having regard to the serious environmental damage likely to be caused. The site is unlikely to be able to provide the necessary infrastructure, such as schools, shops and medical facilities.

Conclusion

The Forum considers that the site at Northbrook Park is totally unsuitable as a Large Development Site for the reasons set out above and that it should be removed from the list of possible sites.


Chairman

ALICE HOLT COMMUNITY FORUM

11th October 2019

Large Sites Consultation: response on behalf of Alton Ramblers Group.

[Redacted]

Fri 04/10/2019 09:40

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (29 KB)

EHDC Large Area Sites Consultation-Alton Ramblers.docx;

Dear Sir/Madam, As Chairman of the Alton Ramblers Group, I am attaching the response of Alton Ramblers Group to this Large Sites Consultation. We have commented on 7 of the 10 sites, since our walks cover all of these areas. Other Ramblers groups cover the other three sites.

We trust you will note our comments on each site accordingly. Please note virtually all of our members reside in Alton and surrounding villages, within the EHDC area. I myself reside in Four Marks.

[Redacted] Chairman of Alton Ramblers Group.

[Redacted]

email reply to

[Redacted]



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Introduction

As Chair of the local branch of the charity Ramblers England, Alton Ramblers Group, I feel duty bound to comment about the sites within our area. Our Group's purpose is to provide group walking trips and footpath maintenance in the Parishes of ALTON, BEECH, BENTLEY, BENTWORTH, BINSTED, CHAWTON, EAST TISTED, FARRINGDON, FOUR MARKS, FROYLE, KINGSLEY, LASHHAM, MEDSTEAD, NEWTON VALANCE, ROPLEY, SELBORNE, SHALDEN, WEST TISTED, WIELD and WORLDHAM. All the local footpaths within the parishes mentioned above are used by Alton Ramblers Group and as stated, we also assist in the maintenance of all these footpaths in cooperation and coordination with Hampshire County Council Countryside Service and various local Parish Councils. These footpaths are vital to Alton and other local residents to enable them to be walking for their health, recreation, and physical and mental well-being.

We are also actively supporting other initiatives within the Alton Area, namely Walking for Health (partly financed by Ramblers England as well as EHDC), Walk Alton/Walkers are Welcome, Alton Active and we have close contacts with the local branch of British Horse Society. We actively support the annual Alton Walking Festival each May to encourage new walkers to get out and perhaps join a group such as Alton Ramblers Group. This is run by Alton Town Council.

As part of Ramblers England, we are deeply concerned about the impact of these large sites within East Hampshire. Ramblers are also deeply involved in campaigning for preserving the environment around footpaths to preserve a beautiful and natural landscape as people walk. Under the various Acts of Parliament, EHDC is duty bound to support, preserve and ensure every Public Right of Way path is preserved during and after any construction of housing etc.

Alton Ramblers would like to comment on each of the relevant sites in our area (Neatham Down; Chawton Park; Land South of Winchester Road, Four Marks; Four Marks South; Northbrook Park, South Medstead; Land West of Lymington Bottom, South Medstead) in the following pages. While we will restrict our comments to the general walking environment (visual effects in the main) impact and on footpath impact per se, there are numerous other factors (traffic, access) that peripherally affect walkers, but we do not comment on these except where they are overwhelming to the walking experience. Alton Ramblers will leave detailed planning-related comments to other parties.

EHDC Large Area Sites Consultation, Sept-Oct 2019

Comment on Behalf of Alton Ramblers Group

1) Neatham Down

Comment type: OBJECT

Comment:

General impact to the area: This development is essentially a greenfield site in a sensitive natural area. Neatham Down is just that- a valuable chalk Down, visible from most of Alton. This site and indeed the whole of Copt Hill, Neatham Down, Golden Chair Hill and Lynch Hill are particularly beautiful and peaceful (undeveloped) areas close to town for locals to walk and observe the views of Alton and beyond to Shalden, and to the South to Worldham and the SDNP itself. The Hangers Way is barely 0.5 km from the southern edge of the site. The walk along the ProW from A31 roundabout towards East Worldham is therapeutically beautiful, even if downwind of the Alton Sewage Works. The site is close to the upper reaches of the River Wey, to Neatham Mill and Manor, and all the associated paths and access points. Thus from a sheer "preservation" point of view, this Neatham Down development would be insensitive, and destructive to the local Alton area in general (severe loss of amenity).

The site is south of the A31, divorced from the rest of the town and so would become an isolated development if built. But, the site is high above the town, so it will be highly visible from Alton Town centre, B3004 Caker's Lane/Mill Lane, the A31 (especially while driving east towards the Holybourne roundabout), the railway (including the Watercress line), St Swithin's way path (002/29a/2 etc), Anstey Park and from Treloar College and hence will lend too much weight of ugliness to the town. There are surely better sites to choose than this one- indeed Alton is by now sinking under masses of actual or imminent development in other sites in any case. Do we really need so many houses in this town, where employment is short, schools and so on are stretched and the single track line to London is overcrowded, access to A31/A339 are poor to name but a few of the local issues?

We would also be concerned that to select this site south of the A31 will open up all kinds of new proposals from sites south of the A31 such as Truncheants, Westbook Grange etc., leaving Alton a large town, but with A31 cutting through its heart- hardly good for integration and cohesion of the community. Best not to start the precedent at all, in our view. We object to this development on purely general impact on the environment.

Footpath considerations: In respect of footpaths, we see the worst impact to footpath 020/1/1 which skims the southern edge of the site. Even though the plan shows much green space, the reality is that a walker on this path would look DOWN on many houses and their rooflines would

obscure views of said green spaces and also over to Alton itself. The site is in fact a small "bowl" shape with footpath 020/1/1 running along the rim of the bowl. The view from this path will be a panoramic one, but of houses, not fields.

We would welcome the "official" opening up of the path joining footpath 020/1/1 to footpath 020/3/1 further east; this is an unofficial track and to "legalise" it is welcome. But that could be done at any time independent of any building plans!!

Also, indeed, (finally) the opening up of the path and bridge at Golden Chair Farm over the A31 to link to footpath 020/2/2 at the bottom of Waterbrook Road is welcome, so that then there would be multiple loops one can make for circular walks of high quality around the area- notwithstanding the hideous view from 020/1/1 itself (see above). But again, that could be done at any time independent of any building plans!! However if the Lynch Hill area is developed for industrial use, this latter path might not prove to be so popular.

We note too that the southern edge of the site includes a new cycle track, presumably this can double as a new footpath looping round these hillsides, but again the view over the whole rooflines of the site will be shocking. As long as that path is accessible from the public footpath at the south-eastern corner of the site- this new track would be a welcome addition to the footpath network in the area.

Because the site extends so far south-west, towards Neatham Down itself, there will be significant impact on footpaths 259/32/3 going south-east towards Worldham and to 259/31/1 which is the Hanger's Way itself. Both paths will be able to see the rooflines of multiple houses near the edge of the site (loss of amenity). We can also foresee that all the dog walkers from the 600+ houses in the site will use all these local paths and the wear, erosion and damage will be severe. The Hangers Way walk might well be damaged irreparably, since it runs in the valley and is often in any case quite muddy.

Summary: Overall, then Alton Ramblers opposes this development on the grounds of unnecessary and irreparable damage to sensitive countryside, and likely severe impact on a range of local footpaths in this beautiful area. At a time when Alton needs to re-invigorate itself after various factory closures etc, this is far from the way. We would prefer development elsewhere. As a footnote, if the footpaths opened up by the site are opened anyhow, we would welcome that!

End of comment

EHDC Large Area Sites Consultation, Sept-Oct 2019

Comment on Behalf of Alton Ramblers Group

2) Chawton Park

COMMENT TYPE: OBJECT

Comment:

General Impact to the area: This site is a large site separated from the rest of Alton, so would not integrate well, and the transport links are poor along narrow roads (Chawton Park Road, Whitedown Lane) and the access to A31 via the railway bridge and Northfield Lane is preposterously over-capacity as it is, let alone with proposed traffic lights and additional 1200 houses worth (=2000) cars using the access point from Chawton roundabout every day. The long narrow nature of the site does make for good community cohesion either. The narrow valley here is going to flood also- right along the spinal access road. We cannot see good outcomes for the town of Alton as a whole. Building here would lead to severe isolation and traffic and access issues. Currently, the area is a quiet haven from the A31 traffic noise being sheltered behind the railway, so it is good for family walks, cycle rides etc. This building proposal would therefore represent a severe loss of amenity for Alton residents. For these reasons, Alton Ramblers objects to this site proposal.

Footpath Impact: This is a peaceful area, with deer and sheep grazing and camping sites and a peaceful path 046/2/1 up to Chawton Park Wood, as well as a bridleway along the southern edge of the wood 046/4/1 (Peter Wykeham Way). The latter path is also the Pilgrim's Way, continuing along Chawton Park Road into Alton. <https://www.pilgrimswaycanterbury.org/the-way/>. This path 046/4/1 is particularly impacted by the proposed bus standing and tightly bending access road crossing it- so the full 1200-houses worth of traffic will be crossing here, so walkers and riders are exposed. These paths must also be linked safely to the other path 046/1/1 going north-west into Bushy Leaze Wood and to Mounters Lane. This will surely require a pedestrian/equine crossing light system. All these paths, linking further west, to forest tracks within Chawton Park Woods are extensively used by cyclists, walkers, and athletes. Path 046/2/1 is even a commuter cycling route for Four Marks and Medstead residents going to Alton. The woods will also get extra use from the new residents for dog walking, and leisure- the extra wear on paths and surfaces needs to be taken account of and Forestry Commission informed. It is vital that these pathways, Pilgrim's Way, Peter Wykeham Way and the Chawton Park Road itself are preserved and protected. Since the interaction with the larger amounts of traffic have not been adequately addressed, and this is fundamentally about the shape and position of the proposed site and cannot be overcome, we object to this proposal. End of Comment.

3) Land South of Winchester Road

COMMENT TYPE: OBJECT

Comment:

General Impact to the Area: This site is a virgin greenfield site, in a very sensitive area of outstanding natural beauty, even if not in the SDNP itself. It is also prime agricultural land vital for growing food. The paths adjoining it and crossing the site offer unsurpassed views of Cheesefoot Head and Winchester. It is also within a range of hills and escarpment, reminiscent of the Hangers slightly to the east in Hampshire. Further south in this escarpment is West Tisted within the SDNP. The site is an open field and any development would be extremely prominent and visible across much of the area. Indeed, the site would be a scar visible from the Watercress line along the entire length of track between Ropley station and the railway bridge over Grosvenor Road in Four Marks- 3 km of the entire 16 km of the line- the rural view ruined. The built environment would irrevocably detract from the extremely rural and beautiful scene over a wide area to the north, west and south of the site (loss of amenity).

A further issue would be the management of drainage of rain and surface water from the concrete built areas, since this site would inevitably drain into the chalk bedrock and hence into the environmentally sensitive river Alre, Itchen and then the Solent. It is well known (1908 OS Maps, for example) that the boundary of the river systems lies just to the eastern edge of this site- eastwards to the Wey and Thames, westwards to Itchen and Solent. Since this is the catchment area for the River Alre, which is itself a SSSI, then water pollution (from extreme rainfall etc) is an extremely sensitive issue for this site. Moreover, there is an Environment Agency river augmentation pumping station within the proposed SWR site, and mixing polluted run-off so close by with the water extracted will be an issue. The end result is that residual water would end up in the Alre and Itchen- a famous chalk stream river with excellent environmental credentials- essential for fishing and wildlife. EHDC must therefore hold on this building site until there are satisfactory and "guaranteed for 100 years" methods to mitigate (remove) all pollution (Environmental and Ecology).

This site is a ribbon development of Four Marks, hardly well-placed to cohere with Four marks village as it is now, with the total village length then almost matching that of Alton and Holybourne, but with negligible comparable infrastructure.

Thus from a sheer "preservation" point of view, this Winchester Road development would be crass, massively environmentally insensitive, and destructive to the local Ropley and Four Marks area in general. Alton Ramblers therefore vehemently objects to this proposal.

Footpath impact: This site has many important paths running across it or adjacent to it. First, the Pilgrim's Way runs up the entire length of Brislands Lane from Court Lane in Ropley, to Lymington Bottom in Four Marks. Thus views from Brislands Lane into the proposed site as you ascend the slope towards the phone antenna mast and then come alongside the site would be severely impacted; this is hardly good walking for pilgrims and other walkers. The loss of the view from top of Brislands Lane towards Cheesefoot Head in the west would be a sad loss to humanity (loss of amenity). Brislands Lane is a single track road, with no pavements but has small amounts of traffic. It is used by many local walkers and athletes, cyclists etc. It is vital that EHDC PROHIBIT any construction or resident traffic from the SWR site to use Brislands Lane, right from the start. BOATs Green Lane (091/21/1), Barn Lane (091/20/1 and 091/20/2) and 199/41/1 all border the various parts of the proposed site. In particular, footpath 091/20/2 will be crossed by the main access road into the main part of the SWR site from the "Barn Lane" section so there will need to be adequate traffic control measures installed. Footpath 199/14/1 crosses the main site down 30m of elevation to The Shant and this again must be preserved in the site if it were ever built. It is not clear on the site proposal maps whether any kind of link from south side of A31 to north side to enable people to get to the employment areas etc is to be provided.

An additional factor is that the Old Down Wood lies less than 50 m from the site boundary and would be easily accessible via path 199/15/1 to all the new residents for walking and dog-walking etc. Old Down Wood is ancient woodland, and the St Swithin's Way 199/16/3 to 199/16/5 passes through it slightly further south of the proposed site. Such large number of new users will severely damage the wood and its environs.

In summary, all the paths in the vicinity of the SWR proposal are sensitive and important useful walks for local residents looking after their physical and mental health and all would be degraded by this site being built (loss of amenity).

For all these footpath impact issues, Alton Ramblers cannot support this proposed development and is therefore vehemently objecting to the plan.

End of Comment.

4) Four Marks South

COMMENT TYPE: OBJECT

Comment:

General impact to the area: This proposal has numerous issues related to the sheer volume of residents so close to and yet not connected to the village centre. Traffic and so on will be vastly increased on all the rural lanes edging the site (Alton Lane, Blackberry Lane, Telegraph Lane). Blackberry Lane forms the Pilgrim's Way, and Alton Lane forms the St Swithin's Way from Garthowen Garden Centre to Weathermore Lane. Telegraph Lane towards A31 is an important walking route linking the St Swithin's Way to Chawton Park Woods. Hence increasing the traffic coupled with the overall urbanisation of the area with this big development will severely reduce the appeal to walkers using the local paths.

Alton Ramblers see the Four Marks South development as a massive increase in urban character for Four Marks, making the village on a par with Alresford and even Alton for sheer urban sprawl and this is adversely impact footpaths and leisure activities in the area.

Footpath Impact: There is one footpath crossing the site, 091/6/1, and this must be preserved and improved to cope with the higher foot traffic. The new residents of Four Marks South would likely use this path to walk their dogs etc moving southwards towards Kitwood and Hawthorn Plantations. All the local paths south of Garthowen (091/7/2 etc) will suffer more foot traffic and increased erosion and damage- requiring more frequent maintenance by on behalf of HCC Countryside Service. Alton Ramblers have reservations that the pleasant un-crowded character of these various paths will be impacted (loss of amenity) and therefore objects to this proposal on footpath impact.

End of Comment.

EHDC Large Area Sites Consultation, Sept-Oct 2019

Comment on Behalf of Alton Ramblers Group

5) Northbrook Park

COMMENT TYPE: NEUTRAL

Comment:

General Impact to the area: Northbrook Park has the unassailable advantage that it is an isolated site, with few environmentally sensitive local features nearby. The exception is the natural flood plain, near the river, which should be left "as is" as much as possible, and not "over landscaped" or "prettified". The site must take account of the likelihood of regular surface flooding for weeks of the year south of the A31 and minimising damage or pollution to the River Wey. With these significant reservations, Alton Ramblers does not object to this site.

Footpath impact: several paths skirt the edges of the proposed site: bridleway 071/5/1, 020/66/1 and 020/53/1 the other side of the railway bridge at Holt Wood Farm. These are likely to be fully retained and little impacted, with the exception that increased population nearby will mean increased foot traffic. However, much of that would be dog walkers who would have to cross the A31 bridge. One path crosses the site from A31 south to join Holtwood railway bridge, 017/22/1, which appears to be an intended track or road on the southern part of the proposed site. However it does pass through the industrial area and must be preserved during and after construction. There is a lack of a foot bridge over the A31 near the footpath 017/22/1, so a long deviation of the route is needed to reach and use the proposed footbridge further west and no paths are indicated to reach the bridge.. Given that if a new roundabout is installed, negotiating the dual carriageway would be much harder than now, most walkers would need to opt for this bridge and take the extra time. Paths must be laid to connect to the bridge.

One good feature of the site is that existing paths are not close to the housing or with the exception of 017/22/1, near much built environment.

Alton Ramblers does not therefore consider the footpath impact to be severe, but nevertheless these paths will suffer to an extent. With these reservations, Alton Ramblers does not object to this site.

End of Comment.

6) South Medstead

COMMENT TYPE: OBJECT

Comment:

General Impact on the area: This site looks like a massive "in-fill" of housing on land that is pleasant farmland and open fields, close to the village and accessed by roads and footpaths. Access points to all the parts of the site are impinging on these paths. The walking experience along these paths will be reduced in quality, with noise, buildings and lack of green scenery. The site will make the local area look much more urban. For these reasons, Alton Ramblers objects to this site.

Footpath Impact: Stony Lane, Footpath 155/31/1 and 155/31/2 will run between two sections of the development and will have to be maintained to allow vehicular access to the houses down the Lane. However, the walk will be within a new development in effect, far from the rural character of the present. Footpaths 155/32/1 and 155/32/2 (Beachlands Road), 155/33/1 (Boyneswood lane) would all be affected, but likely remain open and accessible. Another factor is the increased volume of users, accessing proposed local facilities and schools, as well as dog walkers. All this will lead to increased volume of foot traffic and a level of urbanisation. The footpaths simply run too close to the housing to be anything like acceptable loss of amenity, so Alton Ramblers cannot support this site.

End of Comment.

EHDC Large Area Sites Consultation, Sept-Oct 2019

Comment on Behalf of Alton Ramblers Group

7) Land West of Lymington Bottom Road, South Medstead

COMMENT TYPE: OBJECT

Comment:

General Impact on the Area: There are few benefits of this site to the village and the walking experience along Lymington Bottom Road in particular. Lymington Bottom Road is an important link to walk to Medstead from Four Marks and to then join footpath 155/19/1 and 155/18/1 further north. Increased traffic flow and construction going on for 10 years will severely degrade this route for vehicles and pedestrians alike.

Alton Ramblers does not support this site proposal for this reason.

Footpath Impact: There are no footpaths in the vicinity or that cross the proposed site. Impact to other paths in Medstead area will be minimal. There is an opportunity to make a new path to take walkers away from Lymington Bottom Road and go through the proposed site to link to footpaths 155//19/1 in the North, and to Station Approach at the south (to then link further east in the village. We would urge EHDC to insist on any development to take in this opportunity. However, we remain opposed to the proposal overall.

End of Comment.

Response to the EHDC Large Development Sites consultation

Alton Society [REDACTED]

Wed 09/10/2019 13:42

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

[REDACTED] townclerk_at_alton.gov.uk <townclerk@alton.gov.uk>;
[REDACTED]

📎 1 attachments (1 MB)

Large Development Sites Consultation - Alton Society's Combined Response.pdf;

From the Alton Society

Dear sirs,

Thank you for the opportunity to comment as part of this consultation exercise. Attached is our full response.

Yours,

[REDACTED] (for The Alton Society)



EHDC Large Development Sites Consultation – Sept/Oct 2019

Our Response

We have chosen to comment in detail only on the two sites in close proximity to Alton: Neatham Down and Chawton Park Farm. But firstly, some general observations on others of particular significance to the town:-

The Four Marks sites

Most, if not all, of the Four Marks sites seem to be piece-meal additions to what is already a rapidly expanding village. Like Alton, we feel that Four Marks is already taking more than its fair share of new development, and needs time to develop a proper infrastructure of supporting facilities and services, without the burden of still more housing. Most of the suggested schemes are just crude, unsustainable forms of infill, (eg South Medstead); others, such as Four Marks South and Land South of Winchester Road, would have a severe impact on the visual quality of the landscape on the edges of the village, and change the character of its setting significantly. We would therefore object to any of these sites going forward.

Northbrook Farm

Whilst this scheme, unlike all the others, has the merit of establishing a genuinely new, independent settlement, with its own identity and infrastructure, the landscape impact is considerable: it would create a damaging interruption to what is a pleasant, continuously rural belt of countryside, straddling the Wey Valley for the entire stretch between Farnham and Alton, for example when viewed from the main railway line. We would therefore object to this site progressing any further.

Whitehill & Bordon

Of all the sites, the potential for expanding Whitehill & Bordon in the way described seems the most appropriate. With the HPA already at an advanced stage, it is clear that there is potential for absorbing the extra 1284 dwellings envisaged.

Indeed, Part 1 of the Sustainability Assessment (SA) accepts that:

“New supporting infrastructure would complement the key infrastructure that is being provided as part of the existing regeneration proposals”.

We would therefore fully support the prospect of this scheme proceeding to the next stage.

Neatham Down

Geographic Location

Above all, and regardless of the huge impact any development of this site would have on the local landscape (see below), creating a new settlement on the south-east side of the Alton by-pass would establish a major precedent, given the importance of Alton's setting (and containment) in the River Wey valley on the north-west side of the by-pass.

Being physically detached from Alton (or any other settlement), with the A31 representing a major barrier, the site would effectively be isolated from existing services and facilities, without the ability to be self-sustaining in terms of its own facilities and infrastructure. Any improvements to transport links would do little to mitigate this. [See para 72 part a) of the NPPF]. Part b) of paragraph 72 suggests that:

“large-scale development sites should be of a size and in a location that would support a sustainable community, with access to services and employment opportunities”.

We simply don't believe Neatham Down can achieve this. In any case we note that this site (LAA/AL-017) was rejected as 'undevelopable' in the EHDC LAA dated Dec 2018.

Landscape

For us, this is the single most critical issue. Firstly, can we make two observations:

1. Whilst there are general statements in the SA about landscape and visual impacts of developing close to the A31 on the northern fringes of Alton, we are puzzled, and surprised, to find no specific mention of this particular site.
2. It seems extraordinary that landscape value itself is not one of the tests applied at either Stages 1 or 2 of the Site Assessments, given the requirement of NPPF para 170(a). There is no doubt in our view that the potential damage to the local landscape and risk to rural vistas in and around the respective sites MUST be a determining factor in assessing a site's suitability.

With this in mind, we take the view that development on this very exposed stretch of rolling landscape must not be allowed. The site is clearly visible from Cakers Lane and Hangers Way, and (further afield) from large areas in the north part of Alton, Holybourne, and no doubt from some of the outer villages. It is on rising land that forms part of the critically important 'green rim' of the natural bowl in which Alton sits, and its development would cause significant damage to the town's skyline.

We agree entirely with the detailed Landscape Character Assessment conducted by CPRE, in which they conclude:

“...This tract of landscape, which includes the Site, is a 'Valued Landscape' to which NPPF paragraph 170(a) applies.

- *the scenic quality and unspoilt character of this undeveloped tract of landscape of great natural beauty, with its open views and strong sense of tranquillity,*
- *the high quality of the public experience of this landscape,*
- *the significant contribution to the landscape character areas identified in HILCA and EHLCA” .*

It is also clear that EHDC accepts the sensitivity of this hillside location in landscape terms. The SA background paper states:

“The Council’s evidence suggests that the capacity of the wider landscape to accommodate new development is low, given the constraints of its rural character and its importance as the valley of the River Wey”.

If the need to protect our countryside means anything at all we must leave this attractive hillside alone.

Pollution

The unsuitability of the site is underlined by the fact that, even with adequate visual screening, the noise and air pollution from continuous traffic on the A31 would be considerable and persistent, made worse by the fact that the hillside slopes down to the by-pass.

Access

The local facilities envisaged for this development do not alter the fact that such a development would remain heavily dependent on Alton itself for local community, retail and other services, and therefore result in an unwelcome increase in the number of car journeys. A village shop and a pub (and even a new primary school) would not make this site sustainable. The walking distances to Alton’s shops (1 to 2km) is totally unrealistic for most people.

We also believe that the proposed pedestrian and cycle links into the town (across the A31) are unrealistic in terms of road safety, viz the dangerous prospect of pedestrians having to cross a possible entrance into the proposed Lynch Hill employment site. Meanwhile, the increase in congestion, being so close to the Holybourne roundabout, and at a time when traffic volumes in this locality are increasing significantly (from the new housing developments in Anstey), would be unacceptable. It is worth noting that the WS Atkins Alton Traffic Survey of March 2015 already recognised the Montecchio Rd/Mill Lane junction as an over-capacity hotspot.

Flood Risk

In the SA background paper we are told that:

“... approximately 44% of the site is affected by groundwater flood risk to the surface. There is no quantification of the risks from groundwater flooding (meaning that no probability can be associated with a potential flood event); but the impacts of flooding to the surface can be severe, with floodwater remaining over a period of months. Further technical work would be required to understand more about this and other sources of flood risk. The development potential of the site could be reduced as a result of this work, but at this early stage it is unclear of the extent to which the potential is likely to be reduced, if at all”.

Also, in the Red assessment at Stage 2:

“Large areas identified ... for housing development could be affected... the impacts of this source of flooding can be severe: flooding can last several months”.

For all the above reasons we strongly object to this site going forward.

Chawton Park Farm

General Comment on this Location

This is a site of some 87 ha (about 215 acres) 1.5km west of Alton Town Centre. The proposal is for 1200 homes and a local centre (pub, shop, community centre, employment space), primary school, playing pitches and allotments.

The proposed employment site in the Draft Local Plan (LAA-CHA-002 SA24 – Land Adjoining Northfield Lane, Alton) is in close proximity, as well as a site the other side of Northfield Lane (LAA-CHA-006) which has not yet been proposed for consultation but appears in the Interim SA Report December 2018, a document on which the EHDC Large Sites Background Document (LSBD) is based.

This site is within 1km of the recently approved Lord Mayor Treloars Hospital application for 280 homes (LMTH) which will take 5 years to build once it starts. The 1200 homes on the proposed CPF site have a build rate of about 109 a year over 11 years. This would mean blight and major disruption for the current residents in this area of Alton for the next 15 years at least, which is unthinkable.

A proposal that potentially 3500 people and associated cars, litter, services, traffic, air pollution should be shoe-horned into a precious rural space between two Ancient Woodlands is surely preposterous.

We also note with concern, that despite it having received four Red 'results' in the Stage Two process, it still forms part of this Consultation.

Valued Landscape Impact

We would like to remind you of the NPPF para 170 a) concerning Valued Landscapes. This is a paragraph that CPRE confirm applies to this site i.e. it can be defined as a 'Valued Landscape' taking account of

- the distinctive character of this undeveloped valley of great natural beauty, with its strong historic resonance and tranquillity,
- the high quality of the public experience of this landscape, especially from the bridleway running in the valley bottom, and
- the significant contribution to the landscape character areas identified in HILCA and EHLCA

They go on to conclude that: "Clearly, allocation of the Site for housing would destroy its peaceful rural character and tranquillity by introducing visually intrusive development, with accompanying lighting and noise, up the valley sides, ruining the outstanding public experience of this landscape from the bridleway on the valley floor. This high quality countryside experience would no longer be available to residents of nearby Alton."

CPRE finish by reminding us that "NPPF para 170(a) requires that the planning system and decisions should contribute to and enhance the natural landscape by protecting and enhancing "valued" landscapes.", and further advise that 'In interpreting this provision it is now accepted by the Court and Inspectors on appeal that classification as a "valued" landscape indicates development should be restricted on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused.'

Proximity of SDNP & Chawton Village Conservation Area

The comment on page 63 of the LSBP referring to this site's proximity to the SDNP says 'the wider area is undeveloped with expectations of Scenic Beauty'.

This point is emphasised by the LSBP Stage Two constraint which shows Amber for the National Park proximity. The site is only 250m away from the South Downs National Park (SDNP). We note with unease the Consultants' statement that the Amber result is a 'key concern', and further that the 'Council's Landscape Capacity Study advises that the local area should remain generally undeveloped'.

It is just not feasible or acceptable to accept a proposal to offset the disturbance to this area by providing 'supporting/connecting green infrastructure between' these SINCS as an element of justification for a development of this size and nature.

In summary, to juxtapose this development with, not only the SDNP, but also the conservation area of the Village of Chawton would be completely irresponsible for so many reasons which together would contribute to a degradation of the beauty and amenity of this rural area.

Wellbeing & Green Infrastructure

We would submit that these two woods and 'improved grassland' in between, function as Alton's green lungs and as a gateway to green infrastructure and opportunities for exercise and wellbeing. The National Cycle Network path 224 co-exists with a bridleway through this landscape. Currently residents of Alton can reach this rural area not far away from their town, and benefit from walking, cycling and horse riding through this landscape. They should not be subjected to such a devastating invasion of one of their prized wilder, but accessible areas for exercise and wellbeing.

Ancient Woodland Sites and Sincs

It will be visually and ecologically abhorrent to build houses so close to Bushy Leaze and Chawton Park Wood, both Ancient Woodland sites and SINCS. The impact of development here could severely undermine the ecological viability of these woods due to a massive recreational increase in visitors. Page 61 of the Sustainability Interim Report 2018 notes the 'potential for increased recreational/ development-related disturbance on large parcels of ancient woodland in this area.' i.e. such close proximity to Ancient Woodland of c3500 people has the potential to severely disrupt the habitat of the flora and fauna in these woods.

Access and Traffic Impact

There is no data provided on the increase in car journeys associated with an additional 1200 homes but road traffic volumes will surely be overwhelming for:

- a) the one, narrow, local road (Chawton Park Road – [CPR]) which would need widening thereby destroying hedgerows which provide a vital corridor habitat for wildlife and are in severe decline – 50% having been lost between 1950 and 2007. The very fact that the Hedgerow Regulations Act exists, speaks for this fact.
- b) the railway bridge, which is, and will be a pinch point engendering traffic queues down Northfield Lane to the A31 despite what the Consultants said about traffic sensor management.
- c) CPR going east past residential parked cars. Currently we have a taste of how dangerous it is along this stretch because of the increase in cars due to the current Butts Bridge closure.

Once the Butts Bridge is re-opened it will be virtually impossible to turn right onto the A339 from CPR, even before taking into account the extra traffic from the LMTH site, and CPF will simply make matters even worse. There is currently no solution in sight for this junction. WS Atkins Alton Traffic Survey of March 2015 already recognised the Whitedown Lane / CPR junction as an over-capacity hotspot. (see page 3 *Mill Lane/Montecchio Way junction in relation to Neatham Down*).

Listed Chawton Farmhouse

One of the Stage Two constraints is ‘impact from development on Listed Chawton Park Farmhouse’. We do not agree that saying there are ‘likely to be’ opportunities to avoid adverse impacts on this, taken with the statement on page 64 that says ‘this area is envisaged as a new Local Centre where higher density development might be anticipated’, is in anyway a strong enough guarantee for the creation of a suitable environment commensurate with the listed status of this building. We read that a heritage assessment has been undertaken on behalf of the Site Promoter but note with concern that this is not yet available for public comment.

LSBD Red Results and Constraints

We would point out that the unsuitability of this site is underlined by the number of warnings to be found in the LSBD, with which we strongly concur. For example, CPF attracts four Red ‘results’ in the Stage Two process which are:

- within 50m of Ancient Woodland
- within 100m of a SINC
- within 50m of Listed Building
- 1.5km from Alton Town Centre.

And it lists three Stage Two Constraints:

- Suitability of delivering Net Gain in Biodiversity
- Impacts from Development on Listed Chawton Park Farmhouse
- Suitability of Large Scale Developments in terms of landscape impacts

Finally we read that EHDC has requested 'further information on environmental and infrastructural constraints' from partners* to help it understand more about how to make the development of a large development site acceptable in planning terms. We request that any information provided be made available to the public once received.

**(Natural England, Historic England, The Environment Agency, other local planning authorities and infrastructure/service providers [SDNP Authority, Thames Water are listed in Table 10])*

Conclusion

For all the reasons given above we strongly OBJECT to this proposed development going ahead. Furthermore we would suggest that any development, ever, on this site would be completely incompatible with its ancient woodland history and the amenity it provides for the people of Alton and that EHDC should consider protecting it for future generations.

Large Sites Consultation

Alton Town Clerk <townclerk@alton.gov.uk>

Mon 14/10/2019 16:43

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (122 KB)

19.10.10 Local Plan..pdf;

Please find enclosed the response from Alton Town Council in respect of this consultation.

Kind Regards


 Town Clerk
 Alton Town Council
 Town Hall
 Market Square
 Alton GU34 1HD




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Market Square
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10th October 2019

Response to the Large Development Sites Consultation

Alton Town Council has responded to the proposed sites which directly impact the town, those being Neatham Farm and Chawton Park and will refrain from comment on other sites. The Council wishes to state however, that it had no significant objections to the site allocations put forward in the original draft local plan consultation held earlier this year. The suggested development of the Coors Brewery Site and the extension site to the Will Hall Farm site represented a fair allocation for the Town, given our requirement to take some level of additional housing but also mindful of the extensive housing development taking place across the town currently which will continue for up to a further 5 years. As such the two sites proposed here, at either end of the town, both outside of the settlement boundary and in the open countryside, represent inappropriate levels of urbanisation and growth of the town, stretching it further into protected and valued landscapes, which would irrevocably change the character of Alton.

The Town Council would also like to raise a concern over the methodology employed in the background paper considering the Site Assessment Criteria and Thresholds for Stage Two of the Site Assessment Process. Whilst the red, amber, green system on Table 8 give a clear indication of constraints, the weight given to each criteria would appear unclear. For example, the Neatham Farm site has the least number of red boxes, yet is clearly in terms of the constraints listed below, is one of the most unsuitable site for development.

Neatham Down

In addition to those noted in the EHDC report, we would wish to add the following constraints:

Location. Beyond the significant detrimental impact this development would create in the landscape, creating a new settlement on the south side of the A31, outside of the settlement boundary and remote from the rest of the town, would create an unacceptable precedent leading to further development, resulting in Alton straddling across both sides of the A31, ruining the placement and setting of Alton. Alton is a strong cohesive community and isolating new residents in this way without adequate infrastructure to be self-sustaining, is wholly inappropriate.

Pollution. In a time of heightened awareness of the impact of pollution on the health of the nation, locating a major development alongside a main A road, exposing residents to high levels of emissions from heavy goods vehicles and potentially within ½ mile of a recycling plant which it has been indicated may be developed into an Energy Recovery Facility, would seem nonsensical.

Highways. The road network into town from this junction of the A31 at peak times is already over capacity and this would only add to the congestion.

The site was rejected last year by the LPA and there has been no justification for subsequent approval to this stage of consultation.

The only point of merit in the entire proposal is the opening up of the bridge across the A31 for non-motorised traffic but this is de minimis when compared to the overall unsuitability of the site and therefore carries little weight.

Chawton Park

The report clearly indicated the following constraints on the site, which we would strongly agree with.

Landscape setting and capacity

Highway impact

Trees, woodland and ancient woodland

Heritage assets

Nature and ecological designations

In addition, we would wish to add the following:

Accessibility. The railway bridge over the road at Northfield Lane is very narrow as is the bend. The applicant has stated that the road could be widened but unless the bridge is to come down and land owned by Alton Town Council would need to be acquired to widen the road. We know that the bridge cannot accommodate more than the current levels of two way traffic, as demonstrated by the inability to run two way with traffic lights for the last 9 months with the diversion for the Butts Bridge closure as it was deemed to be dangerous. Additionally it is noted that there is no secondary access proposed to the site

Public Transport. The 64 bus service is a very tightly scheduled routing and it would seem unlikely that the service would divert to meet the public transport needs of the development.

Recreation. The site is less than 250m away from the National Park, adjacent to ancient woodland and is very popular with walkers, cyclists and horse riders. The Hampshire County Council Guide Equestrians in Hampshire gives clear direction on new developments impacting horse riders and this has not considered by the developer.

Strategic Gap. The proximity of Alton to Four Marks gets perilously closer through the elongation of the town with only the ancient woodland sites and SINCS providing any barrier at all which will put an unacceptable strain on them as they will effectively become residents back yards for recreation. Anyone currently travelling through to Medstead on the National Cycle Route and bridleway through the woods will report how quiet and tranquil the site is; a haven for wildlife.

Secondary School provision. Whilst the development at 1200 homes does not meet the threshold in its entirety for a new secondary school, added to the proposed extension of Will Hall Farm the 1400 home threshold would be met. With the application for the redevelopment of the brewery site requiring further expansion of Eggar's or Amery Hill, there is no evidence that they would be able to support the additional pupils generated from this Chawton Park proposal.

Finally, the site is too remote from the rest of the town to feel part of the community, it is a good mile walk back towards the town and residents will be reliant upon use of a car to get to the majority of destinations.

Alton Town Council Planning and Transport Committee response 9th October 2019

Large Development Sites Consultation

clerk@beechpc.com

Wed 09/10/2019 11:44

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (464 bytes)

BeechPC response to EHDC Large Sites Consultation.pdf;

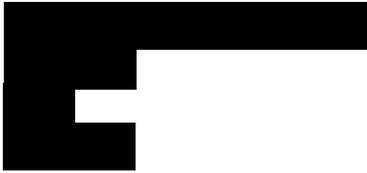
Please find attached Beech Parish Council's response to the Large Sites Consultation, please could you acknowledge receipt.

Kind Regards

Louisa

Louisa Thomson

Clerk Beech Parish Council



clerk@beechpc.com

Sent from eM Client | www.emclient.com

East Hampshire District Council
Large Development Sites Consultation

Response by Beech Parish Council – 23rd September 2019

Introduction

This document sets out the response of Beech Parish Council to EHDC's Large Development Sites Consultation launched on 3rd September 2019.

Beech Parish Council may be contacted at:

Mrs Louisa Thomson – Parish Clerk
[REDACTED]

Email: clerk@beechpc.com

The comments are confined to those candidate sites that:

- (i) Impinge upon the parish of Beech; and/or
- (ii) relate to facilities in the local area that are commonly used by the residents of Beech (e.g. in nearby Alton).

Accordingly, this response deals only with the following candidate sites:

- Chawton Park, which abuts Beech Parish; and
- The four sites located in Four Marks & South Medstead.

In particular, Beech Parish Council's view is that the Chawton Park site is completely unsuitable for development as urban housing.

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Chawton Park

Beech Parish Council considers Chawton Park to be unsuitable as a Large Development Site on the grounds set out below.

1: Do you have any comments on the proposed uses?

The land is good quality agricultural land. It is located west of Northfield Lane on rising ground, visible for long distances from the east and southeast (including from the South Downs National Park), in what is now a quiet rural valley head. The westward extension of Alton into this quiet, relatively isolated, pastoral gap between Chawton and Beech would transform unspoilt open countryside into an urban environment (with housing at a density of 37 per hectare), in a more extreme manner than for most, if not all, of the other candidate sites.

This development would put in train the progressive engulfing of Beech village by the Alton urban area, from the south as well as from the east. There would be almost continuous housing estate development along the southern boundary of Beech parish from the Lord Mayor Treloar development in the east to the boundaries of Old Park Farm in the west, a distance of about 2.6km. The northern boundary of the site (where it abuts Bushy Leaze Wood) is only about 400 metres from the nearest houses in Beech village, which is much closer than existing Alton housing at Whitedown Lane (c.700 metres from Beech village).

The site lies hard up against Chawton Park Wood to the south, and Bushy Leaze and Ackender Woods to the north. All three of these woodlands are Sites of Importance for Nature Conservation (SINCs) and contain ancient woodland. Although they are already open for public access, the impact of their regular and intensive use by the residents of an additional 1,200 densely packed houses directly alongside must be considered potentially damaging and undesirable in terms of conservation of ancient woodland.

Development of this site would close off nearly all of the existing wildlife corridor between Ackender & Bushy Leaze Woods, to the north, and Chawton Park Wood, to the south. The importance of this wildlife corridor is identified in the emerging Beech Neighbourhood Plan.

We note that this site was put forward to the 2018 Land Availability Assessment. Due to the site's various characteristics and constraints, Northbrook Park and a site in Whitehill & Bordon were deemed by EHDC as better options for inclusion as large sites in the draft Local Plan published in Spring 2019. We see no reasons why that judgement should be overturned.

2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

The bulk of the site is about 3.5km from Alton town centre (the junction of High Street and Market Street), not 1.5km as stated in EHDC's assessment documents. Similarly the centre of the site is 2km (not 800m) from the nearest doctors' surgery (Chawton Park Surgery), and 2.5km (not 400m – 800m) from the nearest primary school (The Butts). Alton Sports Centre, well to the east of the site, is itself over 1.5km from Alton town centre. So the Stage 2 Assessment of this site is flawed, and distance from Alton town centre is definitely not an 'insignificant' factor as the assessment claims.

This site is roughly double the distance from Alton town centre than is the most remote current new development in the town (Cadnam's Farm). Notwithstanding any limited services built in this 'new village', the vast majority of services will be accessed in Alton, and practicality all journeys to Alton

will be by car, given the distance. Like other villages very close to Alton (e.g. Holybourne, Beech), Chawton Park would be primarily a car-dependant settlement, contrary to the developer's claims and irrespective of the number of footpaths, cycleways and bus routes put in place. Assuming 2,500 cars based in a 1,200 house development, the adverse consequences for traffic congestion and parking in Alton are obvious and significant.

Expecting road traffic to access this size of development via residential Chawton Park Road and narrow Northfield Lane would lead to unacceptable congestion in the immediate road network, down to and including the A339 Whitedown Lane. If this site were to be developed it would be essential beforehand to construct the proposed Alton Western Bypass, giving easy access from this development south to the A31 and A32 at the Chawton roundabout, and north to the A339 and B3349 via the junction of Basingstoke Road and Whitedown Lane.

Consideration could also be given to the scheme, mooted about 10 years ago, to extend the main railway line (from London Waterloo) west to a new Alton Parkway railway station, sited near the Northfield Lane railway bridge, designed to serve the west of Alton and the villages in a c.10 mile radius to the west and south. This rail extension would make rail commuting easier for local people in a wide area, taking traffic off the A31 in particular, and reduce traffic travelling through Alton to the existing railway station, about 4.5km away from this site.

It would seem untenable to have only a single access road, the extension of Chawton Park Road, into a development of this size, in the event of the closure of that road in an emergency. An additional western access road (towards Medstead/Beech) would be undesirable because (i) it would need to pass through historic parkland at Old Park Farm, or cut through Bushy Leaze Wood SINC; and (ii) additional traffic would be created through Beech as drivers from the western end of the development use Kings Hill as a rat run to the A339 – and Beech's roads are already considered hazardous due to a combination of their narrow, windy nature, vehicle speeds and the absence of footways.

We note that the developer's proposal does not address the need to retain or replace existing bridleways (as opposed to footpaths and cycle routes) crossing the site.

3: Do you know of any other constraints to developing the site? Please provide detail and evidence.

We understand that the capacity of the public sewer and sewage treatment system in Alton, into which this development would drain, is inadequate to handle further new developments of this size.

4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.

None. It would be less integrated with Alton (in terms of proximity to the town centre and railway station, and the feasibility of walking to either) than the Neatham Down site.

5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

None.

6: The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No.

All four sites in Four Marks and South Medstead:

- **Four Marks South**
- **Land South of Winchester Road, Four Marks**
- **South Medstead**
- **West of Lyminster Bottom Road, South Medstead**

Beech Parish Council considers all of the four potential Large Development Sites in Four Marks and South Medstead to be undesirable on the following grounds.

1: Do you have any comments on the proposed uses?

No response.

2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

The incidence of car drivers 'rat running' through Beech, from the direction of Medstead and Four Marks to the A339 and B3349, has observably increased as new housing developments have been completed in Four Marks and South Medstead over the past 10 years or so. If one or even two further new developments of 800+ houses were to be sited in those areas, the incidence of rat running through Beech at inappropriately high speeds is likely to increase significantly. Beech's roads are already considered hazardous due to a combination of their narrow, windy nature, vehicle speeds and the absence of footways (as identified in the emerging Beech Neighbourhood Plan and its evidence base). At the very least, developer contributions would need to be earmarked to construct footways and appropriate traffic calming measures through Beech village.

3: Do you know of any other constraints to developing the site? Please provide detail and evidence.**4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.****5: What are the cross-boundary considerations and the potential implications? How can they be overcome?****6: The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?**

No response.

East Hampshire Large Development Sites consultation [CJ-WORKSITE.FID538113]

[Redacted]

Mon 14/10/2019 16:28

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (2 MB)

Bentley Action Group (Final) and Annex A.PDF;

Dear Sir or Madam,

East Hampshire Large Development Sites consultation

Please find attached herewith submissions to the above listed consultation on behalf of the Bentley Action Group.

The Bentley Action Group is listed in the consultation portal as [3367] and the groups is represented by Carter Jonas ([Redacted] [3366])

If you have any questions about the attached, or would like any more information do please contact me.

Yours faithfully,

[Redacted]

[Redacted]

Associate Partner

Carter Jonas

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Mayfield House, 256 Banbury Road, Summertown, Oxford, OX2 7DE



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**EAST HAMPSHIRE
DRAFT LOCAL PLAN 2017 - 2036**

LARGE DEVELOPMENT SITES CONSULTATION

**RESPONSE ON BEHALF
OF
THE BENTLEY ACTION GROUP**

Carter Jonas

October 2019

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Annex A: Previous Bentley Action Group consultation comments.

1.0 INTRODUCTION

1.1 Carter Jonas is instructed by the Bentley Action Group to respond to East Hampshire District Council's ("the Council") Large Development Sites Consultation.

1.2 The consultation document and supporting evidence documents have been reviewed. The Bentley Action Group is pleased to note that the Council is now presenting a comparative exercise of ten (refined from a list of twelve) large development sites, from which only two will need to be chosen. Each large development site has been stated to have the potential to accommodate/provide the following:

- At least 600 new homes (a range of sizes/types, including affordable homes)
- At least 1ha of employment land
- Accommodation for travellers and travelling show people
- Infrastructure mitigation and improvements, including road and highway improvements.

1.3 As per the Spatial Strategy for East Hampshire in the draft Local Plan (Reg.18), it remains the aim that new homes will be directed to the most sustainable and accessible locations which have the most capacity to accommodate them whilst respecting local distinctiveness, protecting the physical, natural and historic environment, and recognising that places change and should grow sustainably.

1.4 Furthermore, the Bentley Action Group notes that on Tuesday 27 July 2019 the Council officially declared a climate emergency. The statement¹ that accompanied the declaration explains that Councillors have:

"...pledged to work across political parties to achieve a list of 'ambitious and achievable' targets and build on its long-standing environmental track record.

"Among the objectives are the appointment of a Climate Change Champion, retrofitting homes with energy-saving improvements and planting a tree for every resident in the district.

"At its Full Council meeting on Thursday 18 July, EHDC pledged to renew its environment and energy strategy with actions that will reduce its carbon emissions and promote sustainable business practices.

"The strategy will ensure that all council services focus on environmental issues as part of everyday decision-making. It will promote sustainable building standards through the council's planning and building standards work..."

1.5 The Bentley Action Group considers therefore, that this declaration alongside its commitments to improving existing built development, and seeking standards on anything proposed, requires that the Council's own decision making should put climate

¹ <https://www.easthants.gov.uk/news/ehdc-declares-climate-emergency>

concerns at the heart of everything the Council does, and this emphasises even more clearly the importance of “sustainability” in the consideration of any new major site.

- 1.6 The proposed allocation of Northbrook Park for major development is not sustainable. There are significant constraints to development at Northbrook Park that the Bentley Action Group presented to the previous consultation in March 2019. These constraints and issues are not presented here again, but the previous comments are included at Annex A for reference. These submissions should be read in conjunction with those previously made by Bentley Action Group.
- 1.7 Potential development at Northbrook Park is certainly not favourable when considered alongside the reasonable alternatives that have been tested through the Council’s evidence. It is also telling, and material to consideration of the site by the Council, that the site was rejected comprehensively by Waverley Borough Council as part of its site assessment work for the recently adopted Waverley Borough Council Local Plan Part 1: Strategic Policies and Sites.
- 1.8 Bentley Action Group understands the need for two large development sites to be included in the Local Plan and that provisions for new housing and development need to increase in East Hampshire. However, Bentley Action Group is particularly concerned about the suitability of some of the large development sites, in particular Northbrook Park. Therefore this submission to the Large Development Sites Consultation suggests that Northbrook Park is not allocated as one of the two large development sites and that one of the reasonable alternative sites is used in its place.
- 1.9 These submissions consider the relative benefits and challenges of each of the ten large development sites presented by the Council in turn and conclude that the best course of action for the Council is to withdraw the proposed allocation of Northbrook Park, and instead look to alternatives for sustainable development.

2.0 THE COUNCIL’S OVERALL ASSESSMENT

- 2.1 The Council presents, in the *Site assessment Background Paper*, ‘Table 8’ which shows the results of a ‘Red/Amber/Green’ analysis for each of the ten sites that are considered suitable for the consultation. This table lists the sites in alphabetical order with the associated colour coded assessment alongside. This analysis is by way of comparison and there is no ‘weighting’ or ranking of any of the constraints.
- 2.2 Bentley Action Group has reviewed this table. A simple reorganisation of the table that ranks the sites by the overall number of ‘red’ and ‘amber’ assessments from lowest to highest demonstrates that the development site option at the West of Lymington Road, South Medstead has the fewest ‘reds’ and ‘ambers’ (3) and Northbrook Park has by far the most (12). It is also possible to observe that the opposite can be said of the number of ‘green’ assessments and that Northbrook Park has the fewest. This is presented in the Bentley Action Group’s figure 1, below:

Figure 1: reordered ‘Table 8’ of the Council’s Site assessment Background Paper (pg. 33)

	SAC / SPA	SSSI	SINC	Ancient Woodland	Listed Building	Conservation Area	Scheduled Monument	Registered Park / Garden	National Park	Town / Local Centre	Primary School	Doctor	FZ 2 or 3	Surface Water Flood Risk	Ground Water Flood Risk
WEST OF LYMINGTON BOTTOM ROAD, SOUTH MEDSTEAD	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Green
NEATHAM DOWN	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Red
SOUTH MEDSTEAD	Green	Green	Red	Yellow	Green	Green	Green	Green	Yellow	Green	Red	Green	Green	Yellow	Green
FOUR MARKS SOUTH	Yellow	Green	Red	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Yellow	Green
LAND SOUTH OF WINCHESTER ROAD, FOUR MARKS	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Red	Green
CHAWTON PARK	Yellow	Green	Red	Red	Red	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Yellow	Green
WHITEHILL & BORDON	Red	Red	Red	Green	Yellow	Green	Red	Green	Red	Green	Green	Green	Green	Yellow	Yellow
EXTENSION OF LAND EAST OF HORNDEAN (HAZELTON FARM)	Green	Green	Red	Red	Green	Green	Green	Green	Red	Red	Red	Yellow	Green	Yellow	Red
LAND SOUTH EAST OF LIPHOOK	Yellow	Yellow	Red	Red	Red	Red	Green	Red	Red	Green	Red	Green	Green	Yellow	Red
NORTHBROOK PARK	Yellow	Yellow	Red	Red	Red	Green	Green	Green	Red	Red	Red	Red	Yellow	Red	Red

- 2.3 Bentley Action Group finds it difficult to accept that the Council views Northbrook Park as a suitable and sustainable option for development given the above high level analysis. This same broad assessment was made previously in the Council’s Sustainability Appraisal (SA), which demonstrated that Northbrook Park was not a straightforward, or favourable option for sustainable development. For reference, see the comments previously submitted by Bentley Action Group regarding the SA at Annex A.
- 2.4 It is accepted that the Council is not required to choose the most sustainable option for development, nor will the decision be made purely on the analysis presented in ‘Table 8.’ However, if the Council is not taking the most sustainable approach then a greater amount of mitigation will be required for the identified development, and the benefits of the development will need to significantly outweigh the harm.
- 2.5 The following sections of these submissions consider each of the large site options, and their relative merits. For each option the benefits are considered and whether they might be capable of outweighing the harm identified.

Duty to Cooperate

- 2.6 The Council has also presented a table on page 14 of the consultation document that includes a list of neighbouring authorities which would be impacted by each of the large development site options. This list includes other local authorities and the South Downs National Park Authority. The Bentley Action Group considers it vital that each and all of the sites is discussed with the neighbouring authorities, via the Duty to Cooperate, so that direct and cumulative impacts can be properly considered and assessed.

2.7 The Bentley Action Group notes the Council's comments on page eight of the consultation document that statements of common ground, regarding the Duty to Cooperate will be published for later consultations, and that joint work is continuing amongst the local authorities. It is disappointing that no evidence of the Duty to Cooperate has been published by the Council alongside this consultation on issues that are of acute cross boundary importance. Of particular concern to the Bentley Action Group is that there is no evidence of Waverley District Council:

- accepting the proposed benefits of the Northbrook Park proposals;
- being aware (or accepting) that the promoters most favoured waste water treatment option is to the east of Farnham (c4 miles away); and
- being complicit in the site now including land within their authority area to deliver the necessary suitable alternative natural greenspace.

3.0 WEST OF LYMINGTON BOTTOM ROAD, SOUTH MEDSTEAD

3.1 The table hereunder considers the benefits and challenges of the proposed 'West of Lymington Bottom Road, South Medstead' option:

Benefits	Issues	Infrastructure	Comments
<ul style="list-style-type: none"> • 650 homes • Gypsy and traveller x5 • Travelling show people x5 • Employment 2ha • At least 5.5ha of formal provision for green space • Primary school 1.2ha • Expansion of local centre A1-A5, B1 and C3) • No landscape designations on site • No existing rights of way on site • No TPO 	<ul style="list-style-type: none"> • Highway impact • Hedges and trees 	<ul style="list-style-type: none"> • A new primary school • Public open space including sports pitches and play areas • Multi-functional green infrastructure • Connectivity with existing services and facilities • Sustainable Drainage Systems 	<ul style="list-style-type: none"> • The A31 is a key cross boundary transport route

3.2 'West of Lymington Bottom Road' has been assessed, by the Council, as the least constrained site of the ten options. This site option is shown at the top of the table at Figure 1 above. There are relatively limited landscape, heritage and biodiversity impacts expected. There is also potential at South Medstead to link with the services and facilities at Four Marks.

3.3 There are recent development completions around the proposed large development site option at 'West of Lymington Bottom Road.' The recent delivery of new homes can provide a catalyst for the delivery of further housing and infrastructure. The Bentley Action Group, however, recognises that there are local constraints particularly to the highway network. This impact will be felt at the A31, but the junctions in Four Marks appear capable of managing some increase in transport movements. Access underneath the railway line however, through to Four Marks, will be limited by the width of the bridge arch but this could encourage walking and cycling to the facilities in that location.

3.4 The promoters of 'West of Lymington Bottom Road' suggest that the site can deliver homes, employment and a new primary school. The latter will remove one of the 'red' assessments of the Councils high level assessments in 'Table 8.'

Conclusion

3.5 The relatively small number of constraints that are presented at 'West of Lymington Bottom Road' appear capable of being mitigated. The greatest challenge will be

managing transport movements at the ‘pinch point’ of the railway bridge, but this could be developed into a pedestrian and cycle priority junction. Bentley Action Group suggests that the benefits presented by the delivery of new homes that can support and make use of local services and facilities outweighs the limited constraints presented by the Council in this location.

4.0 NEATHAM DOWN

4.1 The table hereunder considers the benefits and challenges of the Neatham Down proposed option:

Benefits	Constraints	Infrastructure	Comments
<ul style="list-style-type: none"> • Employment area 1ha • Pub and local shop • Village green • Village hall • Primary school • 600 new homes 18ha • Single land ownership 	<ul style="list-style-type: none"> • Landscape setting and capacity • Highway impact 	<ul style="list-style-type: none"> • Make use of Alton's existing infrastructure including access off the A31 roundabout. • Alton has railway station • New bus service to be provided • Improvements to the A31/B3004 roundabout • Improvements to the existing crossing over the A31 for ped/cycle access to Alton • A new (<i>electric</i>) bus service from the centre of Neatham Down to Alton • Upgrade of walking and cycling routes to Alton town centre • Flexible multi-use open space, including gardens, parks, natural and semi-natural & amenity green space, allotments • Sustainable Drainage System • Upgrade broadband • Electric car charging points 	<p>Potential for water harvesting and a wildlife corridor.</p>

4.2 The Council's assessment of the 'Neatham Down' option for large scale development reveals the fewest 'red' conclusions, however it has more 'amber' issues and so is shown as the second site comparatively in Figure 1 above. The physical, ecological and heritage challenges presented by the 'Neatham Down' option all appear capable of being mitigated, save for areas of flood risk that can be ruled out of development.

4.3 The promoters of the 'Neatham Down' option have presented a comprehensive proposal with new homes supported by a range of supporting services and infrastructure. The proposals include ambitions to deliver design and sustainability credentials (electrical vehicle support etc.) that are likely to become necessary in the near future given our very real need to deliver an energy efficient and carbon neutral future, however, the Bentley Action Group does not consider this to be reason to promote one particular site over another.

4.4 The Bentley Action Group considers that the greatest hurdle to this site is similar to Northbrook Park – but certainly not to the same extent – that it is detached from existing communities, services and facilities. This site option is likely to be dominated by private transport movements and is separated from the services and facilities of Alton

by the A31. However, there is a mitigation package presented that includes cycle and pedestrian links into Alton but these would need to be of high quality, and safe and secure for all users, if they are to persuade people to make regular use of them.

- 4.5 Whilst the A31 is a physical barrier between the site and the services and facilities of Alton, it can be viewed as a potential benefit. The strategic positioning of the site on a 'north / south' and 'east / west' road axis means that journeys from the site can be dissipated in four directions rather than just two thus reducing the likely risk of one or two 'pinch points' of traffic flow. Noting the risk of the site being dominated by private transport use, the strategic access to this site option does also presents a good opportunity for quality and viable bus access and route options.

Conclusion

- 4.6 This 'Neatham Down' option is presented with limited constraints and a range of benefits. However, its delivery will be dependent upon the delivery of a credible, useable and sustainable transport link between the site and Alton.

5.0 SOUTH MEDSTEAD

5.1 The table hereunder considers the benefits and challenges of the proposed South Medstead option:

Benefits	Constraints	Infrastructure	Comments
<ul style="list-style-type: none"> • 600 dwellings • Employment 2ha • Potential for 2 FE Primary school • Potential for plots for G&T • Avoids encroaching into countryside • outside SDNP and Medstead local gap 	<ul style="list-style-type: none"> • Highway impact • Hedges, trees and woodland 	<ul style="list-style-type: none"> • largely contained with existing roads • Opportunities to connect existing paths and cycle paths • New two form entry primary school and/or investment in the existing schools • Public open space • New children’s play spaces • Improvements to existing local services and facilities 	<ul style="list-style-type: none"> • Landscape setting, views into and out of the South Downs National Park • The A31 is a key cross boundary transport route

5.2 The ‘South Medstead’ large development site is closely linked (and appears to share some land) with the ‘West of Lymington Bottom Road’ option. The Bentley Action Group questions why there has been no investigation of a comprehensive option that considers both of the two options together.

5.3 Turning to the presented benefits and constraints, these too are very similar to the ‘West of Lymington Bottom Road’ option. In Figure 1 above, this site is listed third in the table. There are limited landscape, heritage and ecology impacts except for this site option is more visible from the South Downs and is closer to the ancient woodland north east of South Medstead. This large development site option will be able to make use of the existing service and facilities at South Medstead and Four Marks, introduce some new facilities, such as a school that can be accessed by new and existing residents, and can help to create a local network of pedestrian and cycle paths to connect the various services.

5.4 The potential constraint of the railway bridge on ‘Lymington Bottom Road’ and the impacts on the A31 will need to be considered but there appears to be opportunity to promote cycle and pedestrian movements and other mitigation can be included.

Conclusion

5.5 The Bentley Action Group suggests that this ‘South Medstead’ site option is well related to the existing local built form, has access to local service and facilities and has capacity to deliver school improvements where necessary. The landscape impacts are reported to be limited but would need to be managed, as would transport movements especially at the railway bridge on ‘Lymington Bottom Road.’

6.0 FOUR MARKS SOUTH

6.1 The table hereunder considers the benefits and challenges of the proposed Four Marks South option:

Benefits	Constraints	Infrastructure	Comments
<ul style="list-style-type: none"> • 800 homes over 12 years • surrounded by existing residential development • 2FE Primary School • self and custom build • 1.25ha employment and community uses • care home / extra care facilities • Over 5ha green space 	<ul style="list-style-type: none"> • Multiple land owners • Landscape setting • Highway impact • Trees and hedgerows • Nature and ecological designations • Heritage asset 	<ul style="list-style-type: none"> • Vehicular access via Blackberry Lane and Alton Lane • Public right of way connects two areas of village • Relocation of primary school to more central accessible location • Improvements to existing sewerage system. • Fund highway improvements to the A31 	<p>Extra care facilities – link to need identified</p>

6.2 This ‘Four Marks South’ large development site appears to be a relatively discrete and self-contained option. The site is surrounded by built development, and the constraints that are presented – listed buildings and landscape impact – will be tempered by the surrounding built character. This large development site option is listed fourth in the table at Figure 1 above.

6.3 ‘Four Marks South’ is well located to take advantage of the existing services and facilities of Four Marks, and sustainable links for walking and cycling could easily be created to link the development and existing communities and destinations. The site is however, distinct from the main route through Four Marks and therefore it is considered that it will not adversely affect character.

6.4 The greatest constraints appear to be the multiple ownership of the site, which may slow delivery of development, and the potential impact upon the A31. The infrastructure package presented by the site promoters would appear to engage with the transport challenges.

Conclusion

6.5 The Bentley Action Group considers that the constraints of this site could be mitigated, and the benefits – including its well-connected and sustainable location – could be capable of outweighing the harm to the landscape.

7.0 LAND SOUTH OF WINCHESTER ROAD, FOUR MARKS

7.1 The table hereunder considers the benefits and challenges of the proposed Land South of Winchester Road, Four Marks option:

Benefits	Constraints	Infrastructure	Comments
<ul style="list-style-type: none"> • 600 dwellings • Employment area • Local centre • Primary school • Travelling show people site and travellers site • Sports hub 	<ul style="list-style-type: none"> • Long and short distance views • Topography • Highway impact • Trees, woodland and ancient woodland • Nature and ecological designations • Noise • Flooding 	<ul style="list-style-type: none"> • Access from the A31 • enhancement of public rights of way • Improve public transport • A primary school and pre-school • Public open space / recreation ground • Allotments • Local centre • Green infrastructure 	<p>CIL could be used for investment in sustainable modes of travel, pedestrian and cycle facilities and education.</p>

7.2 The 'Land South of Winchester Road' represents another option that is close to existing services and facilities and could represent a sustainable extension to Four Marks. This option has a number of the same benefits as the three which precede it above. This site is fifth in the table at Figure 1 above, and this is primarily because it is closer to an area of ancient woodland and there is a small amount of surface water flood risk on the site, which appears to be associated with the A31 drainage ditches.

7.3 This site is at a more sensitive edge of Four Marks than 'Four Marks South' and indeed the two sites in South Medstead. The site is more visible from the South Downs National Park, and there is less existing development in the area to help mitigate the landscape impacts. The promotor of 'Land South of Winchester Road' suggests that the constraints of the site can be mitigated through design and appropriate landscaping. The Bentley Action Group considers that this type of mitigation might be achievable.

7.4 The greatest challenge for 'Land South of Winchester Road' would appear to be, comparatively to other options at Four Marks especially, its distance from the town centre and the relative access to service and facilities. The site is better connected to Four Marks than Northbrook Park is to Bentley or Farnham (for example) but it is still at a distance, and any person traveling to the centre of Four Marks would likely use the A31. The A31 is a main through route in the area, and adding additional traffic to it will require reasonably significant transport upgrades and mitigation. Moreover, the site's situation alongside the A31 is likely to encourage the use of private transport, so any development would need to include high quality public transport and pedestrian and cycle links at an early stage to encourage habitual use of sustainable transport modes.

Conclusion

7.5 The Bentley Action Group considers that the 'Land South of Winchester Road' is capable of representing a sustainable development option. The key challenges to

overcome will be sustainable travel and to a lesser extent the landscape impact of the option. This site option has greater potential for sustainable development than options such as Northbrook Park, given its proximity to the services and facilities at Four Marks, but is perhaps not a location that is as accessible as others available around Four Marks.

8.0 CHAWTON PARK

8.1 The table hereunder considers the benefits and challenges of the Chawton Park proposed option:

Benefits	Issues	Infrastructure	Comments
<ul style="list-style-type: none"> • 1200 dwellings • Over half of site will be retained as public open space • Excellent location close to Alton • Site is unaffected by flood risk and would not require SANG. • Local centre • Proposed 2FE primary school • Walkable distance to new employment allocation site SA24 • Potential for additional areas of planted woodland 	<ul style="list-style-type: none"> • Visual impact on National Park • Areas of ancient woodland to north and south and tree belts are SINCS • Grade II listed farmhouse and associated buildings on site 	<ul style="list-style-type: none"> • Potential for improvements to highway infrastructure – upgrade Chawton Park road connection to Northfield Road. • accessible to proposed employment allocation at Northfield Lane • Improved access to wider countryside, footpaths and cycle ways. • Green Infrastructure strategy • Possible increased frequency of award winning 64 bus service • Alton railway line to London Waterloo. 	<p>Surrounded by Bushy Leaze Wood and Chawton Park Wood – connect the two</p> <p>Alton would benefit from £15 mil of CIL contribution to be generated by proposal.</p>

8.2 The 'Chawton Park' large development site option is sixth in the table presented at Figure 1 above. The greatest constraint to development of this site option appears to be the impact on heritage assets and the proximity to ancient woodland.

8.3 The Bentley Action Group suggests that any development proposals in this location would be made in the full knowledge of the local heritage impacts. The promoters of this site option suggest that the local heritage at the site has the potential to form a significant motivation for any design and layout of development that could turn the constraint into an opportunity. There is potential, then, that two of the strongest constraints can be mitigated but the harm that could be caused would still need to be balanced against the benefits of development.

8.4 Turning to the potential benefits of development at the 'Chawton Park' site option, these are primarily provided by the overall scale of development that can include a significant number of new homes and a range of supporting services and facilities. The scale of this large development site option would provide a critical mass for services and facilities (and development economics) to prove viable. The same cannot be said of the site option at Northbrook Park.

8.5 This site option is at the edge of Alton, the most well served settlement of East Hampshire. However, the site (especially at its western extreme) is at some distance from the centre of Alton and facilities such as the railway station. A key challenge – as with 'Land South of Winchester Road' – for this site option is creating genuinely appealing sustainable transport choices. Sustainable transport would need to be

delivered early to create habitual use. This site does benefit, however, from its proximity to proposed employment, and has the capacity to include service that could 'internalise' some necessary travel, for example, of children (and staff) to school.

Conclusion

- 8.6 'Chawton Park' which includes a listed farmhouse and is close to a registered park and garden is a large development site option that, if realised, would need to be very sensitively designed and laid out. The adjacent ancient woodland would need to be protected from development impact but appropriate phasing could achieve this protection. The Bentley Action Group considers that the scale of this development has the potential to deliver sustainable development, but sustainable transport links to Alton would be a pre-requisite and the transport impacts on the A31 would need to be carefully managed.

9.0 WHITEHILL & BORDON

9.1 The table hereunder considers the benefits and challenges of the Whitehill & Bordon (referred to within this section as W&B) proposed option:

Benefits	Constraints	Infrastructure	Comments
<ul style="list-style-type: none"> • 2400 dwellings • Largest regeneration projects in the UK • Hybrid Planning Application • Hogmoor Enclosure Suitable Accessible Natural Greenspace (SANGS) • Sustainable expansion to 23,000 population • Already 1000 jobs created out of 3000 for HPA. • BOSC village already developed • already connected to footpath and local cycle routes • Redevelopment of Sacred Heart Church Site inc. new church building and nursery. • No known services/utilities constraints • W&B to deliver 1000 additional jobs, 600 in town centre. • W&B designated as HNT in 2016. 	<ul style="list-style-type: none"> • Close to SPA/SAC however no land promoted within 400m of either • Scheduled Monument 	<p>HPA consent included infrastructure requirements to assist in the wider regen of the Strategic Allocation Area in the adopted Joint Core Strategy:</p> <ul style="list-style-type: none"> • New SANGS (provided and facilities buildings near completion) • Relief road to west of W&B (completed) • Secondary School and Sport (Near completion but can expand to 8FE if needed) • Primary School (3FE approved but wait for pop to grow) • Town Centre: (approved and RMA consent for Phase 1 granted early 2019) • New Sports at BOSC (completed) • Oxney Drain/Moss Corridor (completed) • Employment (Approved and RMA set for submission in 2020) • Skate park (completed) • Health Hub (submitted but awaiting decision) • New warehouse/offices 150 jobs (submitted/awaiting decision) 	<p>HPA S.106 = 54m to EHDC/HCC could be used for bus stops and increased provisions.</p> <p>Whitehill and Bordon Regeneration Company (WBRC) is Development Manager</p> <p>Defence Infrastructure Organisation (DIO) is the major land owner of the proposed expansion areas.</p> <p>Open public meetings held by key members of WBRC team</p> <p>Created with EHDC a local charity: W&B community trust to support needs of local people.</p>

9.2 The area near the W&B option is already the site of a large regeneration project, under a hybrid planning application (HPA). The majority of the W&B option has been previously developed including the redevelopment of the Sacred Heart Church Site, for which the NPPF provides strong support at paragraphs 84 and 117. This option would avoid the use of the surrounding greenspaces.

- 9.3 The addition of further development alongside the current large scale project, through the allocation of the W&B option, would be more beneficial for East Hampshire, with the expected growth in employment, infrastructure and services, rather than exceeding the capacities of these at other locations without these opportunities. There are three phases of development proposed for this option, which are adjacent to the existing large scale project. Therefore limiting the additional pressure on nearby infrastructure.
- 9.4 The proposed Suitable Alternative Natural Greenspaces (SANGS) could be created in accordance with the level of housing and associated population. There is also, a clear opportunity during the development at W&B to include 'C2' Care Home accommodation to help meet the *“expected to be a growth in the population of older persons, and therefore the need for an increase in specialist housing”* as identified in the Final Interim Housing and Economic Development Needs Assessment (HEDNA) as published in December 2018.
- 9.5 The infrastructure provision, as outlined in the table above, that is associated with the adjacent regeneration project at Prince Phillip Park (HPA) currently being developed incorporates a range of social and physical infrastructure that would also benefit W&B LDS. It included a number of *‘key supporting (non-residential) infrastructure elements to assist in the wider regeneration of the Strategic Allocation Area designated in the adopted Joint Core Strategy’* as stated by the site promoter in the background documents. The Section 106 agreement also includes a significant financial contribution toward improvements towards public transport (amongst other transport related measures) including the potential increase in the frequency of local services. All of which could be easily built upon if development were allocated in this location.
- 9.6 The site promoters consider their proposal to be deliverable within the local plan period to 2036. The Bentley Action Group believes it is achievable, primarily due to the large scale of infrastructure already in place with the potential to expand. Within the Joint Core Strategy it is stated that the town of Whitehill and Bordon *“can respond to the challenge of climate change, the need for more homes, and the need for more sustainable living in an innovative and ground-breaking way”* and therefore the W&B option should be one of the preferred choices for larger scale development.

Conclusion

- 9.7 The W&B option lies at the bottom of the middle third of the site options as shown in 'Figure 1' above. The broad analysis of constraints would suggest that this development option is not clearly suitable. However, the obvious benefits in this case and the opportunities that are presented by existing planned and emerging development – especially the delivery of infrastructure – make this a large site option with strong potential. The Bentley Action Group, therefore respectfully suggest that this site should be one of the two preferred choices for large scale development in East Hampshire.

10.0 EXTENSION OF LAND EAST OF HORNDEAN (HAZELTON FARM)

10.1 The table hereunder considers the benefits and challenges of the Land east of Horndean (Hazel Farm) proposed option:

Benefits	Constraints	Infrastructure	Comments
<p>Site is located to south of allocated site (LEOH) 61ha Extension would provide:</p> <ul style="list-style-type: none"> - Around 1,000 dwellings - 1.6ha employment - Local centre 0.89ha - Gypsy/traveller pitches x6 - Travelling show people plots x12 <ul style="list-style-type: none"> • Next to Junction 2 of the A3. Key transport route • Site is unaffected by flood risk • Single ownership of Borrow Investments Ltd and would occur after the LEOH until period 2036. 	<ul style="list-style-type: none"> • Site includes Blendworth Common SINC • Topography • Noise • Landscape Setting and capacity • Highways Impact • Landscape • Potential for protected Species • Utilities – Overhead electricity line, gas pipeline, underground cable. 	<ul style="list-style-type: none"> • Access onto B2149 • Safeguarding of links to allocated Havant Thicket Winter Storage Reservoir • Scope to provide bus route within the site and design of the route can ensure that all residents and workers are within short walk of bus stop. 	<p>LA and partners are working to support economic and housing growth.</p> <p>There is potential to create greater provision for G&T if needed.</p> <p>Relationship to the site of Havant Thicket Reservoir</p>

10.2 This Large Scale Development Site is situated to the south of an allocated site, LEOH. The LEOH comprises 700 dwellings, 2Ha employment, shop, community facilities, a primary school and a care village. By providing an extension to this to create a large development site, the infrastructure benefits from the LEOH could be used in conjunction with the large site option.

10.3 The site is located next to junction 2 of the A3, which is considered a key transport route, this would provide access for employment both into and out of the site. The site also has access onto the B2149. However, traffic congestion would need to be considered and relevant traffic controls put into place. It is likely that development in this location could result in excessive reliance on private modes of transport. It will be necessary to provide a bus route with this site option.

10.4 The site option is in an area where the local authority and other partners are working together to support economic housing and growth. This could provide relevant support for residential and commercial development at the Large Development Site.

Conclusion

- 10.5 This site option has significant constraints in terms of landscape impact and access to services and facilities. This is the third least suitable option as identified in 'Figure 1.' Bentley Action Group considers that it would be difficult to mitigate the transport challenges of this site option. This site option, like Northbrook, is likely to be dominated by private car use and as such is unlikely to represent a sustainable location. However, the association of this site with the neighbouring allocation could help to deliver some necessary infrastructure in an area identified for economic and housing growth.

11.0 LAND SOUTH EAST OF LIPHOOK

11.1 The table hereunder considers the benefits and challenges of the Land South East of Liphook proposed option:

Benefits	Constraints	Infrastructure	Comments
<ul style="list-style-type: none"> • Railway station already there within walking distance Portsmouth direct line. • Provide gateway to national park. • New SANG would reduce visitor pressure on Wealden Heaths Phase II Special Protection Area (SPA) • Connected to A3 transport corridor for south coast and M25. • Whitehill & Bordon is 4 miles to north. • Potential for the following: • 600 dwellings (emerging policy S6 = 40% affordable so 240 affordable) • 2ha for employment (b use) • 5ha Open space/sport/education • 15.4ha SANG 	<ul style="list-style-type: none"> • Landscape constraints of South Downs national park means this site is most suitable one in Liphook. • Two areas within site that have TPO's: would be incorporated into design for dev. • Listed building on outskirts of site: have allocated green space opposite to help maintain setting of building. 	<ul style="list-style-type: none"> • Three main access points will be provided for vehicles. • Potential pedestrian and cycle improvement to Midhurst Road to create link between station, houses and South Downs. • Facilities and assets to support future social dev would be included • New highway infrastructure for a bus route through the site. • Potential for new relief road but would mean relocation of football pitches. • Primary school needed for 600 dwellings (180 spaces) subject to capacity and delivery timings. 	<p>Bramshott & Liphook Neighbourhood Development Plan Steering Group</p> <p>Liphook currently Large Local Service Centre/2nd Tier Settlement.</p> <p>S106 or Community Infrastructure Levy to contribute towards congestion issues however subject to strategic transport testing as part of local plan process.</p>

11.2 The site is split into two sections at the north of Chitley Lane and at the south. A small portion of the site is outside of East Hampshire district boundary and is therefore into the South Downs area. The site being in two sections allows the new residential development to be situated next to the existing settlement of Liphook.

11.3 The Land South East of Liphook already has a variety of existing infrastructure benefits nearby. These include the railway station with a link to Portsmouth and the A3 transport corridor for the South Coast and M25. These would provide residents ease of access to nearby settlements for residential and employment purposes, reducing the need on the development itself. The site is also located 4 miles to the South of Whitehill & Bordon, which provides additional benefits as explained in section 2 of this response.

- 11.4 Allocating a Large Development Site at Liphook would require significant landscape mitigation and the protection of views into and out of the South Downs National Park. There is the potential benefit of increasing visitor numbers in the National Park and for local shops, but the former would require careful management to ensure no deterioration of what is special about the National Park.
- 11.5 This option would require a new Suitable Alternative of Natural Greenspace (SANG) of 15.4Ha. This is necessary to reduce the pressure on Wealden Heaths Phase II Special Protection Area (SPA) and provide local people with an alternative recreational space at the edge of the National Park. The current use of the site is arable agriculture and a local chicken farm.
- 11.6 The constraints of the South Downs National Park mean that this site is the only one that the Council considers is suitable and available at Liphook. However, the site includes two tree preservation orders; it is close to the Liphook Conservation Area; and, on the outskirts there is a listed building, all constraints to development on the site.
- 11.7 Although some provision is made for employment within the large development site at Liphook, there is a heavy reliance on movement of people to work in neighbouring settlements, such as Whitehill & Bordon. This would impact the highways and possibly cause congestion. A new relief road has been raised by the Neighbourhood Plan Steering Group to ease this, however it would cause relocation of the football pitches and has not yet been included within the development proposal. Section 106 monies or Community Infrastructure Levy from the large development site allocated here could contribute towards congestion issues mentioned above, however this would be subject to strategic transport testing as part of the local plan process and therefore its suitability for additional transport measures is unknown.

Conclusion

- 11.8 This site option has significant constraints, in terms of landscape and heritage. In 'Figure 1' this site is ranked the second least suitable, and the Bentley Action Group considers that the benefits are unlikely to be able to outweigh the harm to the National Park, in particular. This site offers a relatively weak large development site opportunity.

12.0 NORTHBROOK PARK

- 12.1 The Bentley Action Group identified in its consultation responses in March 2019 that there are significant challenges to the potential to deliver sustainable development at Northbrook Park. The Group also notes that the Council reported in its consultation summary that there were many other objections that reflected the comments made by the Bentley Action Group. The Group is aware that the Parish Councils of Froyle, Binsted, and Farnham and Waverley District Council have all raised significant concerns about the proposals at Northbrook Park.
- 12.2 The constraints at Northbrook Park which raise particular concern include:
- the need to improve transport infrastructure and access;
 - the presence of flood risk and flood zones (FZ) 2 and 3 on part of the site;
 - the need for suitable alternative natural greenspace (SANG);
 - impacts upon Sites of Importance for Nature Conservation (SINCs);
 - ancient woodland
 - listed buildings; and,
 - the local sewerage / waste water capacity
- 12.3 Detail of each of these matters was submitted at the previous round of consultation and is attached at Annex A to these comments for reference. It is not proposed to cover the same ground in these comments. However, concerning the impact on the historic environment, the Bentley Action Group wishes to raise the issue of an additional constraint which is that historic photography and more recent geophysics investigation demonstrate that there are earthworks to the south of the A31 at Northbrook that can be interpreted as the site of a Late Bronze Age ringwork of potential national importance
- 12.4 The Bentley Action Group also notes that the strategy for the removal of waste water for the site has changed. The promoter is now suggesting that instead of using the wastewater treatment works at Bentley, the works at Farnham (around four miles away to the east) will be connected to. The Bentley Action Group has not seen any convincing evidence that there is sufficient capacity at the wastewater treatment works in Farnham, or that it can be extended, or even if it can be extended, whether the increase in effluent can be processed without an unacceptable increase in nitrates and biochemical oxygen demand.
- 12.5 Furthermore, there remain significant concerns about the amount of available land and whether this is sufficient to deliver a truly sustainable development and indeed the overall viability of the project. It is noted that the proposal appears to include land that is in Waverley District. This is not necessarily disputed, or suggested to be an insurmountable constraint, but this is another complication with the Northbrook Park option that is not presented with other options. The Bentley Action Group has also noted above in section 2 that there is no evidence that through the Duty to Cooperate Waverley District Council is in agreement with the allocation of the site or critically the inclusion of land in its district.
- 12.6 Northbrook Park is listed tenth and last in the table at Figure 1. It is noted, as it was in the previous consultation, that the ‘traffic light’ assessment identifies a significant number of very challenging constraints at Northbrook Park. This, like the Sustainability Appraisal that was published alongside the previous Local Plan consultation presents

a very clear picture of the relative level of constraint at each site. Bentley Action Group acknowledges that there is no requirement to choose ‘the most’ sustainable option, it is still important to note that Northbrook Park has the highest number of ‘reds’ and ‘ambers’ recorded against it compared to the alternatives.

- 12.7 The other site options have been discussed in these submissions, and many of them have fewer constraints in the first instance. Those sites that have constraints appear to include mitigation strategies that can overcome or successfully minimise adverse impacts. Moreover, the other site options have better access to existing services and facilities that can balance the needs of new and existing communities. None of this can be said of Northbrook Park.

13.0 CONCLUSION

- 13.1 Bentley Action Group understands the Council’s contention that, given its chosen strategy, two major development sites are needed to deliver its housing needs in the Local Plan. However it remains totally unconvinced by the sustainability, deliverability and suitability of development at Northbrook Park. This latest exercise that the Council has undertaken to consider the various large development site alternatives goes to highlight that several of other options represent better and more appropriate locations.
- 13.2 Figure 1 that Bentley Action Group presents in Section 2 above, clearly demonstrates that sites near South Medstead and Four Marks are least constrained. These site options are also close to existing service and facilities and sustainable transport options. There are site options, such as Whitehill and Bordon, which have constraints but the combination of location and nearby strategic development suggest that sustainable development could be delivered that would outweigh the identified harm. The Bentley Action Group accepts that any new development site of the scale discussed in this consultation will require significant infrastructure investment and delivery, but sites like Hazelton Farm can benefit from other local strategic delivery rather than starting new and expensive strategic transport projects in new areas.
- 13.3 Northbrook Park is the most constrained site option in the consultation document. Northbrook Park is also the least accessible, at the greatest distance from any suitable settlement and therefore the least suitable choice for large scale development. The Bentley Action Group is not convinced that proposed benefits of the Northbrook Park option are capable of outweighing any of the harm identified, or that the constraints can realistically be mitigated in a viable and deliverable way.
- 13.4 The Bentley Action Group therefore suggests that the proposed allocation at Northbrook Park is removed from the plan and is replaced with one of the other, more appropriate alternatives such as: Whitehill & Bordon, Neatham Down, or sites near South Medstead and Four Marks.

Annex A: Previous Bentley Action Group consultation comments.

**EAST HAMPSHIRE
DRAFT LOCAL PLAN 2017 - 2036
REGULATION 18 CONSULTATION**

**RESPONSE ON BEHALF
OF
THE BENTLEY ACTION GROUP**

Carter Jonas

MARCH 2019

Annex A

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Annex A

1.0 INTRODUCTION

- 1.1 Carter Jonas is instructed by the Bentley Action Group to respond to East Hampshire District Council's ("the Council") Regulation 18 Draft Local Plan Consultation.
- 1.2 The consultation document and supporting evidence documents have been reviewed. It is acknowledged that there is still opportunity for work to be undertaken by the Council in terms of evidence to support the plan and in the formulation of appropriate policies. It is clear, however, that significant work is required and raised hereunder are several concerns about the strength and rigour of the Draft Local Plan.
- 1.3 Bentley Action Group is particularly concerned about the approach the council has taken to identifying the 'strategic development' location at Northbrook Park under draft policy SA21. It is considered unlikely that the allocation and its supporting policy would be considered sound as part of a final published local plan, therefore this submission is in objection to the draft allocation and it is suggested that Northbrook Park is removed from the draft plan and a reasonable alternative is used in its place.

2.0 LAND AT NORTHBROOK PARK

- 2.1 The proposed site allocation (Site SA21 - Land at Northbrook Park) is on land that is currently considered to be the 'open countryside' beyond the settlement boundary of Bentley and adjacent to the administrative boundary with Waverley Borough Council.

Neighbourhood Planning

- 2.2 There is a 'made' Neighbourhood Plan (NP) in the parish of Bentley within which the site is located. However, there is limited reference to the NP within the draft Local Plan. The clearest indication of the effect that the proposals in the Draft Local Plan will have on the NP is that in the introduction it is suggested that the Neighbourhood Plan might need to be reviewed. This appears to undermine the role of the NP as part of the development plan and the clear vision and objectives that it contains.
- 2.3 It is not clear what provisions there are in place, between the Council and the Parish Council, to facilitate a review of the NP but, should the development remain a proposed allocation, additional time and resource should be allocated to the Parish Council to ensure that the local community has the best possible opportunity to help shape the way the development might be delivered.

Duty to co-operate

- 2.4 There is very limited record of constructive stakeholder engagement and agreement regarding Northbrook Park, in or supporting the Draft Local Plan. Nothing is reported regarding dialogue with Bentley Parish Council and the Neighbourhood Plan group. The duty-to-co-operate evidence states the following regarding Northbrook Park:

4.10 ...Whilst the proposed allocation is within East Hampshire District Boundary, it is close to the administrative boundary with Waverley Borough. The Local Planning Authority is aware of opportunities for a larger new settlement by incorporating adjacent land, some of which is in the same ownership. The Local Planning Authority has started dialogue with Waverley Borough Council on this matter, which will continue, and include Surrey County Council (particularly in relation to highways and education).

Further collaboration

Review draft Local Plan consultation response from Waverley Borough Council and Surrey County Council and continue dialogue. Need to further consider cross boundary infrastructure requirements and provision, including dialogue with Surrey County Council as Highways Authority and Education provider.

2.5 There appears to be significant work to do with partner authorities to understand the impacts and opportunities of the site, and this will need to be further explored and reported upon before any plan can be published, to fully scrutinise the soundness of the proposed allocation. It is also suggested that the potential impact on views to and from the South Downs National Park will require that that planning authority will also need to be part of the work required to discharge the provisions of the duty.

2.6 The lack of any current “meaningful outcome” from the duty to co-operate provides little confidence that the site is genuinely deliverable.

Overall justification

2.7 The justification for the draft allocation appears to be that it will provide a sustainable new settlement. The draft policy states the following:

A new settlement presents the opportunity to be ambitious, achieving the highest standards of design, the most sustainable development layouts and the most inclusive and positive communities, supported by innovative technologies and modern approaches to infrastructure.

Concentrating a large proportion of development on one site will help prevent sporadic development across the Area, which has a greater impact on infrastructure, and a tendency to concentrate where existing infrastructure is already stretched.

2.8 It is not clear, however, how a development of 800 dwellings will deliver the suggested benefits. First, high design standards and appropriate site layout can be achieved on any site regardless of its size. Second, given that the site is located in what is currently open countryside it is not convincing to suggest that it will be an inclusive (and connected) location. Third and finally, the evidence presented in the “Infrastructure Plan” – the need for at least one new primary school; undefined “new community

facilities”; a Suitable Alternative Natural Greenspace (SANG); improvements to the Wastewater Treatment Works at Bentley, which is currently at capacity; and a major new site road access (there is no mention of other likely transport improvements) – does not robustly demonstrate that the necessary infrastructure – let alone innovative and modern approaches to such – can actually be **viably** delivered as part of a scheme for 800 dwellings and 6 ha of employment.

- 2.9 Furthermore, contrary to the assertion that development on a single site will reduce infrastructure impact, the proposed allocation will create a draw on infrastructure from a number of surrounding settlements and also increase the pressure on the A31 road.
- 2.10 Draft policy SA21 reports the conclusions of the Land Availability Assessment (LAA). Northbrook Park is given the reference LAA/BEN-007 in the LAA and is assessed on three criteria; suitability, availability and deliverability and each of those is considered hereunder in relation to the scale of the effect, but also the appropriate drafting of the policy.

Suitability

- 2.11 Constraints are listed in the LAA and the draft policy including:
- the need to improve transport infrastructure and access;
 - the presence of flood risk and flood zones (FZ) 2 and 3 on part of the site;
 - the need for suitable alternative natural greenspace (SANG);
 - impacts upon Sites of Importance for Nature Conservation (SINCs);
 - ancient woodland; and,
 - listed buildings.

A brief summary of each constraint is considered in the following paragraphs, with some considered in further detail in preceding sections.

- 2.12 A more detailed response regarding transport impact is given below, however, in short it is not considered that the cumulative impact has been properly considered, that impacts have been fully understood or the appropriate mitigation identified. A single line in a draft policy that suggests improvements will be required is unlikely to provide a robust and reasonable argument.
- 2.13 Flood risk on the site appears to rule out around a third of the draft allocation. A cursory review of the Government’s flood map suggests that the majority of the land south of the A31 is either in FZ 2 or 3 where development should be avoided. There also appears to be a discrepancy in the recording of FZ 2 in particular, as it stops at the Waverley side of the council administrative boundary, for no discernible mapped reason. It is suggested that further work is carried out to understand the extent of flood risk, and that development south of the A31 is ruled out as a minimum. In this regard, there is also a considerable amount of local knowledge as to the extent and severity of surface water/fluvial flooding that would need to be appropriately mitigated should development in this location continue to be pursued.

- 2.14 Biodiversity is considered in greater detail below, but similarly to the transport matters, there appears to be a gap in the evidence base in fully considering the cumulative impacts of the proposed allocations and those in Waverley Borough. It is considered necessary that evidence is provided that demonstrates that a SANG can be delivered on the draft allocation site. The potential land take of a SANG and the protection of ancient woodland will (further to the flood risk) reduce the developable land on the proposed site. This raises serious doubts regarding the capacity and deliverability of the draft allocation.
- 2.15 The presence of Heritage Assets at Northbrook Park is recognised in the LAA and draft policy. However, the treatment of heritage assets in the draft policy lacks rigour and risks the soundness of the allocation. It is not sufficient to state that the design of development “...should not adversely affect the setting of the listed buildings.” The significance of the heritage assets should be better understood at the plan drafting stage to inform the subsequent delivery of the site. The policy should make it clear that the assets and their setting should be conserved and enhanced.

Availability and deliverability

- 2.16 The availability of the site is not disputed, but whether there is sufficient land available to deliver all the necessary and desired homes, employment and infrastructure is debateable. This is especially the case given the range of constraints and the number of facilities and services that are required.
- 2.17 It is particularly disappointing to read in the LAA – regarding Northbrook Park (LAA/BEN-007) – the following comments regarding viability:

This site is proposed for a sizable new settlement that is of a scale that has not been tested through the Interim Local Plan Viability Assessment notional site assessments. Due to the scale of development proposed, the associated infrastructure requirements and the site-specific nature of site constraints that impact viability, further detailed site-specific viability work will be required to determine whether the proposed development is viable.

- 2.18 It is clear that a significant amount of work is required from the council to understand if the Northbrook Park site is actually viably deliverable. It is suggested above in these representations that the amount of necessary infrastructure is not yet properly understood and it is also noted that the cost of what is known so far is not yet recorded in the Infrastructure Plan. The Bentley Action Group’s contention is that the site, as proposed, is not viable. Notwithstanding this view, in order for the Local Plan to be considered sound, upon submission further detail about the necessary utility, social and environmental infrastructure must be known and made available. The cost of the infrastructure will need to be understood and also to ensure conformity with national policy (e.g. NPPF paragraphs 57 and 67) the site will need to be demonstrably viable and deliverable within the plan period.

3.0 SUSTAINABILITY

3.1 The Council has commissioned Aecom to undertake a comprehensive Sustainability Appraisal. It is a reasonably robust piece of work to date, and contains some recommendations for the council, of which they should take close note. It is not entirely clear why the option for Northbrook Park has been selected instead of the reasonable alternatives. This is especially because as a ‘stand-alone’ new settlement it may not perform as well as other locations given the likely high levels of out commuting, the impacts on heritage and the effects on the landscape. The Sustainability Appraisal (SA) is considered in more detail below.

3.2 The scale of the proposal at Northbrook, and whether there is actually a deliverable development – including the necessary infrastructure – is questioned in the SA in the same way that has been highlighted in these representations:

5.46 *A scheme has been proposed on BEN-007 involving at least 800 homes plus supporting infrastructure; however, a preferable option would involve a larger scheme, also taking-in adjoining land to the east (within Waverley Borough) and/or west...*

5.47 *Any scheme would include a primary school, and new employment is also proposed. Suitable Alternative Natural Greenspace (SANG) would also be required, given proximity to the Thames Basin Heaths Special Protection Area (SPA).*

3.3 Significant heritage and environmental constraints are identified in the SA. It is suggested that these, taken together, could be sufficient to render development inappropriate. If appropriate development can be achieved, it is clear that substantial mitigation would be required that would affect the amount of land available for development and the proposal’s overall viability. As already suggested in these representations, at the very least, the draft policy for Northbrook Park will require redrafting to ensure its rigour:

5.48 *The promoted site currently hosts a significant country estate which is principally used as a wedding and events venue. This estate includes a number of listed buildings (Grade II) that originally enjoyed a rural setting, but some are now in close proximity to employment uses.*

5.49 *The rest of the area remains largely undeveloped and includes areas of floodplain (south of the A31) and woodland, including an area of ancient woodland, with further ancient woodland SINCS adjacent. As with many parts of the Wey Valley, the southern parts of the “area of search” are also subject to groundwater flood risk.*

3.4 The SA refers to the fact that there are significant constraints at Northbrook. It also contains comment that is similar to the concerns of the Bentley Action Group; development at Northbrook Park is likely to rely on surrounding infrastructure and not

supply sufficient of its own, and this is especially at the scale proposed in the draft plan. This desire to see further development is also noted as being despite the limited local need. Furthermore the fact that there are significant evidence gaps about the deliverability of the overall proposal has hindered the SA:

5.80 *The final residential/mixed use site option is the Northbrook Park new settlement “area of search”, which has already been introduced above. In short, the area of search is subject to significant constraints, but warrants further consideration given the potential to deliver a mix of uses and new/upgraded infrastructure, as well as given good links to Farnham and the strategic road network. Initial indications are that any new settlement could deliver c.800 homes in this plan period (post-2036), with further housing beyond the plan period.*

3.5 It is confirmed in the SA that the amount of flood risk at Northbrook Park is sufficient to significantly reduce the developable area, and that the local communities’ concerns about significant surface water flooding is also very valid:

9.23 *At site SA21 (Land at Northbrook Park), flood risk is a more significant issue as the River Wey flows through the site’s southern extent. Consequently, an area of Flood Zone 3 affects the south of the site, and this will prevent almost all forms of development from coming forward here. Elsewhere within the site fluvial flood risk is not a factor, though there are localised areas of high surface water flood risk throughout the site, and much of the centre of the site is within an area of high groundwater flood risk.*

3.6 The Bentley Action Group is in full agreement with the very serious concerns identified in the SA regarding the car dependency of the proposed site and the worrying lack of alternatives (e.g. practicalities of cycle/footpath links with Bentley Station and the infrequent, slow bus routes to Farnham) that have been considered through the plan making process:

9.44 *Site SA21 (Land at Northbrook Park) is notable as there is almost no reference to provision of sustainable transport through the development process. The supporting text references the opportunity to deliver “sustainable development layouts” which could feasibly incorporate opportunities for walking and cycling within the development. However, there is no reference to opportunities or constraints associated with the site’s relatively rural location, located beyond traditional walking and cycling thresholds from surrounding services and facilities. The site allocation text does not recognise potential opportunities to enhance cycle connectivity between the site and Bentley station and nor does it acknowledge or propose mitigation to the likely car dependency of the site. Regular bus services run along the A31 between Farnham and Alton and there could be potential to extend or alter existing routes to serve the Northbrook Park site directly though this is also not considered.*

3.7 Where heritage impacts are considered in detail in the SA the high level of potential harm becomes apparent. Also of note, is that the likely mitigation will also reduce the developable area still further after flood risk is taken into account:

9.92 *By contrast, strategic development of up to 800 dwellings at Northbrook Park would likely affect the cluster of prominent listed buildings associated with the wedding venue and hotel in the former stately home and country estate on the site. The current undeveloped setting of the listed buildings contributes to their intrinsic historic character and it can be expected that urbanisation of the area would likely affect this historic setting. However, because the boundaries of the new settlement have not been finalised, there remains significant potential to secure a sympathetic layout for new housing and community facilities at Northbrook Park.*

9.97 *Site SA21 (Land at Northbrook Park) identifies that heritage constraints on site include listed buildings, though there is little discussion of the broader historic rural character of the site's setting. The need to mitigate harm to the intrinsic historic character of assets on site is noted individually, though the potential cumulative challenge of achieving this in combination with all other constraints is not acknowledged.*

3.8 Moreover, the Bentley Action Group has it good authority that there is evidence of a pre Roman fort on the lower slopes of the Northbrook site, between the A31 and the river, where the developer is proposing to locate the employment development. The Action Group understands also that this fort is known to the Hampshire County Archaeologist. This is likely to reduce the developable area being promoted by the developer.

3.9 The Bentley Action Group has already raised in these representations concerns about the effect of the proposed development on the open countryside and the general pattern of local development. The SA notes that the site is constrained and would likely result in the loss of rural tranquillity that is a particular value of this locale and very important to the community of East Hampshire:

9.135 *Site SA21 (Land at Northbrook Park) is notable in that it is constrained in both landscape and townscape terms. The Landscape Capacity Study proposes that the “overall management objective should be to conserve the tranquil, natural character of the Northern Wey Valley”, a challenging objective in the context of developing a new settlement. Indeed, the study goes on to state that “new development or large scale change...would be highly visible”. Whilst the retention and expansion of green infrastructure, in accordance with the character of the area, could mitigate visual impacts it is highly likely that the allocated of up to 800 dwellings will result in a loss of rural tranquillity at Northbrook Park and its immediate environs. The need to avoid adversely affecting the setting of the listed buildings on site and the “need to reflect landscape matters” is noted individually, though the potential cumulative*

challenge of achieving this in combination with all other constraints is not acknowledged.

- 3.10 There is reference in the SA to the quality of the agricultural land and it is identified as being grade three. There is a risk that if the Local Plan does not identify suitable mitigation of alternatives to developing on good quality agricultural land it could be contrary to the NPPF at paragraph 170:

9.147 ... Northbrook Park is within Grade 3 agricultural land, though little of the area is currently in productive agricultural use.

- 3.11 The concluding paragraphs of the SA sum up well, the most significant challenges faced by the Council in proposing the allocation of Northbrook Park. The location is unlikely to be sustainable, or could be made to be sustainable, because it will be heavily car dependent. There will also be significant landscape and countryside impacts of the proposals (especially given its elevated position above the river valley) that it will be difficult to resolve. Furthermore, taking the landscape mitigation, the heritage mitigation and the significant area of flood risk away from the developable area of the proposed site allocation raises very serious questions about the overall capacity of the site to deliver homes, employment and supporting services and facilities:

Page 144 ... Northbrook Park would likely be car dependent for access to many services, despite the potential to deliver some local services within the site. It is recognised that Northbrook Park is relatively close to Bentley station and is linked by an existing cycle route, though walking is unlikely to be a practical option for station access. Regular bus services run along the A31 between Farnham and Alton and there could be potential to extend or alter existing routes to serve the Northbrook Park site directly. However, it is considered that the short journey to Farnham would continue to be tempting to make by car, and private vehicles would likely remain the primary means of accessing nearby service centres.

Page 153 ...the Landscape Capacity Study proposes that the “overall management objective should be to conserve the tranquil, natural character of the Northern Wey Valley” which would be more difficult in the context of developing a new settlement, with new facilities and services, close to the border with Waverley Borough. Indeed, the study goes on to state that “[a]ny new development or large scale change...would be highly visible”. However, the retention and expansion of green infrastructure, in accordance with the character of the area, could mitigate visual impacts. This area includes the historic St Swithun’s Way long distance footpath, which represents a pilgrim’s route between Winchester and Canterbury, and this provides a further constraint for urbanising development that would adversely affect the rural character of the Wey Valley.

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

Reasonable alternatives

- 3.12 Councils, through their SA, are required to assess reasonable alternatives to their strategy. This exercise is to demonstrate that the strategy that is eventually chosen is, or can be made to be, sustainable. There is no requirement to choose ‘the most’ sustainable option, but there should be robust and ‘sound’ reasons for taking the decision that is included in the Local Plan. The Council has considered five alternatives for strategic growth locations including Northbrook Park:
- 5.39 The following five strategic site options have been identified (in rough descending scale-order):
- Chawton Park Farm (A31 west of Alton)
 - Northbrook Park (A31 east of Bentley)
 - East of Horndean (southern extension to existing permitted ‘East of Horndean’ permitted site)
 - Whitehall & Bordon (continued strategic expansion)
 - Ropley (broad area north of the village)
- 3.13 Each of the alternatives has been assessed to a similar level of detail as Northbrook Park, and the summary of these assessments is shown in a ‘traffic light’ table in the SA. Noting that there is no requirement to choose ‘the most’ sustainable option, it is still concerning to note that Northbrook Park has the highest number of ‘reds’ and ‘ambers’ recorded against it compared to the alternatives.
- 3.14 The overall summary assessment against SA objectives is shown at *Table A: Summary Findings of the GIS Analysis*, which is reproduced at **Annex A** to this submission.
- 3.15 It would appear that the option at Horndean has the greatest access to services and facilities, which is described as a key component of sustainable development in the draft Local Plan and that the option at Ropley has the least impact on landscape, biodiversity and heritage assets. It is respectfully suggested, therefore that further work is undertaken by the Council to demonstrate why these two options, in particular, are not more greatly favoured for development allocations and certainly ahead of the proposals at Northbrook Park.

4.0 BIODIVERSITY/HABITATS REGULATIONS ASSESSMENT

- 4.1 The Council has published an interim Habitats Regulations Assessment (HRA). This generally follows the required methodology for such documents and concludes that there is the potential for “Likely Significance Effects” if SA21 Northbrook Park is allocated. Further detail is provided at paragraph 10.5.6:

One housing allocation, SA21 Land at Northbrook Park, is located approximately 4.0km from Thames Basin Heaths SPA. As such, it would not otherwise be required to provide mitigation if not captured by Policy S21. This accounts for at least 800 new dwellings, which have the potential to increase recreational pressure on the Thames Basin Heaths SPA.

- 4.2 There are, however, some significant flaws in the HRA regarding the assessment of cumulative effects. There is no reference to the Waverley Local Plan and there appears to be no account taken of the growth plans around Farnham and particularly the potential effects on air quality and recreational pressure.
- 4.3 There is the potential that the HRA is contrary to the findings of Mr Justice Jay in the Court of Appeal - [2017] EWHC 351 (Admin): Wealden DC *et al* vs. Natural England. In his judgement Mr Justice Jay explained that the Conservation of Habitats and Species Regulations 2010 set out the Habitats Regulations Assessment regime. They require that, where a plan or project is “likely to have a significant effect on any European site either alone or in combination with other plans or projects” then an appropriate assessment is required. It might be that the East Hampshire Plan alone has a significant effect requiring an appropriate assessment, but the scale of effect will need to be understood with adjacent plans and programmes. This particularly the case with the proposed site at Northbrook Park which is located adjacent to the Waverley Council boundary.
- 4.4 The identified need for a Suitable Alternative Natural Greenspace (SANG) as a result of proposed development at Northbrook Park is understood. However, having regard to the Natural England guidance, it is not clear how the Council expects the SANG to be delivered. There is little information about quality, accessibility, visitor management or how it should form part of the wider Green Infrastructure Network for the district. Furthermore, and as has been questioned in terms of other mitigation, it is unclear if there is available land for the SANG or if it will also count as further undevelopable land within the proposed allocation site at Northbrook Park.
- 4.5 Furthermore, the proposed allocation has the potential to compromise a range of locally important biodiversity: There are four woodlands, designated as Sites of Importance for Nature Conservation (SINC) to the immediate north of Northbrook, a scarce habitat on the northern valley slope. These, and other lower level but good quality areas of undisturbed green infrastructure in and around the proposed Northbrook Park site, are included in Local Ecological Network (LEN) and a Biodiversity Opportunity Area (BOA). Whilst the LEN and BOA are non-statutory natural conservation designations, in the case of the Northern Wey valley they also

coincide with the “blue and green corridor” established by the Council’s Green Infrastructure Strategy and policy intended to deliver bioregional eco-services.

5.0 TRANSPORT

- 5.1 Similarly to other work that the Council is currently undertaking, it appears that there is a significant amount of transport assessment and mitigation testing to do, before the Local Plan can be published for its final consultation. The transport assessment that has been published in support of this iteration of the Local Plan is limited in its scope. It is very difficult to take any meaningful conclusions from this ‘baseline setting’ report. It is concerning to note that there is limited recording of transport flows in the specific location of the proposed Northbrook Park allocation.
- 5.2 It is not clear how much joint transport work has been undertaken especially regarding the A31. Given that the proposed allocation at Northbrook Park is adjacent to Waverley and so close to Farnham this is a weakness of the current evidence base.
- 5.3 There is strong local concern that the proposed development at Northbrook Park will bring significant adverse transport impacts. This is with the site access proposed directly onto the A31 and the increased pressure on traffic flows on the A31 especially at peak periods. Away from the A31 the remaining transport network around the Northbrook Park area is very rural in nature and will require significant upgrading in order to support a development of the scale that is proposed.
- 5.4 As is highlighted above in these representations the SA identifies that the Northbrook Park proposal is “...likely to be car dependent for access to many services, despite the potential to deliver some local services within the site.” The SA also identifies that there is limited connection between the site and any sustainable forms of transport.
- 5.5 The level of data currently available does not provide a convincing case that the site is either accessible or sustainable. Further work – including jointly with Waverley – is necessary to support the proposals at Northbrook Park but the Bentley Action Group remains unconvinced that an appropriate transport package, including for alternatives other than the private car can be achieved at the proposed location.

6.0 OTHER MAJOR INFRASTRUCTURE

- 6.1 There is very limited information about the necessary infrastructure to support the proposed allocation at Northbrook Park. As is highlighted in these representations in response to the overall justification for the development, the current Infrastructure Plan is inadequate and obviously unfinished.
- 6.2 The Infrastructure Plan identifies a need for at least one new primary school; undefined “new community facilities”; a Suitable Alternative Natural Greenspace (SANG); improvements to the Wastewater Treatment Works at Bentley; and a major new site

road access. This is obviously not an exhaustive list (e.g. community surgery) and it is clear that further work is necessary.

7.0 CHARACTER & LANDSCAPE

7.1 A new settlement in the open countryside will significantly change the pattern of development in the area. This would be to the detriment of the local landscape character and especially local tranquillity.

7.2 As reviewed earlier in these representations the SA identified some significant landscape constraints, particularly in the Northern Wey Valley, to the proposed development. There is the potential to adversely impact a number of views from historic public footpaths, and the SA identifies that the site may well impact a National Park.

7.3 There is a significant risk that the allocation of Northbrook Park is contrary to the NPPF at paragraph 170:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

7.4 The potential impact of views to and from the South Downs National Park could also conflict with the NPPF at paragraph 172:

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.

8.0 CONSIDERATION OF THE SITE BY WAVERLEY BOROUGH COUNCIL

8.1 In considering the suitability (or otherwise) of the Northbrook Park proposal, it is also telling to report the findings of Waverley Borough Council's *Farnham Housing Land Availability Assessment – sites not included as housing allocations following assessment* (December 2018) ("Farnham HLAA"), which was part of the evidence base for the now adopted [in February 2018] *Waverley Borough Council Local Plan Part 1: Strategic Policies and Sites*. The Northbrook Park promoter put the same site forward

for inclusion in that plan. However, in rejecting the site, the Farnham HLAA concluded that:

A significant development of 15.3ha set in open countryside removed from Farnham and extending beyond the Parish boundary into East Hampshire would have a significant detrimental effect on the landscape of high sensitivity.

The site is promoted by the landowner. The site is removed from Farnham and would be likely to require significant advanced infrastructure investment. No evidence has been produced to confirm the viability of this new settlement. Sales of a substantial development such as this may be slower than over a variety of sites.

The site is available. However, this proposed new settlement is remote from Farnham and therefore a significant distance from services. The viability of significant advanced infrastructure investment, and the services to be provided as part of the development, is not known. This substantial proposal in open countryside and removed from Farnham would have a significant detrimental effect on the landscape of high sensitivity on this approach to the town. The scale of development is not required during the plan period to meet the identified housing need. A new settlement would not represent an appropriate strategy to accommodate development taking into account the reasonable alternative of brownfield sites in more sustainable locations. The site is unsuitable and potentially unachievable as a housing allocation.

(Our emphasis)

8.2 Having regard to the arguments set out in this submission and in Waverley's recent assessment, as reported above, it is difficult to see how East Hampshire District Council can come to anything other than the same conclusion – Northbrook Park is unsuitable as a housing allocation.

9.0 CONCLUSION

9.1 The Bentley Action Group is not convinced that the proposed allocation of Northbrook Park for major development is sustainable. It is not justified appropriately by the Council and it is certainly not favourable when considered alongside the reasonable alternatives that have been tested through the Council's evidence. It is also telling, and material to consideration of the site by East Hampshire District Council, that the site was rejected comprehensively by Waverley Borough Council as part of its site assessment work for the recently adopted *Waverley Borough Council Local Plan Part 1: Strategic Policies and Sites*.

9.2 There are significant evidence gaps that the Council must seek to remedy before the next iteration of the Local Plan is available for comment. Notwithstanding this, it is considered that a predominantly car based scheme, such as that proposed at

Northbrook Park, cannot be made to be sustainable and that the level of supporting infrastructure required cannot be viably delivered.

- 9.3 The Bentley Action Group therefore suggests that the proposed allocation at Northbrook Park is removed from the plan and is replaced with one of the other, more appropriate alternatives cited in the Council's supporting evidence.

Annex A

ANNEX A: Sustainability Appraisal (SA) of the emerging East Hampshire Local Plan - Summary findings (excerpt).

Reproduced below are excerpts taken from the Sustainability Appraisal (SA) of the emerging East Hampshire Local Plan, interim report (December 2018). These excerpts are all taken from “Table A: Summary findings of the GIS analysis” (pages: 121, 123, 127, 135, 137 & 138).

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
BEN-003	Land east of Hole Lane, Bentley	Bentley	Red	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Yellow	Green	Green	Green
BEN-004	Land west of Hole Lane, Bentley	Bentley	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green
BEN-005	Land west of Rectory Lane, Bentley	Bentley	Red	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Red	Green	Red	Green
BEN-006	Land east of Rectory Lane, Bentley	Bentley	Red	Green	Green	Yellow	Yellow	Yellow	Red	Green	Green	Red	Green	Red	Green
BEN-007	Northbrook Park	Bentley	Red	Red	Red	Red	Green	Green	Red	Red	Yellow	Red	Green	Green	Green
CHA-004	Land at Chawton Park Farm, Site 1, Alton	Chawton	Red	Yellow	Yellow	Yellow	Green	Green	Red	Red	Green	Yellow	Green	Green	Green
CHA-005	Land at Chawton Park Farm, Alton	Chawton	Red	Yellow	Yellow	Red	Green	Green	Red	Red	Green	Red	Green	Green	Green
CHA-006	Land at Chawton Park - Employment	Chawton	Red	Yellow	Yellow	Yellow	Green	Green	Red	Yellow	Green	Green	Green	Green	Yellow
HD-023	Land east of Hordean	Hordean	Green	Yellow	Green	Red	Green	Green	Red	Yellow	Green	Red	Green	Green	Green
ROP-007	Land at Ropley	Ropley	Red	Green	Red	Green	Green	Green	Red	Yellow	Green	Yellow	Green	Green	Green
WHI-001	Land south of Walldown Road, Whitehill	Whitehill	Yellow	Green	Yellow	Red	Red	Red	Red	Green	Green	Green	Yellow	Green	Green
WHI-002	Land at Watermeadow Farm, Lindford, Bordon	Whitehill	Yellow	Green	Green	Green	Yellow	Yellow	Yellow	Green	Yellow	Red	Green	Red	Green
WHI-003	Land rear of The Royal Oak, Hollywater	Whitehill	Yellow	Yellow	Yellow	Red	Red	Red	Red	Green	Green	Yellow	Green	Green	Green
WHI-004	Former Garrison Church, Bordon	Whitehill	Yellow	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green
WHI-005	Mill Chase Academy and Leisure Centre, Whitehill Bordon	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green
WHI-006	Enterprise Zone (increased employment)	Whitehill	Yellow	Red	Yellow	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green
WHI-007	Oxney Farm SANG	Whitehill	Yellow	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Green	Green	Red	Green
WHI-008	BOSC Village	Whitehill	Red	Red	Yellow	Yellow	Yellow	Yellow	Red	Green	Green	Green	Yellow	Green	Green
WHI-009	Annington Estate, Essex Close	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green
WHI-010	Annington Estate, BOSC South	Whitehill	Yellow	Red	Yellow	Yellow	Yellow	Yellow	Red	Green	Green	Green	Red	Green	Green
WHI-011	Annington Estate, BOSC North	Whitehill	Yellow	Red	Yellow	Yellow	Yellow	Yellow	Red	Green	Green	Green	Red	Green	Green
WHI-012	SLAB SANG, Oakhanger Road	Whitehill	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green
WHI-013	The Croft, Hogmoor Road	Whitehill	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green
WHI-014	Sacred Heart Church and nursery, High Street	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green
WHI-015	Building 84,	Whitehill	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Red	Green	Green	Green	Yellow	Green	Green
WHI-016	Town Centre Phase 1	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green
WHI-017	Town Centre Phase 2	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green

Bentley Parish Council's - comments for EHDC large site consultation

clerk@bentleyparishcouncil.co.uk

Mon 14/10/2019 09:38

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (143 KB)

Bentley Parish Council_Local Plan_2nd Consulation comment v3.pdf;

To whom it may concern;

Please find attached Bentley Parish Council's comments for the second consultation of EHDC's Local Plan for larger sites.

Kind Regards


Clerk & Financial Officer to Bentley Parish Council

Bentley Memorial Hall

Hole Lane

Farnham

GU10 5LB


Office Hours: Monday to Thursday 9am to 15:00

Closed during bank holidays and Public Holidays

Bentley Parish Council Comment on the EHDC draft Local Plan “Large Sites”

1. As part of the EHDC draft Local Plan “Large Sites” Public Consultation, Bentley Parish Council has considered the EHDC Consultation Document and Background paper as it affects the Parish of Bentley. This comment has been informed by a study from John Slater Planning Ltd., commissioned by the Parish Council for the first public consultation during February and March 2019 and which specifically considered Site SA 21, the proposed new settlement at Northbrook Park.
2. The criteria for new settlements according to National Planning Policy Framework is for settlements which are well located, well designed, supported by necessary infrastructure and with economic potential.
3. Applying these criteria to the settlement proposed at Northbrook, we have concerns over its:
 - Location;
 - Effect on the existing village of Bentley;
 - Lack of transport links and impact on traffic;
 - Effect on environment and landscape;and
 - Infrastructure and design.

Location

4. The location of the new settlement on the north east edge of East Hants is not optimal and provides little benefit to the District – save that it fulfils a housing allocation need.
5. We welcome the inclusion of further large sites for consideration in drawing up the draft Local Plan and believe that there are alternative locations for new settlements which would be far more beneficial to East Hants. Chawton Park, for example, is a site of similar size, is close to Alton and appears to have several advantages. For example, it provides affordable housing that is closer to a larger settlement, enabling new residents to maintain contact with friends and family in Alton; it has better access to secondary schooling; its infrastructure and services can draw on the proximity to Alton; it creates better employment opportunities– opportunities that are also more centrally situated and of more benefit to East Hants generally (rather than the adjoining district of Waverley).
6. Under the Northbrook proposal, the proposed public transport links (e.g. to railway stations and local shops) expose the isolated nature of the Northbrook site. This will place more load on local roads as well as on parking at Farnham and Bentley stations. Bentley Station parking is already beyond capacity so that travellers outside peak hours are unable to park there.
7. For these reasons we request that the location of a new settlement in East Hants be reconsidered and that further analysis be done on alternative sites.

Effect on the existing village of Bentley

8. We note that this consultation is focused only on the selection of 2 large development sites (i.e. over 600 homes) to be incorporated in the Local Plan. It does not consider smaller LAA registered sites including the 13 sites around Bentley village.

9. We acknowledge that a new settlement at Northbrook Park could, provided it is properly planned and implemented, relieve some of the increasing pressure on existing services in and the infrastructure of the village of Bentley, for example, if a new surgery is included in the Northbrook development.
10. However, there is no confirmation of medical facilities on the new development and this is a worrying omission. There appears to be an implicit assumption that the existing Bentley Surgery can and will take on residents of the Northbrook Park settlement. This is not acceptable or realistic given the large numbers involved. We need explicit details of plans for medical facilities at Northbrook Park for new residents if the development is to go ahead.
11. We welcome the proposal for a new primary school but would like more detail on how this would be implemented and managed. We are concerned that the implications of funding a new school could mean that it is delivered in later phases, meaning that Bentley Primary School would need to provide places for children arriving in the early phases. This in turn would limit places for children in neighbouring communities such as Froyle. We would expect to see modelling of the impact on neighbouring schools, and proposals for how catchment areas will be drawn. We would also like to understand whether the school would be maintained by the local authority or whether it would be some other model: an academy or free school, for instance. In the latter cases we would like to understand how the academy trust or sponsor will be selected.
12. We have concerns regarding the political and administrative relationship of a new settlement at Northbrook Park with Bentley Parish – particularly in view of the number of houses involved. We believe the administrative structure would need to be clearly defined before the Local Plan is adopted to protect the interests of the existing residents of the parish. It could potentially involve the creation of a new parish for Northbrook.

Lack of transport links and impact on traffic

13. The most severe traffic impact from the proposed Northbrook Park development will be felt beyond Bentley. However, many residents in the parish have to negotiate the Coxbridge Roundabout and the Farnham By-pass on a regular basis. With a development of this size in this location, those residents can expect further delays travelling to and beyond Farnham.
14. In Bentley, we are starting to see an increase in traffic through the village towards Coxbridge from the Whitehill and Bordon development (Bentley Traffic Survey, 2018), which will only increase with the bulk of the housing there still to be built. We also note an increase in cross-country traffic north from the village towards Crondall.
15. We accept that traffic at Coxbridge will also increase through further development in Alton and it is possible that if a new settlement were to be built at Chawton Park, then there would be some additional traffic on the A31 at Coxbridge. However, there are better north/south road connections and better local facilities in Alton that we feel would reduce the overall eastward flow of traffic. We believe a solution to the traffic bottleneck at Coxbridge, regardless of development at Northbrook Park, needs to be found through a thorough and robust transport assessment between Hampshire and Waverley.

Effect on environment and landscape

16. We are concerned about views from the South Downs National Park, adjacent to the southern boundary of the site, and views along the Wey Valley itself. Whilst the main site, north of the A31, will be less visible from the surrounding countryside, we are opposed to

development in the immediate Wey Valley south of the A31 at Northbrook on aesthetic and environmental grounds.

17. The Local Plan's Landscape Character Assessment identifies the Northern Wey River Corridor landscape as characterised by riverside pastures and includes an objective to "conserve the tranquil/natural character". Use of land at Northbrook to the south of A31 as an employment site is extremely undesirable. It would introduce industrial buildings into a rural landscape at the entry point into Hampshire. It would also put a strain on an important wildlife corridor along the River Wey water meadows.
18. We also question the need for an employment site given that there is a similar site at Coxbridge, only 1.3 miles to the east, where there are currently 6 units either for sale or rent.
19. Whilst we recognise that from the Environment Agency mapping the development south of the A31 is not proposed on Flood Zones 2 & 3 areas, we observe that part of that development sits in Flood Zone 1. There would need to be a detailed investigation on the impact of surface water run-off from the main development.
20. The new settlement will lie within 5 km of the Thames Heath Special Protection Area, and the Wealden Heath SPA, which are both habitats with the highest level of ecological protection. We are not satisfied that the proposed SANG is sufficient protection and urge that no construction takes place to the south of the A31.
21. There are a number of high quality bio-diversity recognised sites within the immediate vicinity of the new settlement. It is inevitable that, with so many residents in such close proximity to these habitats (which include SINC's), there is potential for them to be adversely affected by increased public access. Specific proposals will be required to protect or provide mitigation for protected species.
22. The northern boundary of the site abuts ancient woodland, which is an "irreplaceable natural asset" as described in the NPPF. Under the NPPF, further "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons". We are, therefore, concerned that there is insufficient buffering (15m) to these woodlands and require assurances that they will continue to be protected.

Infrastructure and Design

23. We are concerned that the proposed housing densities, e.g. 130 dwellings in 2.9Ha, and design; the proposal includes 2, 2.5 and 3 storey housing (Land at Northbrook Park, Fabrik, Jun 18) will lead to an urbanised rather than rural aspect in the proposed settlement. We feel this high density of housing is unsuitable in a rural location, particularly if it were to cause the affordable housing to be squeezed into a cramped space.
24. We are extremely concerned by the lack of mains sewage drainage on the site. According to Thames Water and South East Water it appears that Northbrook Park is currently reliant on local septic tanks and soakaways and is not formally connected to mains drainage.
25. The site is further constrained by the need to protect the Grade II listed building (Northbrook House) and its environs at the centre of the site (see below).
26. We are in any event concerned about the future of Northbrook House which is currently a wedding venue. The Master Plan (Land at Northbrook Park, Fabrik, Jun 18) suggests it will

continue as a centre for retail, leisure and commercial uses. If it continues as a wedding venue after development, we question whether this would be acceptable in a residential location? The venue currently enjoys extensive music licensing hours due to its remote location. This would not be compatible with housing development in close proximity and puts the viability of the house as a commercial venture and employment site at risk.

27. Further, we draw attention to the fact that the Northbrook Park site contains a number of Grade 2 listed buildings including the main house. There is a policy presumption and legal requirement to "preserve and protect these heritage features". Of particular importance is the setting of the buildings and especially the impact on the historic parkland setting of the main house. The construction of large numbers of dwellings in such close proximity to these heritage assets will inevitably have a detrimental effect on their historical and rural parkland setting.
28. The draft local plan special policy talks about the desirability of an "integrated accessible transport system with walking, cycling and public transport". In order to be satisfied this could be achieved we would want to see more details of access to the footpaths to the south of the site via the A31 dual carriageway. We note that the proposal of a new cycle path only extends east towards Farnham. There are no proposed footpaths or cycle links to the village of Bentley which increases its isolation from the village.
29. We would want to see evidence that residents at Northbrook Park would not be reliant on offsite facilities, for example, affordable shopping in Farnham or other nearby towns. We are concerned that this could lead to a higher number of cars per household than better connected communities. We would require evidence that sufficient parking is available to meet the needs of this community.

Binsted Parish Council response

[REDACTED] <clerk@binstedparishcouncil.org.uk>

Tue 15/10/2019 14:53

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (1 MB)

Local Plan response October 2019.docx;

Please see attached Binsted Parish Council's response to the Draft Local Plan

Regards,



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Clerk, Binsted Parish Council

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Your Local Plan 2036

Response to EHDC Plan Large Development Sites in East Hampshire Consultation

Binsted Parish Council have reviewed in detail the proposed major site proposals but have concentrated on those that we feel have most impact on our Parish.

However, as a general comment we favour those that provide a sustainable future for population growth in the county. This means that those sites should be chosen that increase the sustainability of existing population centers rather than creating new ones. E.g. build at or close to villages or towns (Bordon, Alton, Four Marks where there are already sustainable areas that exist or can be improved) and not create new ones which merely achieve a numeric goal but decrease overall sustainability (e.g. Northbrook)

Many small villages are like Binsted and arguably below this sustainability threshold and the large site drive. This leads to poor decision making about villages unsustainability e.g. pub closure in Binsted and Bucks Horn Oak.

Binsted itself is under the umbrella of the South Downs National Park (SDNP) but some of the Parish is outside. However, all our Parish are both directly and indirectly affected by the proposals. The two sites which affect Binsted Parish most are Neatham Down and Northbrook.

1. Neatham Down

Neatham Down is in Binsted Parish and we have been interested to see how the proposal would unfold. Binsted is a large diverse Parish that encompasses more than the village itself. A large new village on the Parish perimeter would provide a difficult challenge to the balance of the Parish structure. In reality it would be a suburb of Alton so we really only view it in these terms. We can see how to many this would appear a logical natural extension of the town which is not too far and could rely on the towns resource.

1.1 Threat to Countryside

However, the overspill of the town to the south of the A31 does mark a substantial significant adverse impact on the landscape. In our view it should be the only adopted if other better options are not deemed to be viable. To this extent the larger development of Chawton Park at the other side of Alton would be a much less imposing change to the environmental amenity as it is visually enclosed within the valley. Currently Alton is entered from the countryside via Montecchio Way and is not too visible from the A31.

We are concerned this development would open the floodgates for Alton to expand south beyond its natural topographic contours giving it a much greater adverse impact on the environment. The current



buffer to the national park would be lost. Light and noise pollution would create a great impact on the landscape which will damage the view from and into the SDNP.

1.2 Highways Issues

The proposals appear comprehensive, but the development is somewhat detached from the town separated by the physical and psychological barrier of the A31. This would mean that linkage to the town would mostly be achieved by vehicles which is not desirable. There is a bridge to the industrial estate which might be used by some but this is not easy walking distance of the town. Certainly, the pedestrian/cycle crossing on the A31 (picture shown in your literature) represents a huge cause for concern as inherently dangerous.

2. Northbrook

The Parish Council previously responded to the proposed development at Northbrook Park and indeed objected to its apparent preferred selection when by the councils own initial assessment it should have been bottom of the list of contenders. We see little reason to change our view and indeed the proposal is now worse in several respects. We restate these opinions and see other sites as much more suitable.

It is our belief that the proposed new settlement at Northbrook Park is in the wrong location for a major new settlement. In the EHDC ranking again this site is one of the least favourable sites and it is obvious that more sustainable locations should be considered to be preferable for this housing allocation. There are numerous disadvantages associated linked to this site namely.

Firstly, this location will draw potential householders from the East (in Surrey or London) but be of much lower appeal to Hampshire residents who are more likely to be priced out of the location. This will result in proportionally more car use for those households. Also, the burden of this development will more likely fall on Farnham so they are unlikely to favour it given the lack of tax contribution.

2.1 Flood Risk

All local residents know the land south of the A31 floods right up to the road. Indeed, the A31 dual carriage way itself has flooded on several occasions in the past decade and became completely impassable. Ground water runoff from the Northbrook estate is also part of the problem, and the current owner has not prevented this. Significantly there are permanent “temporary” road signs indicating the potential for flood on the road.

This flood issue is likely to become worse with the climate changes giving higher rainfall rates. It is essential that the flood plain is not interfered with as this is essential sacrificial capacity to protect Farnham from flooding



2.2 Threat to countryside

This proposal for the Northbrook site represents development in the open countryside and development of an isolated site (contra to NPF 170). This site forms part of the rural gateway to Hampshire and as such has important visual landscape value. This is an unspoiled area of open farmland with the River Wey valley bordering Alice Holt Forest (ancient woodlands, SINCA and of archaeological significance) and the SDNP (contra to NPPF 172). Additionally, the development would cause significant light and noise pollution to this dark and tranquil area which would compromise the SDNP "Dark Skies" policy. The NPPF describes ancient woodland as an irreplaceable asset and states that further "development resulting in the loss or deterioration of irreplaceable habitat should be refused unless there are wholly exceptional reasons".

The developer's vision is for an industrial development on the south side of the A31, which would be a blot on this special river valley landscape which includes a public footpath bounded by the river and the SDNP. This river valley is described by the Northern Wey Trust as follows: - "The finest ten miles in England", Arthur Young (travel writer, 1741 - 1820) The northern Wey rises in Hampshire close to the market town of Alton, runs north-eastwards through a landscape of considerable natural beauty and crosses the county border into Surrey to reach Farnham, the other town on this stretch of the river, ten miles from Alton.

Furthermore, the southern part of the site is both a flood zone and a flood plain, has archaeological remains, and is therefore not in any case suitable for development.

In short, this river floodplain and countryside south of the A31 should not be developed otherwise Farnham will appear to expand westwards.

If development were to proceed it should be confined to the area North of the A31 but then this leads to the other concerns.

2.3 Not sustainable in the short/medium term

The proposed development also raises concerns of sustainability and deliverability as it is highly dependent on private vehicle transportation. The developer promises an infrastructure but at 800 houses this would likely lag behind any house building. In the short to medium term, the impact on local infrastructure such as the surrounding village schools, doctor's surgeries and provision of leisure activities etc. would be catastrophic. Local health and educational services are stretched as there are no junior school places available in the village schools and secondary school places in Farnham and Alton are oversubscribed or under pressure.

Far from being a sustainable infrastructure the development would be a drain on the surrounding neighbourhood much of which is in the adjoining county who it would appear have rejected the idea.

2.4 Artificial SANG



We are concerned that the proposal is a recipe for destruction of the natural habitat of the woodland and countryside are at risk of pollution from the increased human population. The proposal now includes a large SANG adjacent to the river purporting to be an improvement for wildlife biodiversity. It is a bizarre claim that says the natural environment can be improved with a club house, pathways and picnic areas. It is more likely this would potentially become a popular human playground driving away wildlife that has more right to be there. The river here is fragile and natural, and wildlife are quite capable of living on it without human interference. For example, locals know this river is populated by roving white egrets who being shy birds would likely be driven away.

2.5 Transport (Major Concerns)

The main adverse effect on Binsted Parish however is the transportation and infrastructure repercussions. This is already increasingly under strain following the traffic growth associated with not least the Bordon ecotown regeneration project. The A325 at Wrecclesham and where it joins the A31 at Coxbridge roundabout are already commuting bottle necks. The growing traffic volumes mean that main roads become congested creating back up into side roads and rural roads being used as high speed short cuts. As Bordon and Alton grow this situation will get worse without Northbrook. Waverley have plans to grow at this west end of Farnham feeding this Coxbridge roundabout. There are no plans to address this, and indeed it should be pointed out that the road capacity is also limited by the A31 Farnham bypass constraints.

Bentley Station is in our Parish and this is operating at capacity limits with the car park full by 7am. This is due to both growth from Bordon and London commuters migrating from Farnham to Bentley to secure a seat. The single-track line means the railway is at maximum capacity. Therefore, we share our neighbouring Parishes concerns about this massive overdevelopment of a fine heritage listed country estate which should be protecting the delicate countryside of which it is a custodian.

We will In-due course be objecting to the plans in the strongest terms to ensure this rural landscape and specifically the river Wey Valley is not lost to urbanized development which will infill.

Conclusion

It is extremely disappointing that the Local Plan repeats the same failures to consider wildlife when planning housing, transport and business development as were severely criticised in 2008 by the government's environmental watchdog (the Environmental Audit Committee): and that the Plan falls so far short of the ambitions of the government's current environmental policy (<https://www.gov.uk/government/publications/25-year-environment-plan>), which sets out the intention to leave the environment "in a better state than we found it", using the restoration of England's vital



habitats (such as woodlands and wetlands) to generate returns on investment at least as great as those from investment in traditional engineered infrastructure.

Binsted Parish Council is concerned that the focus on major development sites will detract from looking at real sustainability concerns of small rural villages.

Binsted Parish Council
October 15th 2019

Incorrect and misleading information in Large Development Site Information Pack

vicechair@bramshottandliphookndp.uk

Mon 09/09/2019 21:16

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: Admin <admin@bramshottandliphookndp.uk>; [REDACTED]@bramshottandliphook-pc.gov.uk>;

Potts, Victoria <Victoria.Potts@easthants.gov.uk>

Good evening,

On behalf of the Bramshott & Liphook NDP, I write to express major concerns over the misleading information set out by the developers/promoters of the 'Land South East of Liphook' in their submitted documentation for your Large Development Sites Consultation.

These concerns were initially raised by the members of the Steering Group that attended the Consultation event on 2nd September, and their discussions with the promoters during the event who implied that the NDP were positively working with and having meetings with them.

In particular concerns focus on the misleading information and implied working relationships set out in the Large Development Site Information Pack on pages 5, 22 and 23.

This information pack, and how the promoters discussed their proposals with my colleagues, implies that this consortium have established a positive working relationship with the Bramshott & Liphook NDP and had meetings with us as a group separate to the consultation events that we have held.

In addition they have stated the wrong date for our issued Interim Report.

We make it absolutely clear that the Bramshott and Liphook Neighbourhood Development Plan have not held any separate meetings with any of the original promoters or the current consortium members of this proposed large development site.

The only discussions had with these promoters, as with all the other site promoters within our parish, is acknowledging receipt of their submitted documentation to us by email, and conversations during the Design Forum held in November 2017, during which all developers who submitted information for this event had equal opportunities to present to us, and the public, their proposals and to take part in a masterplanning and discussion session that took place during this 3 day event.

The Bramshott & Liphook NDP, and the Steering Group, have not engaged separately with this consortium nor have we provided them with formal consultation feedback on their proposals.

Please confirm that this incorrect and misleading information will be

rectified immediately both online and in the event presentations so that members of the public reading the consultation documentation are not misled, and do not obtain the wrong impression of our NDP.

Kind regards,



Acting Chair of the Bramshott & Liphook Neighbourhood Development Plan

Consultation response to EHDC Large Development Sites consultation - Bramshott & Liphook NDP

vicechair@bramshottandliphookndp.uk

Tue 15/10/2019 23:56

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: Admin <admin@bramshottandliphookndp.uk>

 4 attachments (5 MB)

NDP_2019-03-19 - Response to EHDC consult.pdf; Liphook Phase II Transport Feasibility Study Report (Final).pdf; B&LNDP_2019-09-19 - Liphook Conservation Area Consultation Response.pdf; B&LNDP_2019-10-14 - EHDC Large Development Sites Response.pdf;

Good evening,

Please find attached the consultation response from the Bramshott & Liphook NDP to the Large Development Sites Consultation.

Please confirm receipt.

Kind regards,



Acting Chair of the Bramshott & Liphook NDP



BRAMSHOTT & LIPHOOK NEIGHBOURHOOD DEVELOPMENT PLAN

admin@bramshottandliphookndp.uk

Bramshott & Liphook NDP Office
The LMC Office
2 Ontario Way
Liphook
Hampshire
GU30 7LD

RESPONSE TO EHDC's DRAFT LOCAL PLAN REGULATION 18 CONSULTATION

Submitted by: Bramshott & Liphook Neighbourhood Development Plan
Date: 19th March 2019
Ref: BLNDP/EHDC-DLP/V.1

INTRODUCTION

The Bramshott and Liphook Neighbourhood Development Plan (BLNDP) have assessed the East Hampshire District Council's Draft Local Plan (EHDC DLP), its proposed planning policies and its proposed strategic site allocations for the Parish of Bramshott and Liphook.

The BLNDP has undertaken 3 public community events over the last 21 months: Visioning Event in July 2017, 3 day Design Forum in November 2017 and the recent NDP Public Consultation in February 2019, which included a 2 day presentation and 2 week online consultation period.

The evidence we have collected from all three events, that has been cumulatively emphasised through each sequential event, demonstrates that the community of Bramshott and Liphook Parish require any future developments within the Parish provide most importantly community benefits such as more recreation and open space (documented deficiency of open and recreation space within the Parish), improved infrastructure, mitigation measures to improve the traffic congestion and air quality in the conservation area of The Square in Liphook, the improvement of sustainable alternative modes of transport as the transport method of choice, better access to open countryside, protecting and developing our access to the South Downs National Park (see BLNDP Interim Report March 2018). There is also a demand for smaller business units of 50sqm or less, which is a much smaller size than the current larger sites which have been released or allocated for development within the district. The community also requires suitable affordable

housing in order to allow the diverse members of our community the opportunity to remain living in the Parish.

The community's visions for their Parish are outlined in our Neighbourhood Development Plan Policy Themes, as set out below. These visions are formulated from the evidence gathered at the Visioning Event and the Design Forum from the community.

- Housing Policy Theme's vision:
 - o 'Ensure new housing developments contributes to the identified local housing needs of the Parish, whilst having regard to affordability, design and sustainability. Any new development must respect our local environment, natural and built, and have a positive impact on the Parish';
- Access & Movement Policy Theme's vision:
 - o 'Improving the circulation of people and goods, around and through the Parish';
- Community Policy Theme's vision:
 - o 'To support an economically vibrant, mixed use centre, and to provide facilities for all generations including those living and working in the Parish';
- Sports and Recreation Policy Theme's vision:
 - o 'Improvement of existing facilities and planning for the future servicing of additional sports and recreation facilities for the community';
- Public Services Policy Theme's vision:
 - o 'To endeavour to provide better access to community healthcare, education and to ensure high standards of environmental sustainability throughout the Parish';
- Employment Policy Theme's vision:
 - o 'Support and promote a vibrant employment base within the Parish. Safeguard existing employment land and identifying new sites and opportunities, along with small business creation, and promote stronger education/ workplace links';
- Heritage and Design Policy Theme's vision:
 - o 'To rediscover the heritage of the Parish and address issues of aesthetics, in geographical areas such as the village centre and with regard to design';

The BLNDP comments that it is important that the visions and impact of any potential development on the community and the Parish is fully considered with any strategic site put forward. Evidence gathered at the Visioning Event July 2017, Design Forum Nov 2017 and NDP Consultation Feb 2019 demonstrates that the community is concerned on lack of infrastructure to facilitate the Parish as existing, and that any development has to have appropriate infrastructure and facilities in place before it could be considered appropriate.

It is important to note that the BLNDP is not anti-development. The BLNDP understands that places grow or decline but nothing stays the same, but it is important that development is located in the correct places to have a positive impact on place and community, both physically and psychologically, and development should not have a negative impact.

Badly placed development without the necessary infrastructure and facilities is likely to lead to an overstressed and fractured community. Bramshott and Liphook is not a commuter settlement, it is a community and this should be respected and nurtured.

The BLNDP note that the community has a wide range of views on development in the Parish. A NDP is about ensuring that any development, of all types, is assessed for present and future

needs, and any development that needs to take place is located appropriately for the community as a whole.

The below proposals are what is considered by the BLNDP to likely work better in terms of a spatial strategy for our Parish based on the initial evidence to date. Our preferences set out below has been informed by the community responses to date which have been gathered through various consultation events, and are considered to be a summary of the most frequent responses and comments raised by the community in order to be a factual response.

It is commented that the BL NDP have not yet carried out the due processes required for the screening option, Call for Sites, Strategic Environmental Assessment etc, and that the next steps in the process has to occur and run in full before any final decisions can be taken.

RESPONSE TO INDIVIDUAL PLANNING POLICIES AND STRATEGIC SITES

EHDC DLP Policy SA2, the allocation of the Chiltley Farm (LIP-017) site for approximately 100 homes:

1. The proposals for the Chiltley Farm (LIP-017) site provides only houses, Use Class C3. There are no community benefits proposed apart from affordable housing and CIL contributions. The site is small and not well located to provide additional facilities and the current proposals do not even offer onsite shared open spaces for new residents, which is out of keeping with the adjacent Special Character Housing Area. There does not appear to be any other benefits of developing the site that addresses the vision of the community, apart from the potential for some affordable housing.
2. The allocation of this site would be against EHDC DLP Policy S4, Health and wellbeing, and in particular Policy DM1, Provision and Enhancement of open space, sport and recreation.
 - a. Policy S4 states that development proposals should take into account and support positive health and wellbeing outcomes by ‘a) contributing to a high quality, attractive and safe public realm to encourage social interaction and facilitate movement on foot and cycle; b) .. the right mix of homes to meet people’s needs and in the right location; ... f) ensuring high levels of residential amenity; g) providing opportunities for formal and informal physical activity, recreation and play...’. It states to implement the policy that development can support health lifestyles by providing quality open spaces, particularly in areas identified as being deficient, for sport, recreation and play whilst improving links to existing spaces and sports facilities.
 - b. Policy DM1.1 states that ‘new residential development will be required to provide new or enhanced provision of useable public open space, sports and recreation facilities’; DM1.2 ‘as first preference, be provided on-site in a suitable location’;
3. Due to its location, and distance from all facilities, it will be likely be a private car dominated development and will undoubtedly add additional peak time traffic to the village centre. Conclusions of the EHDC/Hampshire County Council/Atkins Liphook Phase 2 Transport Feasibility Study state that the peak time traffic congestion is primarily local traffic moving from the East of the village to the West in the morning and vice-versa in

the afternoon. This proposed development of 100 homes, on the eastern outskirts of the village, and Parish, is considered to have a likely serious impact on the local road system, as it corresponds with the traffic movements highlighted in the Atkins Report, and is against the NPPF February 2019 Paragraphs 109 and 110. The proposal also makes no mention of improvements to local infrastructure and would be against EHDC DLP Policy S29, Infrastructure.

4. The proposal for approximately 100 homes is considered overdevelopment of the site due to its situation adjacent to an existing house site which is classed as a “Low Density Neighbourhood” in the EDHC DLP. The threshold in the EHDC DLP as set out in Policy DM30, Residential design in low-density neighbourhoods, is 15 homes per hectare, and the existing adjacent development has an approximate density of 8 homes per hectare. The proposals for the 4.66 hectare site works out at over 21 homes per hectare. The proposal should be seen as an extension to the existing development of Special Character. This is due to proximity to the adjacent housing development, views from and into the SDNP across this area, and because the proposed development uses the existing roads for access. It should therefore have a similar scale, layout, design and density, which would equate to approximately 40 homes on the site at 8 homes per hectare x 4.66 = 37.28.
 - a. The proposals would go against EHDC DLP Policy S29 and in particular Policy DM30 and Policy DM5, Amenity.
 - i. Should the EHDC be minded to reduce the density of development on this site and that this will only occur if the BLNDP finds other sites for the shortfall, the BLNDP are open to discuss the formation of a Memorandum of Understanding (MoU) that sets out that the density of this strategic site will be reduced and that the BLNDP allocates other sites for the remaining housing numbers. This MoU should also set out absolute clarity that if the density of this site increases from the agreed reduction during the process of the EHDC DLP, that the shortfall is adjusted accordingly so that the total proposed number of houses allocated to the Parish remains the same.
 - b. The Appeal Inspector for the Appeal of the decision made to planning application 22789/006, Appeal Decision APP/M1710/W/15/3129981 stated that *‘The scheme would thus deliver benefits, the most important of which would be the affordable housing. However, on the other side of the equation is the conflict with the development plan. The appeal proposal would be on a greenfield site within the countryside and outside the settlement boundary of Liphook. It would be contrary to Policy H14 in the LP and Policy CP19 in the JCS in this respect. Although the actual harm that would ensue would be relatively small, there would nonetheless be some adverse visual and landscape impact on the rural area. Furthermore, even though I do not believe that there would be direct conflict with Policy CP2, the proposal would not accord with the spatial strategy for housing in Policy CP10. The site is not allocated for development at Liphook in the very recently adopted Allocations Plan and would not comply with any of the other provisions concerning where housing should be located in order to achieve a sustainable pattern of housing development through a plan-led approach. In view of my conclusions on housing land supply, the housing policies are up-to-date and the conflict with them is a matter of very substantial weight. Bearing all those points in mind, I do not consider that the economic, social and environmental gains,*

when considered together, would be sufficient to achieve a sustainable form of development..... One of the core planning principles in Paragraph 17 of the Framework is that planning should genuinely be plan-led so that local people are empowered to shape their surroundings through a system of local and neighbourhood plans. For the reasons I have given the material considerations are not of sufficient weight to indicate that a decision should be made other than in accordance with the development plan in this case and the appeal does not succeed.'

5. The community have grave concerns that should this site stay allocated in the EHDC DLP, especially with this level of development, that it will set a precedence of development in the adjacent open fields to the East of the village, in particular the proposals put forward by Highfield School. Should this site stay allocated, and without appropriate planning policy restrictions, the community are concerns that there will be no defence in refusing individual site housing applications in this area and the subsequent piecemeal development of individual sites up to the boundary with the SDNP. This would result in no improvements in local infrastructure with main accesses being through Chiltley Farm site or the adjacent Highfield Lane, which is within the SDNP and therefore difficult to address as part of any planning applications made for land within EHDC. The cumulative effect of the increase in traffic will have a serious negative impact on existing residents and the wider road and village infrastructure.
 - a. This would be in conflict with the observations contained in the EHDC DLP Sustainability Assessments of these sites and the NPPF Paragraph 109.
6. The Chiltley Farm site is agricultural land and is occupied by an active working Poultry Farm producing broiler chickens. The loss of this food producing farm would be against EHDC DLP Core Objective B, criterion 8 and Policy S28 in protecting agricultural food producing land.
7. The allocation of the Chiltley Farm (LIP-017) site contradicts the EHDC Sustainable Assessment Report, which states:

“Other sites are still within 5km of the SPA. The ability to provide accessible SANG is therefore an important consideration. LIP-017, LIP019, LIP-020, LIP-023, LIP-022, LIP-011, LIP-015, LIP-021”.

“Sites to the southeast of Liphook form part of the setting of the SDNP, but there is varying levels of tree cover that could provide some context for development. There is potentially more capacity for development adjoining the settlement, but perhaps less so in areas further east and south of the railway line. Liphook is an important entry to the national park and the National Park Authority has no proposals to allocate land for development in its adjoining areas. LIP-017, LIP-019, LIP-020, LIP-023, LIP-022, LIP-021”

“Constraints in the southeast include potential noise impacts (the railway line), flood risks from groundwater sources, the rural character and the capacity of local roads (Devil’s Lane and Highfield Lane). LIP-017, LIP-019, LIP-020, LIP-023, LIP-022, LIP-021”
8. LIP-017 should be included in the Sustainability Assessment comment: *“The potential impacts from development on the transport (road) network in the centre of Liphook are likely to be such that there is limited capacity for additional residential development. LIP-019, LIP-020, LIP-023, LIP-022, LIP-011, LIP-015, LIP-021”*, due to the fact it is adjacent and part of the same area, any development of the site will have the same impact on the road network.

9. Should Chiltley Farm (LIP-017) site be developed land needs to be reserved on the site for a future pedestrian/cycle bridge over the railway line as part of infrastructure improvements should additional development take place in the area, as it's the only point where access is available on both sides of the railway. It is noted that this will also limit the available land for development of housing and therefore affect the number of dwellings that can be provided. Preferably a pedestrian/cycle bridge over the railway line should form part of the proposals for this site, as part of any development.
10. The site borders the Chiltley Lane SINCC which appears to have not been given sufficient weight in the decision to allocation of the strategic site.
11. Evidence received during the NDP public consultations sets out that adjacent properties both in The Berg and the North side of the railway have concerns that Chiltley Farm currently suffers from surface water flooding, and significant mitigation will be needed to address this flooding issue as part of any proposals, without diverting surface water into adjacent developments, or affect the railway line.

Taking into account the reservations we hold on the strategic allocation of the Chiltley Farm site the BLNDP feel a much better site allocation would be replacing the Chiltley Farm site with the Penally Farm site at Hewshott Lane (LIP-014). The Penally Farm site better reflects the wishes of our community and better conforms to policies within the EHDC DLP as set out below:

1. The Penally Farm proposals submitted as part of EHDC's Call for Sites indicate up to 175 homes (preferred option 1) an increase of 75% in the number of homes compared to Chiltley Farm with a density of 12 homes per hectare. This number of homes should help EHDC meets its housing target towards the end of the EHDLP period and also it would mean an increase of 30 affordable homes compared to the Chiltley Farm site.
2. Factual analysis of sites within the Parish, in particular distances as one physically walks/cycles or drives to existing facilities and services demonstrates that the Penally Farm site is better located within the village with immediate vehicular access to the A3 junction, and it is also closer to the Liphook Infants and Junior Schools as well as secondary schools, and two of the village Nurseries without needing to travel through The Square. Access to all local facilities are primarily easier, with wider pavements and less road crossing require, and the development is much less likely to be private car dependent and encourage residents to choose alternative modes of transport as a result. This would be in accordance with NPPF Paragraph 109 and with far less increase in the peak time traffic in The Square.
3. The proposals include 40% Green Infrastructure and the developer has stated in their submission that they would be open to providing a new recreation space, suitable for a football pitch as well as other uses. This much needed space could be used by Liphook United Football Club which would then release the War Memorial Recreation Ground in the centre of the village to be available for other community recreation and sports use. This would be in accordance with EHDLP Policy S4 and DM1 and go some way to reduce the documented deficit of open and recreational space within the Parish.
4. Access to the Penally Farm would be onto the already improved section of Hewshott Lane and its junction with London Road. The developer has stated in their submission that they would be willing to construct the main access road on the site to a standard, design and route that would it mean it could be used in the future as the Mitigation Route Option 3 as outlined in the Liphook Phase 2 Transport Feasibility Study. This would mean 50% of the road would be constructed by the developer. To ensure site traffic did not use the narrow

section of Hewshott Lane suitable traffic restriction measures could be put in place, with access points only onto the wider section of Hewshott Lane. This section of new road would then be available for any future development in the east of Liphook (consortium proposals to also include LIP-017 Chiltley Farm) as part of the infrastructure improvements that would be required should sites to the East of Liphook centre come forward.

5. The proposal for the Penally Farm site includes direct access to Radford Park from the development as well as 40% onsite green infrastructure. Access to Radford Park connecting with the new facilities provided at Penally Farm could be provided for all residents of the Parish as well as a proposal to upgrade pathways within Radford Park to hard surface and low level lighting where appropriate and deemed necessary. This would be a benefit to all residents of the Parish and also provide a partial traffic free route for residents of the development to access facilities in the village centre. This would be in accordance with EHDLP Policy S4, S29 and DM1.
6. The current use of the buildings on site are mixed with some used for light industrial, and one lawful house. The developer has stated “sensitive development” of this area but we propose that the area could be used for a mixed small business (max unit size 50sqm) and/or live-work units. This area would have access from the main development road and not Hewshott Lane, removing all current traffic from this site from that section of the Lane, and would provide much needed small business units with ease of access from the main road, the A3, in accordance with EHDLP Policy S13 and in particular S13.6.
7. Although a portion of the site is within the 400m buffer of the Wealden Heaths Phase II SPA this does not preclude the development of Business, Open Space or Recreation in this buffer zone with the development of housing outside the 400m buffer. The SPA that is being protected by the 400m buffer is, in fact, on the other side of the A3 Trunk Road so any domestic animal would need to cross 8 traffic lanes (Hewshott Lane, Southbound Off Slip Road, Southbound Dual Carriageway, Northbound Dual Carriageway, Northbound On Slip Road) before walking 100m to access this area of the SPA alongside the A3. The site is adjacent to the River Wey Conservation area but the topography of the site, in relation to the Conservation Area, would mean minimal visibility, intrusion and detrimental effect on the Conservation Area. Mitigation measures (addition of an undeveloped buffer within the site adjacent to the conservation area) would easily overcome any environmental concerns there may be. The proposed development would be adjacent to the Bramshott Place development (included in the EHDLP as an extension the Settlement Policy Boundary) which sets a precedent for development in the area and with mitigation measures (addition of an undeveloped buffer within the site adjacent to the conservation area) would easily overcome any environmental concerns.

8. Chiltley Farm – Penally Farm distance comparison

<u>Destination</u>	<u>Chiltley Farm</u>	<u>Penally Farm</u>
Liphook Infants & Junior School	2.5 km	1.5 km
Bohunt School & Sixth Form	2.0 km	1.5 km
Liphook A3 Junction	2.9 km	0.6 km
Village Centre facilities	1.7 km	1.3 km

Sainsburys Store	1.5 km	1.5 km
CO-OP/Post Office	2.1 km	1.1 km
Railway Station	1.1 km	2.0 km
Bus Stop (No13 bus)	1.5 km	1.1 km
Radford Park	2.1 km	0.0 km (using new access from site)

All measurement taken from an online measuring tool using the most convenient/direct walking route on pavements from the entrance to proposed sites.

Please refer to the evidence packages included with the submission of this response for further details and evidence gathered by the NDP during the public engagement events.

EHDC DLP Allocation Policy SA3 Land West of Headley Road LIP-012 for 36-40 homes:

1. This site allocation is for 36-40 houses with no other land uses proposed on this site. Apart from the potential provision for affordable/starter homes housing and a small play area, and CIL contributions, there does not appear to be any other benefits of developing the site that addresses the vision of the community.
2. The NDP group are not averse to the development of this site as it relatively well located for the local schools, the NDP comments that 36-40 houses is high density compared to surrounding development, and that access onto Headley Road and the need to reduce the speed and volume of traffic on this road is of highest priority. Any proposals should include mitigation techniques to reduce the speed of traffic on this section of the road, and of importance ensure that vehicles, pedestrians and cyclists can enter and exit this site safely.

EHDC DLP Allocation Policy SA1 Lowsley Farm – Phase 2:

1. It is understood that this site is allocated for 175 houses with planning consent already in place, however, this particular planning consent can count towards the housing numbers required to be met by EHDC, of which it appears approximately 300 houses are expected to be proposed in B&L as a whole.
2. If there is any way of influencing this site allocation it is to enforce that the Sustainable Urban Drainages systems are installed correctly as there is evidence of surface water flooding in the Phase 1 development following the recent heavy rain.

EHDC DLP Allocation Policy SA4 Land adjacent to Church Road in Bramshott:

1. This site allocation is for infrastructure/community use only. It is acknowledged that Bramshott does not have many community facilities, however, it does have its own community as residents make the best out their hamlet and the facilities available, and have some unique social facilities as a result.

2. Whilst it is unlikely that the allocation for infrastructure/community use will be seen as a negative for this area, we wish to know further details on what type of uses EHDC propose the site could be used for.
3. Public consultation responses from the NDP events have raised that the main concerns for Bramshott is the speed of traffic that travels down Church Road and Church Lane and the lack of off road parking that leads to constant parking on street.
4. Any proposed community/infrastructure facility on this site will need to take consideration and address where possible the lack of parking facilities available in this area and the impact of the facility on car traffic to and through Bramshott. The NDP does wish to promote walking and cycling over use of the car, however the location of this site means it is likely that users from areas outside of the immediate hamlet and North-West of Liphook will travel by car.
5. A questionnaire was carried out by the Bramshott Bugle in 2018 that was via a Mailshot to all households of the hamlet of Bramshott; it is noted that some answers can be considered subjective, however, the relevant points from every response have been extracted and summarised against each question. The results are included as an appendix document to this submission. The responses highlight the residents' concerns on existing and potential increase in traffic, and that any community facility that is a physical building is an appreciated idea but likely financially unviable due to the size of the hamlet. The result of the questionnaire is that reduction of speed is of highest priority, and improvements to footpaths for safe access.

INFRASTRUCTURE

The Access and Movement Working Party's objective is to ensure continued access throughout the Parish with a reduction in the negative impacts associated with high traffic volumes and speeds. The research and evidence gathered to date sets out a particular challenge to address the existing congestion at the 3 mini-roundabouts at The Square, Liphook, and manage the flow of traffic from the 6 arterial roads which converge on The Square.

The Working Party evaluated the Atkins Liphook Transport Studies, Phase I, April 2016, and Phase II, July 2018, and quantified the results based on this known evidence base as part of their analysis of EHDC's draft Local Plan.

The Access and Movement Working Party raise the following comments: to develop a robust Highways/Transport plan for the NDP covering the term of the NDP we require from EHDC details of the assessed additional traffic that will come from the peripheral developments, from both those already granted planning consent and the proposed strategic sites, such as the Bordon town regeneration, the proposed growth of Lindford and other proposed and committed land allocations, in order for the Working Party to evaluate potential impact on this Parish and consider appropriate measures to mitigate the traffic flow, and speeds, and if additional commuter parking at Liphook Rail Station and the through traffic of those who may seek to use Haslemere station as an alternative, noting that these 2 rail stations are the closest to these peripheral developments. A consideration would also be whether the increase in commuters would warrant an additional stopping train service at Liphook.

Other parking for visitors to Liphook centre will also need to be accounted for developments using the services of this district service centre. It is the vision of the B&L NDP that our

community becomes less reliant on car transport, and the NDP is seeking ways of promoting the safe and connected use of active modes of transport across our Parish. There are concerns that additional parking spaces would encourage further car use.

It is understood that EHDC's process is that they have to wait until all the land allocations have been committed before a highways plan can be considered, which whilst considered to be rather backwards thinking, ie. make good a situation already proposed, it is understood that this is the process. The NDP intends to keep pace with the EHDC Local Plan, and therefore, we depend on the forthcoming traffic analysis as soon as possible. It is important that traffic analysis that is negative in result, proposing mitigation tactics to reduce the impact of traffic and promote the safe and connected use of active modes of transport as the method of choice for travel rather than encouraging further car use and the negative side effects that brings, including the increase in poor air quality on well used walk to school routes and routes to the rail station.

The NDP wish to make clear that the NDP team should not be the ones liable for undertaking expensive consultations and traffic analysis for both consented housing sites and proposed strategic sites in order to mitigate the potential vehicular impact of proposed and granted sites. The NDP considers that this should form a vital part of the analysis by the Local Planning Authority before the formal allocation of the strategic sites to ensure that allocations will not have an undue negative impact on surrounding areas. The NDP will be striving to address the community's aspirations for a safer, less polluted and less congested Parish, however, allocation of strategic sites that will require a higher number of vehicular movements through The Square to use facilities and in particular the rail network, will not assist with achieving the community's vision, and will only bring further negative impacts if not addressed appropriately.

CONCLUSION:

The land use analysis carried out by the NDP demonstrates that there are other sites in the Parish that are better located than Chiltley Farm LIP-017 (Policy SA2) that could accommodate mixed use developments and bring more benefits for the community of the Parish. Two of those sites are close to The Square, but located within the SDNP and could only come forward under exceptional circumstances. It is acknowledged that National Parks are considered not suitable places for unrestricted housing development. EHDC Policy S18: Landscape also recognises the setting of the South Downs National Park.

Sites have been analysed as being best located for access without relying on use of the private car and promotes sustainable development where the community utilises walking and cycling on a more regular basis. This is a key requirement of the NPPF which does not appear to have been followed through in the draft strategic site allocations for this Parish, as well as being a key vision of the community in the feedback to the NDP.

From the evidence base it is clear that mixed use development sites will be of most benefit to our community, and with reference to the NDP's land use analysis, the first large enough site that is not heavily constricted by environmental designations and constraints is land at Penally Farm LIP-014. The Penally Farm site could allow for a mixed use development of small light industrial/business units, housing, along with sports and recreation land/SANG to the North of the site within the 400m SPA buffer zone. Initial analysis from the NDP Consultation Feb 2019 suggests that the community supports the development of this site and that it could bring more benefits for the community, if the other sites nearer the top of the analysis list cannot be developed.

Comments also included that a buffer zone for natural conservation and protection of the River Wey Conservation Area is included to the immediate South of the site. However, it is key that any development of this site includes walking and cycling access via Radford Park, and a well located road linking the development within the site itself and potential to convert pedestrian access routes should planning policies or requirements change in the future.

The BLNDP are not promoting that the Parish is developed exponentially, but it understands that a certain level of development has to occur to achieve the facilities and infrastructure that the majority of the community of the Parish requires and has set out as their vision for the future. It is understood that some members of the community do not wish to see any further increase in development in the Parish, and that Liphook should stay as a village. The NDP have considered the comments from all parishioners and taken the most collective comments forward as the visions for the Parish.

The BLNDP have used the current evidence gathered to date from the community to initially conclude that the current preferred sites for future development within the Parish of Bramshott and Liphook are the Land to the West of Headley Road LIP-012 and Land at Penally Farm LIP-014 with Land adjacent to Billerica Church Road LIP-008 for community use and Lowsley Farm as an existing allocation.

The evidence the BLNDP has obtained from our recent community events show the need for any future development in the Parish to provide not only housing but also additional community facilities, infrastructure improvements and small business space and any development to not increase the issues the Parish has with peak time traffic in The Square. The inclusion of the Chiltley Farm LIP-017 site does not meet these requirements. The evidence gathered from the community sets out that this site should be removed from the site allocations and replaced with the Penally Farm site due to lack of suitable infrastructure and access to facilitate the development.

The cumulative conclusion of the evidence base to date is that if development has to happen, the right infrastructure, facilities and services have to be in place and improved as part of any proposals, not only to ensure these meet the current needs, but also the needs of the proposed development, whilst not negatively impacting the existing community of this Parish.

We believe that the above proposals are more responsive to the needs of this community, and we want to pursue the implementation of our preferred strategy through our neighbourhood plan, accepting that the due process for Call for Sites, Strategic Environmental Assessment and draft plan consultation etc. will all need to run its course in full before any final decisions can be taken.

In the meanwhile, we wish to have constructive dialogue with EHDC to see how our preferred approach backed by the evidence from the community and the needs of the EHDC Local Plan can fit together, especially with regard to site specific policies, including density ranges, and the distribution of overall housing numbers, so that there are benefits for not only the new potential residents but the existing community to appropriately nurture and support the community of Bramshott & Liphook.

Yours Sincerely,

The Steering Group of the Bramshott & Liphook Neighbourhood Development Plan

ATTACHMENTS TO THIS LETTER:

- 8 x evidence base documents – 7 x 1 per Policy Theme + 1 overall land use analysis;
- 1 x Bramshott Questionnaire summary
- 7 x initial feedback analysis from NDP Public Consultation, one per Policy Theme

APPENDIX A:



Figure 1: Photograph of flooding at the Chiltley Farm site.

Liphook Phase II Transport Feasibility Study

Transport Feasibility Study

Hampshire County Council

July 2018

Notice

This document and its contents have been prepared and are intended solely as information for Hampshire County Council and use in relation to Liphook Phase II Transport Feasibility Study.

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Executive Summary

Atkins have been instructed by Hampshire County Council (HCC) to undertake a 'Phase II Transport Feasibility Study' on behalf of East Hampshire District Council (EHDC). The Phase II study is required to better understand the current traffic flows through Liphook, focusing on the double mini-roundabouts at The Square, and to use these flows to carry out an initial assessment of the viability of the strategic mitigation options identified in the Phase I study. The study also identifies the perceived issue of traffic travelling through the village to / from the A3 to Haslemere (which is locally thought to contribute to current congestion issues).

The study concluded that a significant proportion of traffic travelling through the double mini-roundabouts is not strategic traffic, therefore a revised signage strategy is not warranted.

The high-level analysis of the strategic mitigation options suggests that Strategic Mitigation Options 1, 2 or 3 (which all provide a road link from Haslemere Road to London Road) could provide the most relief to the double mini-roundabouts but, could result in a reassignment of traffic along inappropriate local roads. These options were also identified in the Phase I study to have significant constraints in that they are currently aligned through the 'Memorial Recreation Ground' and 'Radford Park'. This is also applicable to Option 5 ('The Northcott Trust' Western Ring Road), which also has the constraint of being aligned through the SDNP and is estimated to be a very expensive option (due to the length and nature of the SDNP i.e. waterways etc.). Option 4 (The Lowsley Farm Link Road) is deemed not to be a viable option, providing the lowest relief to the double mini-roundabouts, including the constraint of being aligned through an area of SANG.

Therefore, it is recommended that further assessment is undertaken on the double mini-roundabouts at The Square (including the pedestrian crossing) to understand the potential relief that can be attributable to removing traffic from the network from the implementation of sustainable transport options / initiatives (i.e. school / workplace travel planning promoting cycling / walking / public transport and discouraging driving).

This is based on the following findings from the traffic surveys:

- A high proportion of traffic travelling through Liphook at peak times (particularly at the double mini-roundabouts) is local traffic;
- Most vehicles dropping-off / picking-up school children access and exit the schools via Headley Road; and
- None of the strategic mitigation options proposed would accommodate the predominant movement recorded during the ANPR surveys for the AM and PM peak period (Headley Road to London Road and vice-versa).

1. Introduction

Atkins have been instructed by Hampshire County Council (HCC) to undertake a 'Phase II Transport Feasibility Study' on behalf of East Hampshire District Council (EHDC). The Phase II study is required to better understand the current traffic flows through Liphook, focusing on the double mini-roundabouts at The Square.

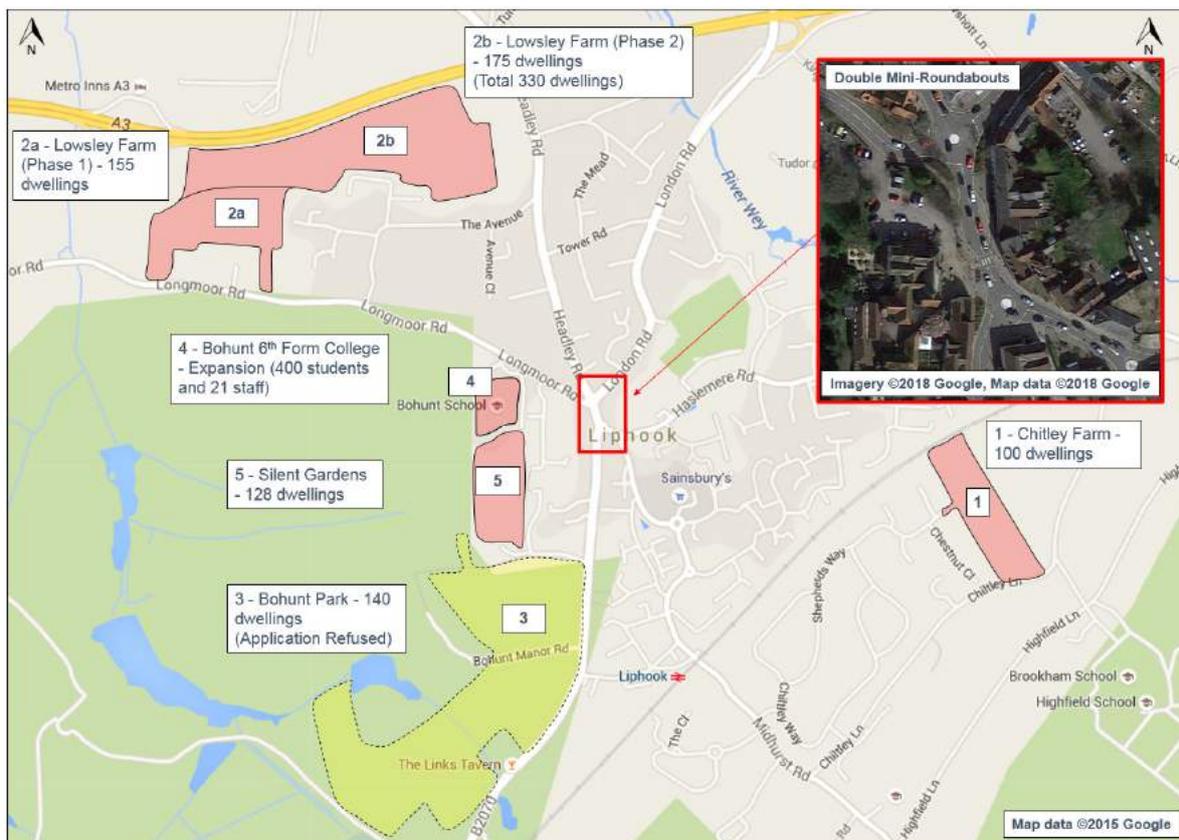
The study outlines the proportion of Liphook traffic that is considered local (i.e. with an origin or destination within Liphook) or external (i.e. non-local traffic passing through Liphook). This information is subsequently used to assess the viability of the strategic mitigation options identified in the Phase I study.

2. Background - Phase I Transport Feasibility Study (June 2016)

2.1. Introduction

Atkins were commissioned by HCC (on behalf of EHDC) to undertake a Transport Feasibility Study for Liphook. This study (which constitutes Phase 1) was undertaken in June 2016) considered the cumulative impact of developments proposed within Liphook; focusing on the double mini-roundabouts at The Square. The location of the double mini-roundabouts at The Square and the proposed developments (with associated proposals) is shown in **Figure 2-1**.

Figure 2-1 Liphook Phase I Study – Proposed Development



The cumulative trip generation forecast for the proposed developments in Liphook (as outlined in Figure 2-1) was as follows:

- AM Peak (0800-0900)
 - 118 inbound trips to the developments;
 - 246 outbound trips from the developments; and
 - 364 two-way (combined inbound and outbound) trips.
- PM Peak (1700-1800)
 - 198 inbound trips to the developments;
 - 114 outbound trips from the developments; and
 - 312 two-way trips.

The Phase I study concluded that the double mini-roundabouts (The Square) was currently experiencing capacity issues (in the Year 2016) and would further exceed capacity by 2021 with the developments in place. Subsequently, the following three improvement options to the double mini-roundabouts was investigated:

1. Minor modifications to the double mini-roundabouts;
2. Changing the double mini-roundabouts to priority junctions; and
3. Signalising the double mini-roundabouts.

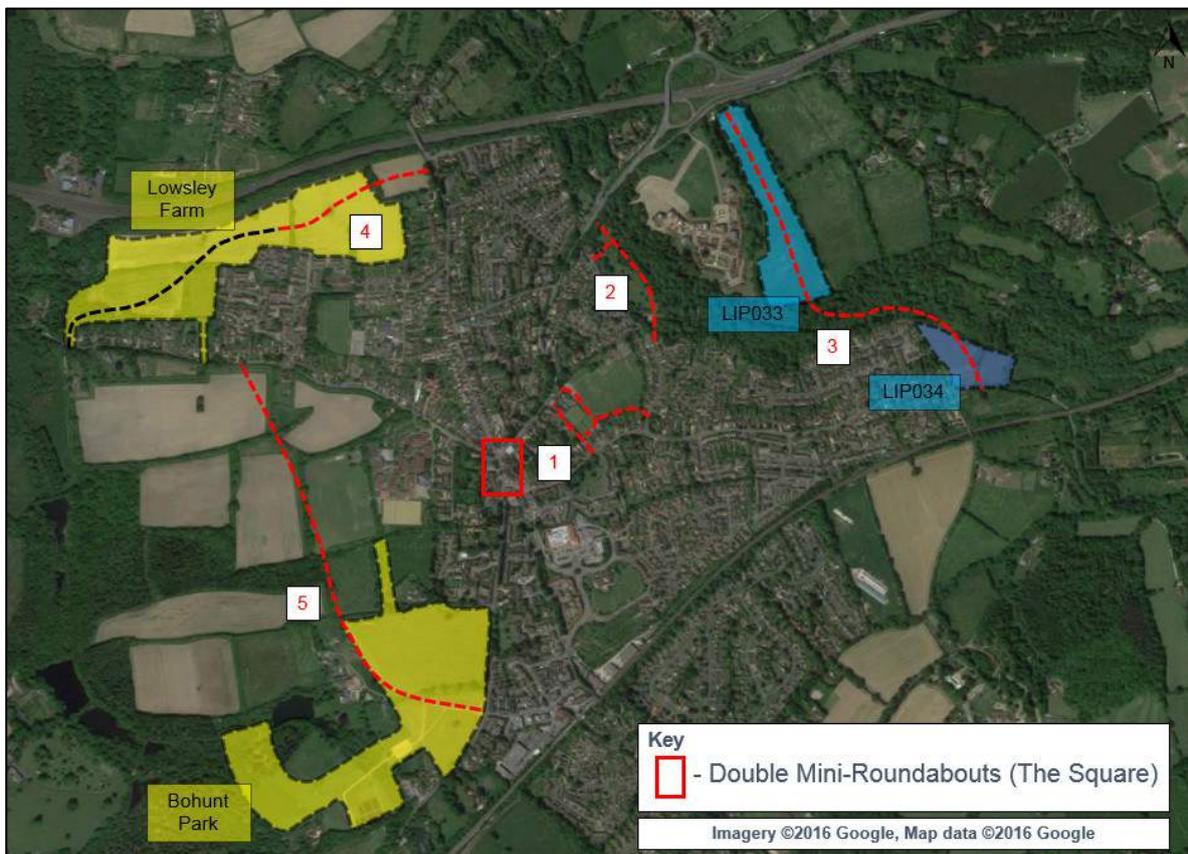
The analysis showed that at best, these options would provide minimal operational benefits and therefore were discarded.

Therefore, the study identified more strategic forms of mitigation; with the aim of reducing the volume of traffic travelling through the double mini-roundabouts at peak times. These five strategic mitigation options are explained in more detail below.

2.2. Strategic Mitigation Options

The five strategic options considered are shown in **Figure 2-2** with a detailed description outlined below.

Figure 2-2 Liphook Phase I Study – Five Strategic Mitigation Options



2.2.1. Option 1 – B2131 Haslemere Road to B2131 London Road Link

This option would involve construction of a new short road link through the recreational area directly to the east of the centre of Liphook.

2.2.2. Option 2 – Meadow Way or Malthouse Meadows to B2131 London Road Link

This option would involve construction of a new road link through Radford Park to connect B2131 London Road with either Meadow Way or Malthouse Meadows.

2.2.3. Option 3 – New Eastern Developments Link Road

This option would complement future housing allocations included in the ‘Strategic Housing Land Availability Assessment 2014’¹. It would involve constructing a new road link through housing allocation sites LIP033 (Land East of Bramshott Place) and LIP034 (Land East of Stonehouse Road and north of Haslemere Road) which would need to be connected via a new structure across the River Wey.

2.2.4. Option 4 – Lowsley Farm Link Road

This option consists of extending the Lowsley Farm access road to form a link with the B3004 Headley Road.

2.2.5. Option 5 – ‘The Northcott Trust’ Western Ring Road

This option would involve construction of a new road link through the South Downs Natural Park (SDNP).

¹ East Hampshire District Council. *Strategic Housing Land Availability Assessment 2014 Included & Excluded Sites – Liphook*. Available online: <http://www.easthants.gov.uk/sites/default/files/documents/LiphookSHLAA2014.pdf> [Accessed: 22/05/18]

3. Phase II Transport Feasibility Study (May 2018)

3.1. Introduction

The Phase II study is required to better understand the current traffic flows through Liphook, focusing on the double mini-roundabouts at The Square.

The study outlines the proportion of Liphook traffic that is considered local (i.e. with an origin or destination within Liphook) or external (i.e. non-local traffic passing through Liphook). This information is subsequently used to assess the viability of the strategic mitigation options identified in the Phase I study.

It also identifies the number of vehicles (local or external) that are associated with dropping-off or picking-up pupils from Liphook Infant and Junior School as well as Bohunt School.

If the study concludes that a significant proportion of traffic travelling through the double mini-roundabouts (The Square) is not local traffic then future assessments can focus on options for diverting this traffic to more appropriate existing alternative routes (e.g. new strategic signage strategy). Conversely, if the study concludes that a significant proportion of traffic travelling through the double mini-roundabouts is local traffic, then future assessments will focus on options for diverting this traffic away from the double mini-roundabouts (i.e. strategic mitigation options or sustainable transport options / initiatives). This study considers the viability of all options under consideration.

3.2. Methodology

A traffic survey programme was undertaken to determine current traffic flows travelling through Liphook (and the double mini-roundabouts).

3.2.1. Automatic Number Plate Recognition (ANPR) Camera Surveys

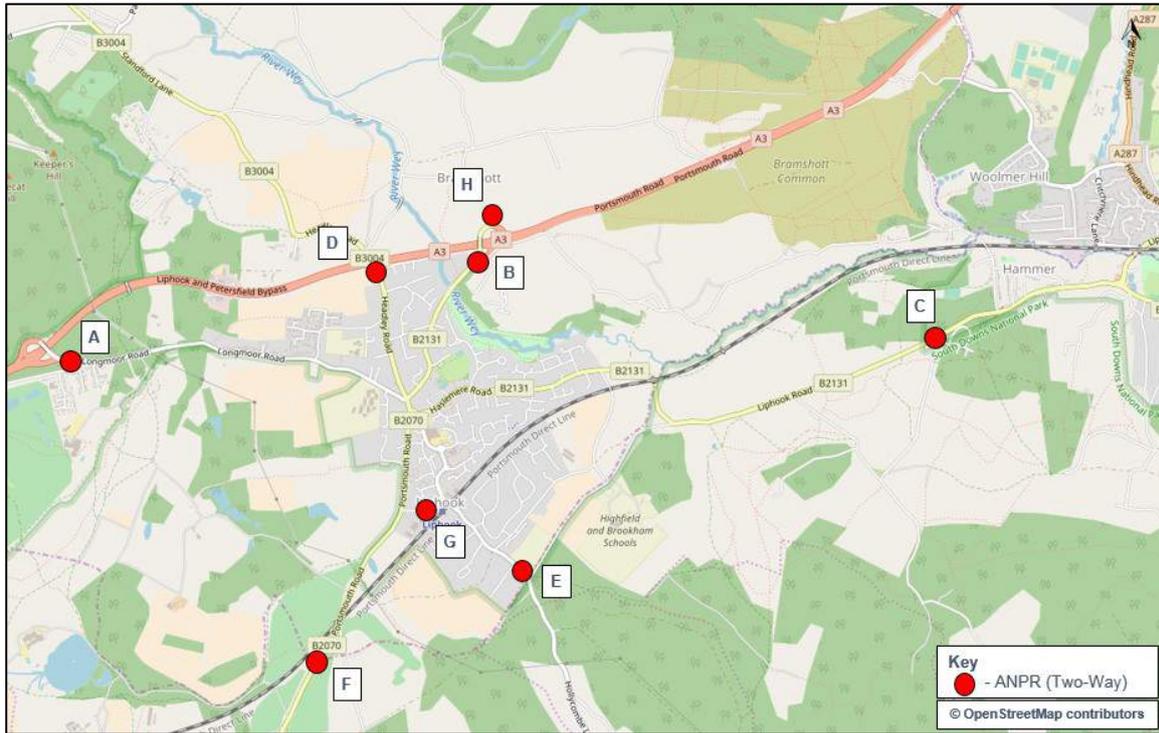
To determine the origin and destination of all traffic travelling through Liphook, a series of ANPR cameras were installed at various locations (as shown in **Figure 3-1**):

- A – Longmoor Road;
- B – London Road;
- C – Liphook Road;
- D – Headley Road;
- E – Midhurst Road;
- F – Portsmouth Road;
- G – Station Road; and
- H – Church Road.

ANPR survey cameras record vehicle number plates at specified locations by time and date. This enables construction of a vehicle movement and journey time matrix for a specified study area.

All the ANPR survey cameras (with the exception of ANPR location G which recorded traffic travelling along Station Road) recorded traffic entering and exiting the village.

Figure 3-1 ANPR Camera Locations



A number of survey methods (other than ANPR) are available to determine the origin and destination of vehicular traffic. The most suitable method (based on sample size, quality and cost) for this study was ANPR surveys. A breakdown of each option is shown in **Appendix A**.

The overall sample rate for the ANPR surveys was 86% (85% in the AM and 86% in the PM survey period).

Consequently, the results outlined in the following sections gives an accurate indication of the traffic movements within Liphook.

3.2.2. School Drop-Off / Pick-Up Manual Number Plate Surveys

To identify the number of vehicles undertaking school drop-off / pick-up as part of their journey, manual number plate surveys were undertaken on the roads in the vicinity of both Liphook Infant and Junior School and Bohunt School.

3.2.3. Junction Turning Counts

Junction Turning Counts were undertaken at the double mini-roundabouts at The Square and at the B2131 Haslemere Road / Midhurst Road mini-roundabout.

All three elements of the traffic survey programme were utilised to determine the proportion of Liphook traffic considered to be local or external.

Figure 3-2 Junction Turning Counts (The Square)



3.2.4. Survey Times

The traffic surveys were undertaken during the following times; covering both the network and school AM and PM peak periods:

- AM (0700-1000); and
- PM (1500-1900).

3.2.5. Survey Date

Originally the traffic surveys were scheduled to take place in November 2017, however due to roadworks in the area (with the potential of having a significant impact on traffic), the surveys were ultimately undertaken on Tuesday 5th December 2017.

Analysis of traffic flows on the A3 confirms that the survey data obtained is reflective of neutral traffic conditions within the study area.

4. Strategic Traffic and The Square

4.1. Introduction

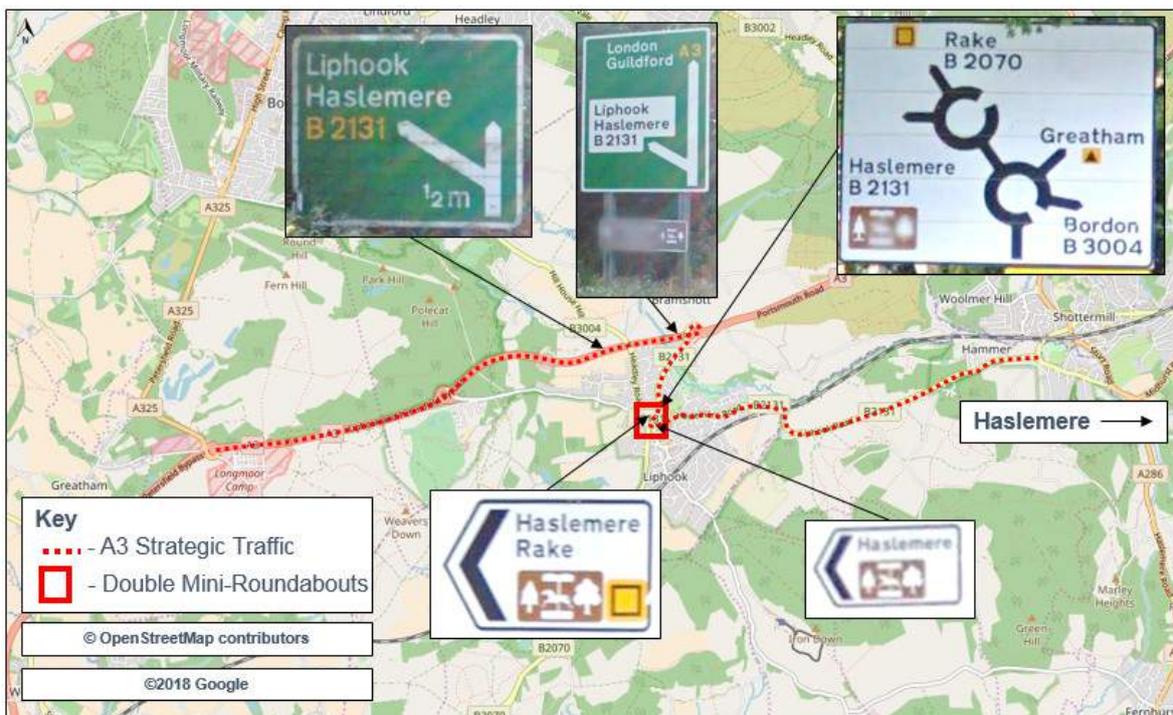
For the purpose of this study, strategic traffic is defined as external traffic travelling between Haslemere and the A3 via the double mini-roundabouts (The Square). Strategic traffic is perceived as being a significant albeit unnecessary contributor to peak period congestion at the double mini-roundabouts; with route planning software and signage on the A3 directing traffic through Liphook on route to / from Haslemere.

This chapter considers the impact of strategic traffic that was observed travelling through the Liphook double mini-roundabouts (The Square).

4.2. Signage

As shown in **Figure 4-1**, traffic travelling in an eastbound direction on the A3 is directed to Haslemere via the double mini-roundabouts in Liphook.

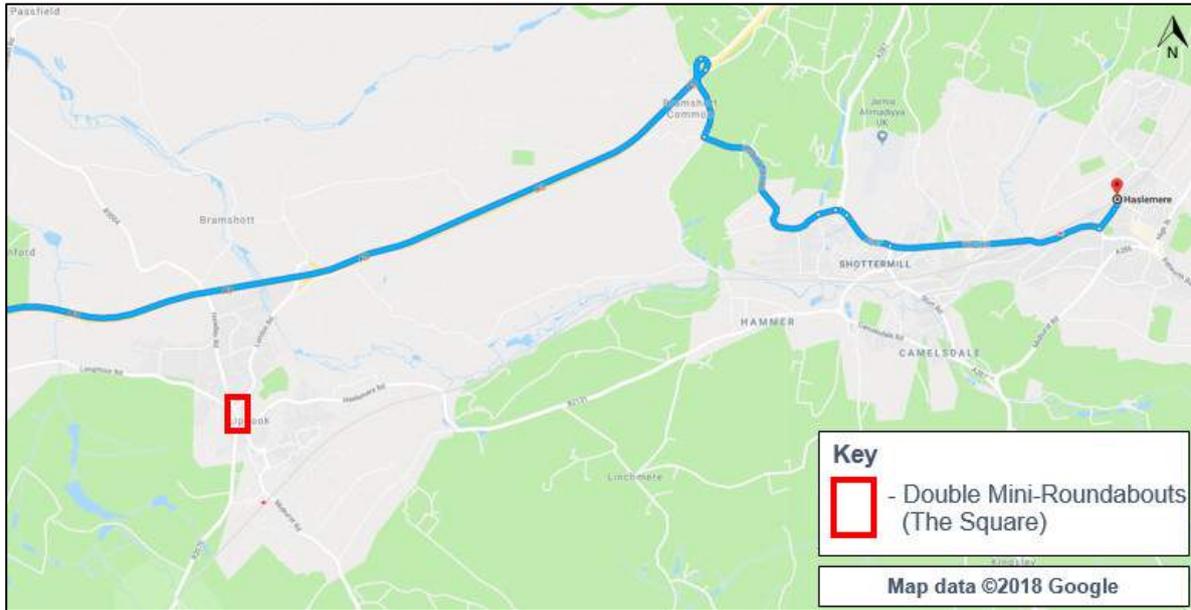
Figure 4-1 A3 (Eastbound) to Haslemere – Selected Signage Review



4.3. Route Planning

When using route planning software during weekday peak periods (i.e. google maps using the shortest travel time parameter), A3 traffic is directed to Haslemere via Bramshott Common (accessed off the A3 to the east of Liphook) and not via the double mini-roundabouts at The Square (as shown in **Figure 4-2**). This is a more appropriate route given the existing traffic problems in Liphook.

Figure 4-2 A3 (Eastbound) to Haslemere – Via Bramshott Common



Notwithstanding the above route planning advice, the distance (in miles) to Haslemere from locations to the north-west (e.g. Bordon) and south-west (e.g. Petersfield) is less when travelling via Liphook. Consequently, A3 travellers using route planning software using the shortest distance parameter would be directed through Liphook as per current signage.

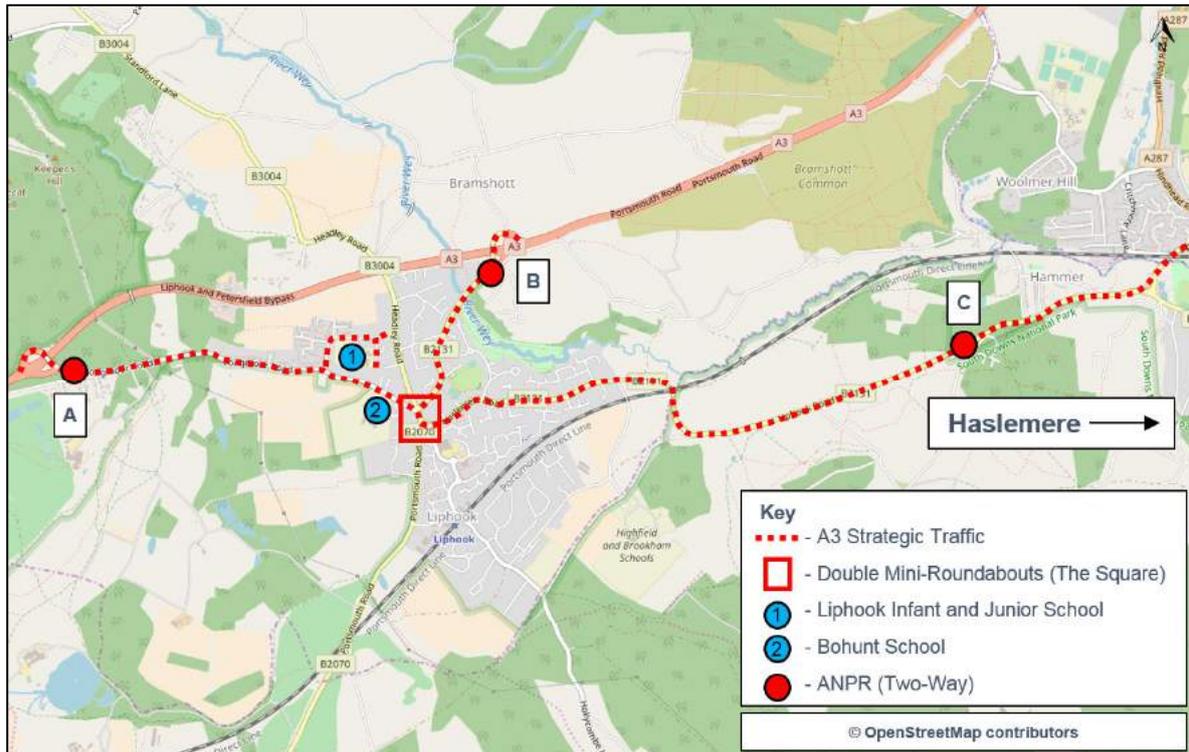
4.4. School Drop-Off / Pick-Up

This section also considers strategic traffic (as well as local traffic) that is travelling through Liphook to drop-off / pick-up school children at the following locations (as shown in **Figure 4-3**):

- Liphook Church of England (C. of E.) Controlled Junior School;
- Liphook Infant School; and
- Bohunt School.

It is unlikely that any strategic mitigation option could remove the need for these trips to travel through The Square.

Figure 4-3 Strategic Traffic – School Drop-Off / Pick-Up



4.5. Survey Results

The following section outlines the proportion of strategic traffic (excluding those dropping off at school) travelling through Liphook during the survey periods.

4.5.1. AM (0700-1000)

A total of 60 vehicles travelled via the double mini-roundabouts from the A3 to Haslemere (ANPR site C) in the AM (0700-1000) peak; with 31 vehicles accessing Liphook via the A3 at Longmoor Road (ANPR site A) and 29 vehicles via London Road (ANPR site B).

A total of 47 vehicles were recorded accessing the A3 from Haslemere (ANPR C) via the double mini-roundabouts in the AM (0700-1000) peak; with 33 accessing via Longmoor Road (ANPR A) and 14 vehicles via London Road (ANPR B).

4.5.2. PM (1500-1900)

A total of 159 vehicles travelled via the double mini-roundabouts from the A3 to Haslemere (ANPR C) in the PM (1500-1900) peak; with 26 vehicles accessing Liphook via the A3 at Longmoor Road (ANPR A) and 133 vehicles via London Road (ANPR B).

A total of 111 vehicles were recorded accessing the A3 from Haslemere (ANPR C) via the double mini-roundabouts in the PM (1500-1900) peak; with 73 accessing via Longmoor Road (ANPR A) and 38 vehicles via London Road (ANPR B).

4.6. Average ANPR Journey Time

Table 1 outlines the average journey time for vehicles travelling between the A3 (ANPR sites A and B as shown in Figure 4-3) and Haslemere (ANPR site C). School traffic has been excluded from these calculations.

Table 1 Strategic Vehicles - Average Journey Time

Route	AM Peak (0700-1000)	PM Peak (1500-1900)
A3 (via Longmoor Rd) to Haslemere (ANPR A-C)	10 mins	10 mins
A3 (via London Rd) to Haslemere (ANPR B-C)	8 mins	12 mins
Haslemere to A3 (via Longmoor Rd) (ANPR C-A)	11 mins	11 mins
Haslemere to A3 (via London Rd) (ANPR C-B)	13 mins	12 mins

As shown in Table 1, the average journey time of strategic traffic travelling between the A3 and Haslemere is under 13 minutes.

4.7. School Drop-Off / Pick-Up

Table 2 outlines the volume of strategic traffic travelling on route between the A3 and Haslemere that stop off at either Liphook Infant and Junior School as well as Bohunt School (with no other intermediary stops). The time the journey took is shown in brackets.

Table 2 Strategic Vehicles – School Drop-Off / Pick-Up

Route	AM Peak (0700-1000)	PM Peak (1500-1900)
A3 (via Longmoor Rd) to Haslemere (ANPR A-C)	1 (13 mins)	0
A3 (via London Rd) to Haslemere (ANPR B-C)	1 (14 mins)	1 (18 mins)
Haslemere to A3 (via Longmoor Rd) (ANPR C-A)	1 (10 mins)	1 (28 mins)
Haslemere to A3 (via London Rd) (ANPR C-B)	0	0

4.8. Summary

The analysis presented above indicates that the volume of A3 strategic traffic travelling through Liphook (and the double mini-roundabouts at The Square) at peak times is low (accounting for c.2-3% of all traffic travelling between the double mini-roundabouts). Consequently, it is unlikely that a modified A3 signage strategy would have a significant impact (by reducing traffic volumes) on the operation of the double mini-roundabouts and the B2131 Haslemere Road / Midhurst Road mini-roundabout at peak times.

5. Traffic and The Square

5.1. Introduction

Utilising the results of both the ANPR and Junction Turning Count surveys, this chapter considers the impact of all traffic (local, external and strategic) that was observed:

- Travelling in and out of Liphook (which may not have travelled via the double mini-roundabouts); and
- All traffic which has travelled via the double mini-roundabouts.

This section also considers school traffic and Station Road traffic.

5.2. ANPR Captured Traffic Entering and Exiting Liphook

This section outlines the proportion of traffic captured by the ANPR cameras entering and exiting Liphook during the AM and PM survey periods.

5.2.1. AM Peak (0700-1000)

5.2.1.1. All Traffic

Table 3 outlines the proportion of all traffic (local, external and strategic) captured by the ANPR cameras entering and exiting Liphook (via all roads) during the AM peak period which may or not may have had an intermediary stop.

Table 3 ANPR Captured Traffic Entering and Exiting Liphook

Route	Vehicle No.	% of traffic
All Traffic Entering Liphook (4237 Vehicles)		
Traffic entering and then exiting Liphook (via all roads)	2477	57%
Traffic entering (via all roads) and staying in Liphook	1850	43%
All Traffic Exiting Liphook (5232 Vehicles)		
Traffic entering and then exiting Liphook (via all roads)	2477	47%
Local traffic exiting Liphook (via all roads)	2755	53%

As shown in Table 3, a roughly even split of external and local traffic enters and exits Liphook in the AM peak.

5.2.1.2. Through Traffic

In terms of the 2,477 vehicles entering and exiting Liphook (via all roads) during the AM peak period, 1,811 vehicles (73%) were through traffic (i.e. no intermediary stop; a journey time <30 minutes).

Table 4 outlines the percentage of this traffic which originates / exits via the A3 (which includes those strategic vehicles as outlined in **Section 3**) or the local roads (i.e. Headley Road and Midhurst Road) leading into / out of Liphook.

Table 4 Traffic Entering and Exiting Liphook (Through Traffic)

Route	Vehicle No.	% of traffic
Through Traffic Entering Liphook (1811 Vehicles)		
Originating from the A3	424	23%
Originating from local roads	1387	77%
Through Traffic Exiting Liphook (1811 Vehicles)		
Exiting via the A3	563	31%
Exiting via local roads	1248	69%

As shown in Table 4, the majority of through traffic enters and exits Liphook via local roads and is therefore considered to be local traffic.

5.2.2. PM (1500-1900)

5.2.2.1. All Traffic

Table 5 outlines the proportion of all traffic (local, external and strategic) captured by the ANPR cameras entering and exiting Liphook (via all roads) during the PM peak period which may or not may have had an intermediary stop.

Table 5 ANPR Captured Traffic Entering and Exiting Liphook

Route	Vehicle No.	% of traffic
All Traffic Entering Liphook (6526 Vehicles)		
Traffic entering and then exiting Liphook (via all roads)	3555	54%
Traffic entering (via all roads) and staying in Liphook	2971	46%
All Traffic Exiting Liphook (6677 Vehicles)		
Traffic entering and then exiting Liphook (via all roads)	3555	53%
Local traffic exiting Liphook (via all roads)	3122	47%

As shown in Table 5, a roughly even split of external and local traffic enters and exits Liphook in the PM peak.

5.2.2.2. Through Traffic

In terms of the 3,555 vehicles entering and exiting Liphook (via all roads) during the PM peak period, 2,601 vehicles (73%) accounted for through traffic (i.e. no intermediary stop; a journey time <30 minutes).

Table 6 outlines the percentage of this traffic which originates / exits via the A3 (which includes those strategic vehicles as outlined in **Section 3**) or the local roads (i.e. Headley Road and Midhurst Road) leading into / out of the village.

Table 6 Traffic Entering and Exiting Liphook (Through Traffic)

Route	Vehicle No.	% of traffic
Through Traffic Entering Liphook (2601 Vehicles)		
Originating from the A3	967	37%
Originating from local roads	1634	63%
Through Traffic Exiting Liphook (2601 Vehicles)		
Exiting via the A3	519	20%
Exiting via local roads	2082	80%

As shown in Table 6, the majority of through traffic enters and exits Liphook via local roads in the PM peak and is therefore considered to be local traffic.

5.3. Predominant Vehicle Movement

The majority of vehicles entering and exiting Liphook during the AM and PM peak was recorded travelling via the following roads:

- AM (0700-1000)
 - Most vehicles entered Liphook from Headley Road (1386 vehicles); and
 - Most vehicles exited Liphook from London Road (and the A3) (1476 vehicles).
- PM (1500-1900)
 - Most vehicles entered Liphook from London Road (and the A3) (2082 vehicles); and
 - Most vehicles exited Liphook from Headley Road (1867 vehicles).

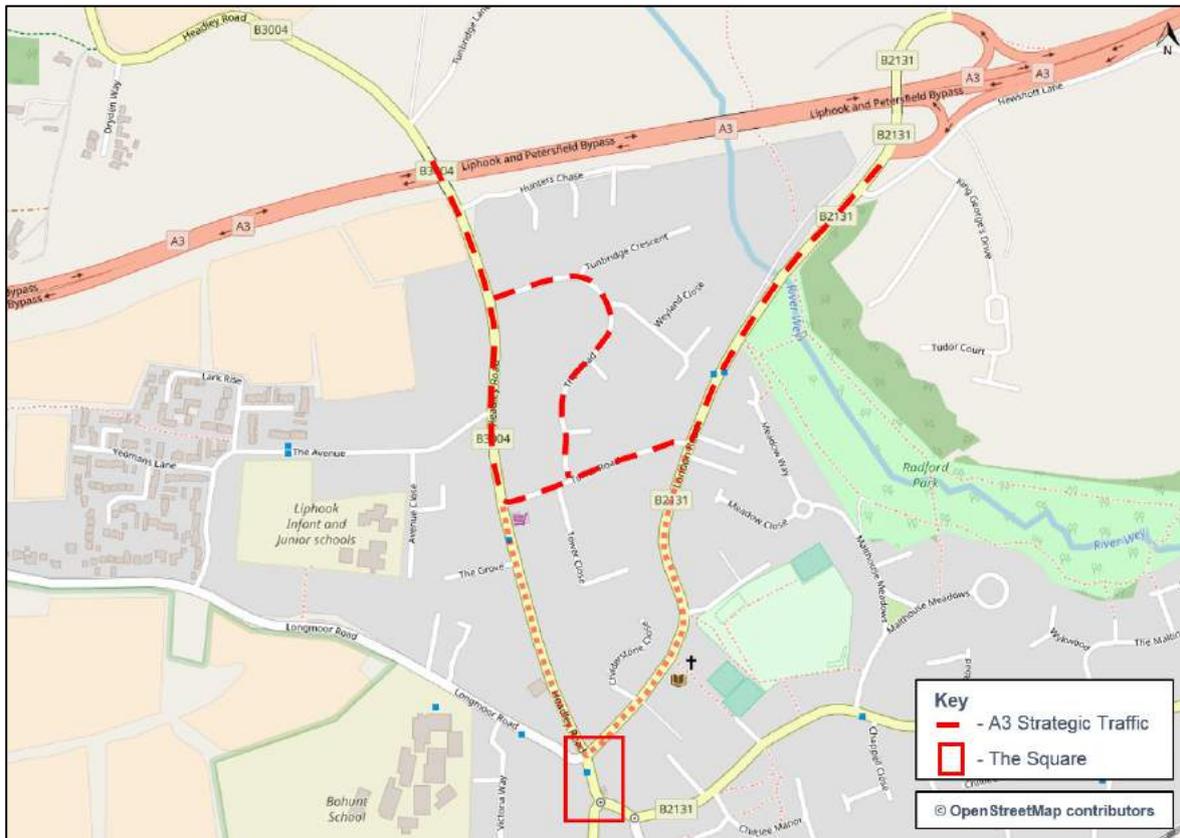
The analysis of the ANPR surveys demonstrated that the predominant vehicle movement recorded (Matched Origin / Destination Pairs) in Liphook during the AM (0700-1000) survey period was traffic originating from Headley Road (to the north of Liphook) and exiting via London Road (to the north-east of Liphook). A total of 292 vehicles were recorded undertaking this movement.

With only 57 vehicles recorded during the Junction Turning Counts as travelling from Headley Road to London Road during the AM (0700-1000) survey at the northern mini-roundabout at The Square (as shown in Figure 4-3) it can be assumed that the majority of vehicles are travelling via Tower Road (incorporating Tunbridge Crescent and The Mead) avoiding The Square as shown in **Figure 5-1**.

The analysis of the ANPR surveys also demonstrated that the predominant vehicle movement undertaken in Liphook during the PM (1500-1900) survey period was traffic travelling between London Road and Headley Road (which is a reversal of the AM (0700-1000) trend). A total of 352 vehicles were recorded during the ANPR surveys undertaking this movement.

With only 77 vehicles recorded during the Junction Turning Counts as travelling from London Road to Headley Road during the PM (1500-1900) survey at the northern mini-roundabout at The Square (as shown in Figure 4-4) it can be assumed that the majority of vehicles are travelling via Tower Road (incorporating The Mead and Tunbridge Crescent as shown in Figure 5-1) thus again, avoiding The Square.

Figure 5-1 Headley Road - London Road Routing (via Tunbridge Crescent and The Mead)



5.3.1. Summary

The predominant movement recorded during the ANPR surveys for the AM and PM peak period (Headley Road to London Road and vice-versa) suggests that traffic from Whitehill and Bordon (to the north-west of Liphook) is accessing / egressing the A3 via Liphook instead of the A325 at Longmoor to the west of Liphook. This may reflect current congestion at the Longmoor Junction and it being quicker to go via Liphook. It should be noted that road works were being carried out on the A325 at Whitehill and Bordon to the new roundabouts at the southern end of the new relief road during the traffic surveys, which may have inadvertently skewed the results.

Furthermore, none of the strategic mitigation options proposed would fundamentally accommodate this movement.

5.4. Double Mini-Roundabouts

Table 7 and **Table 8** outline the proportion of Liphook traffic that is considered local (i.e. with an origin or destination within Liphook) or external (i.e. non-local traffic passing through Liphook, including those strategic vehicles as outlined in Section 3) in relation to the traffic movements at the double mini-roundabouts for the AM (0700-1000) and PM (1500-1900) peak.

5.4.1. AM Peak (0700-1000)

Table 7 Double Mini-Roundabouts (0700-1000)

Route	Vehicle No.	% of traffic
Traffic entering and exiting the Double Mini-Roundabouts (c.4500 Vehicles)		
Traffic entering and then exiting Liphook (via all roads) – External Traffic	c.1500	c.35%
Local Traffic	c.3000	c.65%

As shown in Table 7, during the AM peak (0700-1000) the majority of traffic travelling through the double mini-roundabouts is local traffic.

5.4.2. PM (1500-1900)

Table 8 Double Mini-Roundabouts (1500-1900)

Route	Vehicle No.	% of traffic
Traffic entering and exiting the Double Mini-Roundabouts (c.7000 Vehicles)		
Traffic entering and then exiting Liphook (via all roads) – External Traffic	c.2500	c.35%
Local Traffic	c.4500	c.65%

As shown in Table 8 during the PM peak (1500-1900) the majority of traffic travelling through the double mini-roundabouts is again local traffic.

5.5. School Pick-Up / Drop-Off

This section considers the proportion of school pick-up / drop-off traffic that is considered to be local or external.

During the AM (0700-1000) and PM (1500-1900) peak, a total of 599 registration plates were recorded dropping-off / picking-up school children. These number plates were identified within the ANPR surveys and can be categorised as follows.

Table 9 Vehicles – School Drop-Off / Pick-Up

Traffic	No. of Vehicles	% of traffic
Traffic entering and exiting Liphook (via all roads)	190	31%
Traffic entering (via all roads) and staying in Liphook	176	29%
Local traffic exiting Liphook (via all roads)	189	31%
Local traffic staying in Liphook	44	7%
Total Vehicles	599	100%

As shown in Table 8, the majority of traffic that pick-up / drop-off school children is local traffic (all traffic outlined in the table above excluding traffic entering and exiting Liphook).

5.5.1. Predominant Vehicle Movement

The most vehicles entering and exiting Liphook during the AM and PM peak to drop-off / pick-up school children was via the following roads:

- AM (0700-1000)
 - Most vehicles entered (87 vehicles) and exited (57 vehicles) Liphook from Headley Road to drop-off school children; and
- PM (1500-1900)
 - Most vehicles entered (98 vehicles) and exited (106 vehicles) Liphook from Headley Road to pick-up school children.

Furthermore, in terms of the 190 vehicles that enters and exits Liphook (via all roads) that pick-up / drop school children, on average 26% (49 vehicles (including the five strategic vehicles travelling to / from the A3 and Haslemere) access and exit via the A3).

5.5.2. School Drop-Off / Pick-Up – Use of The Avenue

The manual number plate surveys undertaken on the roads in the vicinity of both Liphook Infant and Junior School and Bohunt School were fundamentally undertaken to identify traffic that is dropping-off / picking-up school children, however they were also undertaken due to the following:

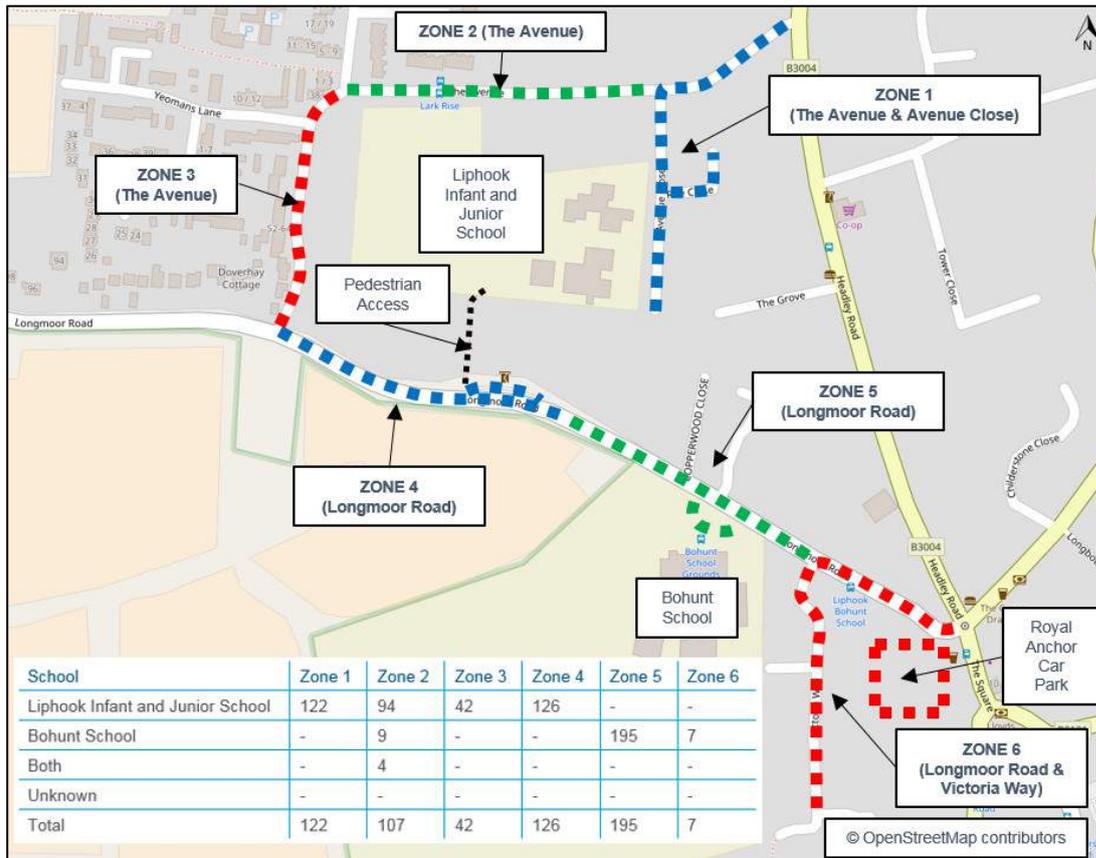
- There is a perception that The Avenue is being utilised as a drop-off / pick-up for pupils associated with Bohunt School (thus avoiding The Square) resulting in congestion and conflict with residential and Liphook Infant and Junior School traffic.

To understand if this occurs in practice, the roads in the vicinity of the schools were divided into zones. Vehicles associated with each of the schools were then recorded dropping-off / picking-up in each zone.

Figure 5-2 illustrates the zones and the number of vehicles associated with each school dropping-off / picking-up in each zone as follows:

- Zone 1 – The Avenue (from the junction with Headley Road to the junction with Avenue Close (incorporating Liphook Infant and Junior School) and Avenue Close itself;
- Zone 2 – The Avenue (from the junction with Avenue Close to the junction with Lark Rise);
- Zone 3 – The Avenue (from the junction with Lark Rise to the junction with Longmoor Road);
- Zone 4 – Longmoor Road (from the junction with The Avenue to the layby comprising a pedestrian access to Liphook Infant and Junior School);
- Zone 5 – Longmoor Road (from the pedestrian access layby to the junction with Victoria Way (incorporating Bohunt School); and
- Zone 6 – Longmoor Road (from the Victoria Way junction to The Square, incorporating the Royal Anchor Public House Car Park).

Figure 5-2 School Drop-Off / Pick-Up Surveys



5.5.3. Summary

As shown in Figure 5-2:

- Vehicles in Zone 1 / 2 / 3 / 4 were predominately recorded dropping-off / picking-up pupils from Liphook Infant and Junior School (384 vehicles);
- Nine vehicles were recorded dropping-off / picking-up pupils from Bohunt School in Zone 2;
- Four vehicles were recorded each dropping-off / picking-up pupils from both schools (via Zone 2); and
- 202 vehicles were recorded dropping-off / picking-up pupils from Bohunt School via Zone 5 and Zone 6.

The results indicate that only nine vehicles were recorded dropping-off / picking-up pupils from Bohunt School along The Avenue, therefore the results of the traffic surveys do not support the current perception as generally pupils of Bohunt School do not get dropped off on The Avenue.

5.6. Station Road

An additional requirement of the study brief was to monitor traffic travelling between Haslemere and the B2070 Portsmouth Road via Station Road and not via the double mini-roundabouts at The Square (due to congestion). Consequently, ANPR location G (Station Road) was incorporated into the survey programme (as shown in Figure 3-1).

Table 10 outlines that number of vehicles recorded travelling between these two locations and those that were recorded travelling via Station Road.

Table 10 Haslemere to Portsmouth Road (and vice-versa)

Movement Matrix	AM (0700-1000)		PM (1500-1900)	
	No. of Vehicles	Via G – Station Rd (%)	No. of Vehicles	Via G – Station Rd (%)
C – Liphook Rd (Haslemere) to F – Portsmouth Rd	19	1 (5%)	66	21 (32%)
F – Portsmouth Rd to C – Liphook Rd (Haslemere)	36	6 (17%)	34	11 (32%)

As shown in Table 10, the following number of vehicles (and percentage of the total) were recorded travelling via Station Road:

- AM survey period – 1 out of 19 vehicles (5%); and
- PM survey period – 21 out of 66 vehicles (32%).

In terms of vehicles travelling in the opposite direction via Station Road:

- AM survey period – 6 out of 36 vehicles (17%); and
- PM survey period – 11 out of 34 vehicles (32%).

It can be concluded that the majority of vehicles travelling between Haslemere and Portsmouth Road travel via The Square and not Station Road (with a maximum of 32% travelling via Station Road (and presumably Liphook Rail Station)).

Furthermore, **Table 11** illustrates the number of vehicles recorded travelling along Station Road (in both directions) in the AM (0700-1000) and PM (1500-1900) peak that originated or had a destination outside of Liphook.

Table 11 Station Road Traffic

Traffic	AM (0700-1000)		PM (1500-1900)	
	No. of Vehicles	%	No. of Vehicles	Via G – Station Rd (%)
Total Traffic	1343	-	1862	-
Traffic with an origin / destination outside of Liphook	484	36%	670	36%
Local Traffic	859	64%	1192	64%

As shown in Table 11, the results of the ANPR survey indicate that the majority of trips along Station Road is local traffic.

6. Strategic Mitigation Options

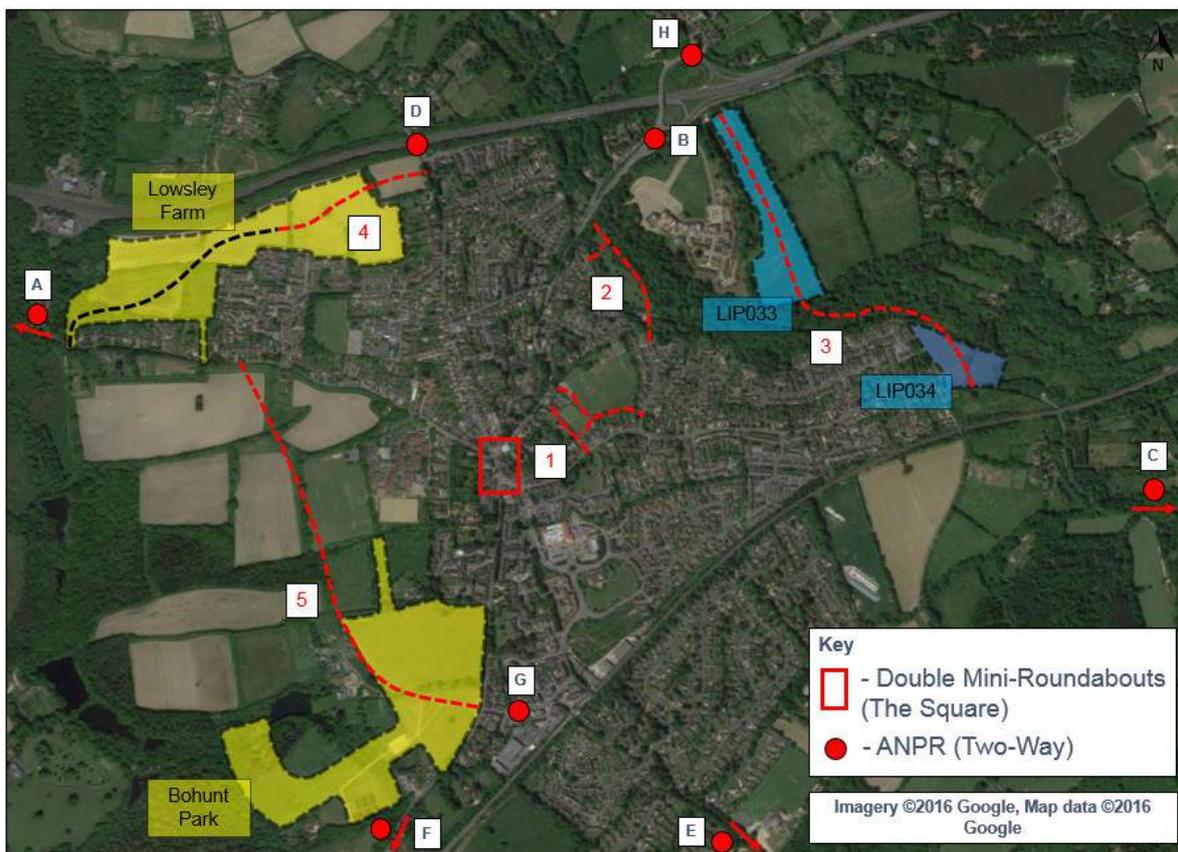
6.1. Introduction

This section provides a high-level assessment of the strategic mitigation options utilising the analysis presented earlier in this report.

6.2. Strategic Mitigation Options

The five strategic options are shown in **Figure 6-1** with a detailed description from the Phase I study outlining the benefits and constraints of each option also provided underneath.

Figure 6-1 Strategic Mitigation Options and corresponding ANPR Locations



6.2.1. Option 1 – B2131 Haslemere Road to B2131 London Road Link

This option would involve construction of a new short road link through the recreational area directly to the east of the centre of Liphook.

Benefits

- Could be developed to allow a one-way gyratory to operate within the centre of Liphook; with the new road link forming the eastern side, B2131 Haslemere Road the southern side, B2131 London Road the northern side and the area connecting the existing double mini-roundabouts as the western side;
- A one-way gyratory could potentially provide additional benefits associated with the removal of opposed right turn movements;
- Relatively short section of link road required; and
- Does not cross over the River Wey.

Constraints

- It is understood that the area in question is the 'Memorial Recreation Ground', which is a Memorial to those that fell during the First World War.

6.2.2. Option 2 – Meadow Way or Malthouse Meadows to B2131 London Road Link

This option would involve construction of a new road link through Radford Park to connect B2131 London Road with either Meadow Way or Malthouse Meadows.

Benefits

- Relatively short section of link road required; and
- Does not cross over the River Wey.

Constraints

- May require demolition of six garages; and
- Encroaches upon Radford Park; one of the old water meadows within Bramshott and Liphook and now a designated area for leisure and recreation.

6.2.3. Option 3 – New Eastern Developments Link Road

This option would complement future housing allocations included in the 'Strategic Housing Land Availability Assessment 2014²'. It would involve constructing a new road link through housing allocation sites LIP033 (Land East of Bramshott Place) and LIP034 (Land East of Stonehouse Road and north of Haslemere Road) which would need to be connected via a new structure across the River Wey.

Benefits

- Utilises future housing allocations within Liphook and could be included as part of the developments masterplans.

Constraints

- Potential encroachment upon Radford Park; one of the old water meadows within Bramshott and Liphook and now a designated area for leisure and recreation; and
- Link road would need to cross the River Wey and could therefore require expensive infrastructure.

6.2.4. Option 4 – Lowsley Farm Link Road

This option consists of extending the Lowsley Farm access road to form a link with the B3004 Headley Road.

Benefits

- Would improve the east-west accessibility of the area;
- May reduce traffic flows past the schools on The Avenue;
- Minimise the need for 'Lowsley Farm' development traffic to travel through the northern mini-roundabout in the centre of Liphook; and
- Relatively short section of link road required.

Constraints

- May result in further 'rat running' along The Mead and / or Tower Road;
- Would re-assign a relatively small proportion of peak period traffic through Liphook northern mini-roundabout;
- May encourage traffic to pass through small villages north of Liphook; and
- The link road would be aligned through an area of SANG (Suitable Alternative Natural Greenspace).

² East Hampshire District Council. *Strategic Housing Land Availability Assessment 2014 Included & Excluded Sites – Liphook*. Available online: <http://www.easthants.gov.uk/sites/default/files/documents/LiphookSHLAA2014.pdf> [Accessed: 22/05/18]

6.2.5. Option 5 – ‘The Northcott Trust’ Western Ring Road

This option would involve construction of a new road link through the South Downs Natural Park (SDNP).

Benefits

- Could possibly open up land for development, improve development land accessibility whilst also providing an alternative access to Bohunt School³; and
- Re-assign traffic generated from developments north of Liphook (Whitehill and Bordon) accessing Liphook (and the rail station) away from the Liphook double mini-roundabouts and small villages, north of Liphook.

Constraints

- The area is part of the South Downs Natural Park (SDNP).

6.3. High-Level Analysis

The following section outlines the range of flows that could bypass the double mini-roundabouts with each strategic mitigation option for the AM Peak hour (0730-0830) and PM Peak hour (1700-1800).

To provide traffic forecasts for each of the strategic mitigation options, traffic flows recorded during the ANPR surveys (envisaged minimum traffic flows) and the Junction Turning Counts (envisaged maximum traffic flows) were reassigned using professional judgement in terms of possible routing of traffic to access the strategic mitigation options.

6.3.1. Phase I – Development Traffic

The high-level analysis has accounted for the following developments (that were outlined in the Phase I report) that were fully built out at the time of the traffic surveys:

- Silent Gardens – 128 dwellings; and
- Bohunt 6th Form College Expansion – 400 students and 21 staff.

It is understood that the remaining developments, Chitley Farm (100 dwellings) has been refused, and Lowsley Farm (330 dwellings) was partially built out at the time of the traffic surveys.

6.3.2. Potential Traffic Flows

The high-level analysis undertaken estimated that the following range of traffic flows (minimum flows which are vehicles recorded by the ANPR cameras and maximum flows which are vehicles recorded during the Junction Turning Counts) that could potentially divert away from the double mini-roundabouts:

- Strategic Mitigation Options 1 / 2 or 3 (which all provide a link from Haslemere Road to London Road and therefore each option is envisaged to potentially divert the same flows i.e. not cumulative):
 - 171 to 583 vehicles in the AM (0730-0830) peak hour; and
 - 173 to 640 vehicles in the PM (1700-1800) peak hour.
- Strategic Mitigation Option 4 (north-west of The Square);
 - 50 to 128 vehicles in the AM (0730-0830) peak hour; and
 - 23 to 154 vehicles in the PM (1700-1800) peak hour.
- Strategic Mitigation Option 5 (west of The Square);
 - 83 to 442 vehicles in the AM (0730-0830) peak hour; and
 - 73 to 494 vehicles in the PM (1700-1800) peak hour.

The high-level analysis indicates that a strategic mitigation option which would provide a new road link between the east of Liphook (i.e. Haslemere Road) and the north of Liphook (i.e. London Road) would provide the greatest level of traffic relief to the double mini-roundabouts at The Square (i.e.

³ The Northcott Trust. *A Strategic Vision for Liphook*. Available online: <http://www.liphookvision.com/> [Accessed: 22/05/18]

Strategic Mitigation Options 1, 2 or 3). This is supported by the predominant movement recorded during the Junction Turning Counts at The Square (as shown in **Appendix B**).

6.3.3. Assessment of Strategic Mitigation Options

The following section outlines the assessment of the five strategic mitigation options (**Table 12**). It is a broad and subjective assessment based on the available data and professional judgment. The assessment has taken into consideration the following for each strategic mitigation option:

- Traffic relief to the double mini-roundabouts; and
- High-level analysis in terms of scheme costs (against the proposed benefit) including outlining known constraints and possible impact on local roads.

Table 12 Strategic Mitigation Options - High Level Scoring

Option	Traffic Relief (The Square)	Scheme Costs	Risks	Other Comments	Rating
Option 1 – B2131 Haslemere Road to B2131 London Road Link	High	Moderate	<ul style="list-style-type: none"> • Possible opposition - Memorial • Possibility of high reassignment of traffic along local roads 	<ul style="list-style-type: none"> • Relatively short section of link road • Does not cross over the River Wey 	1
Option 2 – Meadow Way or Malthouse Meadows to B2131 London Road Link	High	High	<ul style="list-style-type: none"> • Possible opposition (Radford Park) • Possible demolition of garages • Possibility of high reassignment of traffic along local roads 	<ul style="list-style-type: none"> • Relatively short section of link road • Does not cross over the River Wey 	2
Option 3 – New Eastern Developments Link Road	High	High	<ul style="list-style-type: none"> • Possible opposition (Radford Park) • Possibility of high reassignment of traffic along local roads • Very expensive 	<ul style="list-style-type: none"> • Utilises (could be part of) future housing allocations • Does cross the River Wey • Relatively long section of link road 	3
Option 4 – Lowsley Farm Link Road	Low	Moderate	<ul style="list-style-type: none"> • Aligned through an area of SANG 	<ul style="list-style-type: none"> • Relatively short section of link road 	5
Option 5 – 'The Northcott Trust' Western Ring Road	Medium	High	<ul style="list-style-type: none"> • Aligned through SDNP • Possibility of high reassignment of traffic along local roads • Very expensive 	<ul style="list-style-type: none"> • Open up land for development • Improve accessibility to Bohunt School • Longest section of link road 	4

The high-level assessment of the strategic mitigation options has resulted in the following ranking:

1. Option 1 – B2131 Haslemere Road to B2131 London Road Link;
2. Option 2 – Meadow Way or Malthouse Meadows to B2131 London Road Link;
3. Option 3 – New Eastern Developments Link Road;
4. Option 5 – ‘The Northcott Trust’ Western Ring Road; and
5. Option 4 – Lowsley Farm Link Road.

6.3.4. Summary

The high-level analysis of the strategic mitigation options suggests that Strategic Mitigation Options 1, 2 or 3 (which all provide a road link from Haslemere Road to London Road) could provide the most relief to the double mini-roundabouts but, could result in a reassignment of traffic along inappropriate local roads. These options were also identified in the Phase I study to have significant constraints in that they are currently aligned through the ‘Memorial Recreation Ground’ and ‘Radford Park’. This is also applicable to Option 5 (‘The Northcott Trust’ Western Ring Road), which also has the constraint of being aligned through the SDNP and is estimated to be a very expensive option (due to the length and nature of the SDNP i.e. waterways etc.). Option 4 (The Lowsley Farm Link Road) is deemed not to be a viable option, providing the lowest relief to the double mini-roundabouts, including the constraint of being aligned through an area of SANG.

7. Conclusion

The study has concluded that a significant proportion of traffic travelling through the double mini-roundabouts is not strategic traffic, therefore a revised signage strategy is not warranted.

The high-level analysis of the strategic mitigation options suggests that Strategic Mitigation Options 1, 2 or 3 (which all provide a road link from Haslemere Road to London Road) could provide the most relief to the double mini-roundabouts but, could result in a reassignment of traffic along inappropriate local roads. These options were also identified in the Phase I study to have significant constraints in that they are currently aligned through the 'Memorial Recreation Ground' and 'Radford Park'. This is also applicable to Option 5 ('The Northcott Trust' Western Ring Road), which also has the constraint of being aligned through the SDNP and is estimated to be a very expensive option (due to the length and nature of the SDNP i.e. waterways etc.). Option 4 (The Lowsley Farm Link Road) is deemed not to be a viable option, providing the lowest relief to the double mini-roundabouts, including the constraint of being aligned through an area of SANG.

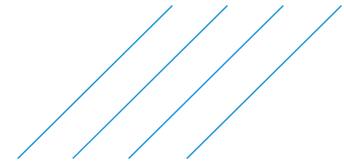
Therefore, it is recommended that further assessment is undertaken on the double mini-roundabouts at The Square (including the pedestrian crossing) to understand the potential relief that can be attributable to removing traffic from the network from the implementation of sustainable transport options / initiatives (i.e. school / workplace travel planning promoting cycling / walking / public transport and discouraging driving).

This is based on the following findings from the traffic surveys:

- A high proportion of traffic travelling through Liphook at peak times (particularly at the double mini-roundabouts) is local traffic;
- Most vehicles dropping-off / picking-up school children access and exit the schools via Headley Road; and
- None of the strategic mitigation options proposed would accommodate the predominant movement recorded during the ANPR surveys for the AM and PM peak period (Headley Road to London Road and vice-versa).

Appendices

Appendix A. Origin and Destination Survey Methods



Technical Note

Project:	Liphook Phase II Transport Feasibility Study		
Subject:	Origin and Destination Survey Methods		
Author:	Atkins	Atkins No.:	
Date:	July 2018	Icepac No.:	
		Project No.:	5161097
Distribution:	HCC	Representing:	Atkins

Origin and Destination Survey Methods

A number of survey methods are available to determine the origin and destination of strategic and local vehicular traffic within Liphook. These methods include:

- Automatic Number Plate Recognition (ANPR);
- Bluetooth;
- The North Hampshire Traffic Model (NHTM);
- Anonymised Mobile Network Data (MND); and
- INRIX (utilises Satellite Navigation data and fleet data).

An appraisal of the options is provided below in **Table 1** to determine the most appropriate (and cost effective) method for this study.

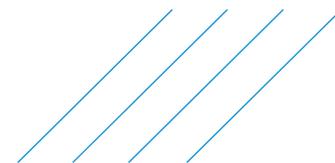
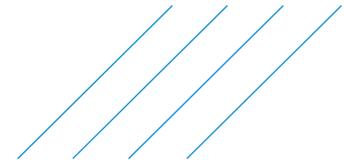


Table 1 Origin / Destination Traffic Survey Method Appraisal

Survey Method	Description	Pros / Cons	Suitability	Cost (circa)
ANPR	Utilising ANPR cameras (two-way) to record vehicle number plates.	<ul style="list-style-type: none"> • High sample size and accuracy • Relatively inexpensive 	✓	£1000s
Bluetooth	Utilising Bluetooth sensors to pick-up Bluetooth codes emitted by passing vehicles.	<ul style="list-style-type: none"> • Lower sample size than ANPR 	✗	ANPR is more accurate
NHTM	Land Use Transport Model for North Hampshire.	<ul style="list-style-type: none"> • Not observed data • Liphook situated on the edge of the core area • Limited modelled data 	✗	N/A
MND	MND utilises journey paths between the network of 3G / 4G masts to understand trips. The data is anonymous.	<ul style="list-style-type: none"> • Comprehensive data • Very expensive • New data collection period and full analysis required 	✓	£40,000 - £50,000
INRIX	INRIX predominately utilises Satellite Navigation data and fleet data.	<ul style="list-style-type: none"> • Comprehensive data • Biased towards fleet vehicles which are envisaged not to divert through Liphook. 	✗	N/A

As shown in Table 1, the most suitable method (based on sample size, quality and cost) for this study was ANPR surveys.

Appendix B. Junction Turning Counts



Technical Note

Project:	Liphook Phase II Transport Feasibility Study		
Subject:	Junction Turning Counts		
Author:	Atkins	Atkins No.:	
Date:	July 2018	Icepac No.:	
		Project No.:	5161097
Distribution:	HCC	Representing:	Atkins

Junction Turning Counts

1.1. Introduction

Junction Turning Counts were undertaken on the double mini-roundabouts at The Square and the B2131 Haslemere Road / Midhurst Road mini-roundabout (**Figure 1-1**).

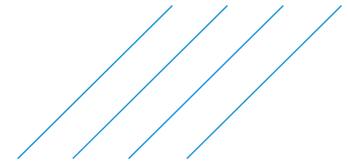
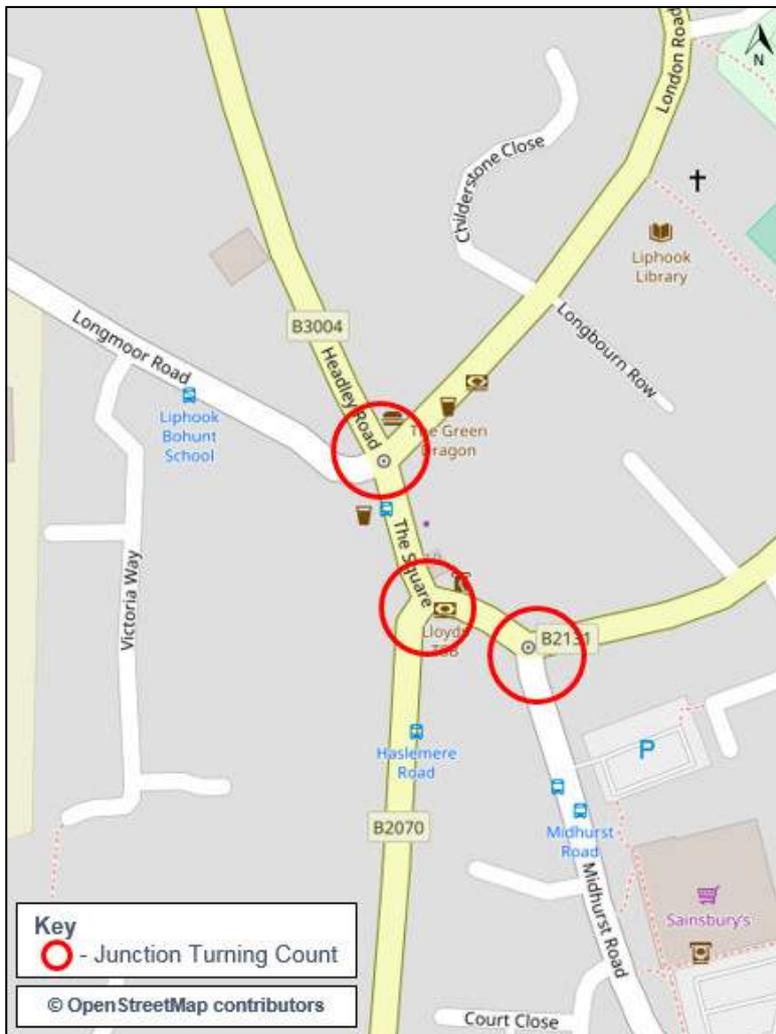
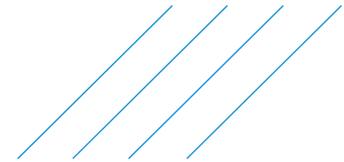


Figure 1-1 Junction Turning Counts



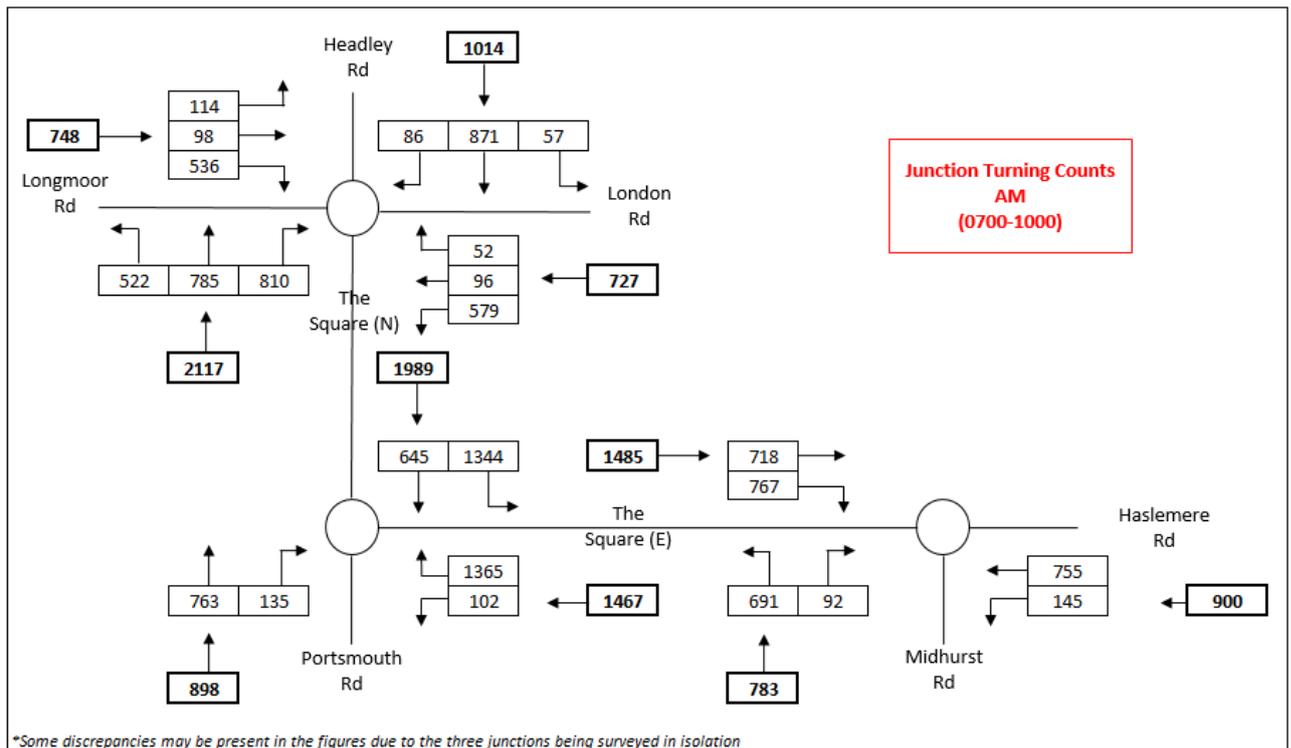


1.2. Overview

1.2.1. AM Survey (0700-1000)

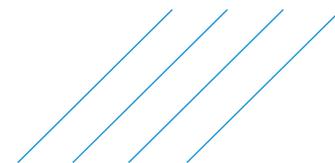
The results of the Junction Turning Counts undertaken for the AM survey (0700-1000) is shown in Figure 1-2.

Figure 1-2 Junction Turning Count – AM (0700-1000)



In relation to the traffic flows surveyed during the AM survey (0700-1000), the following patterns were observed:

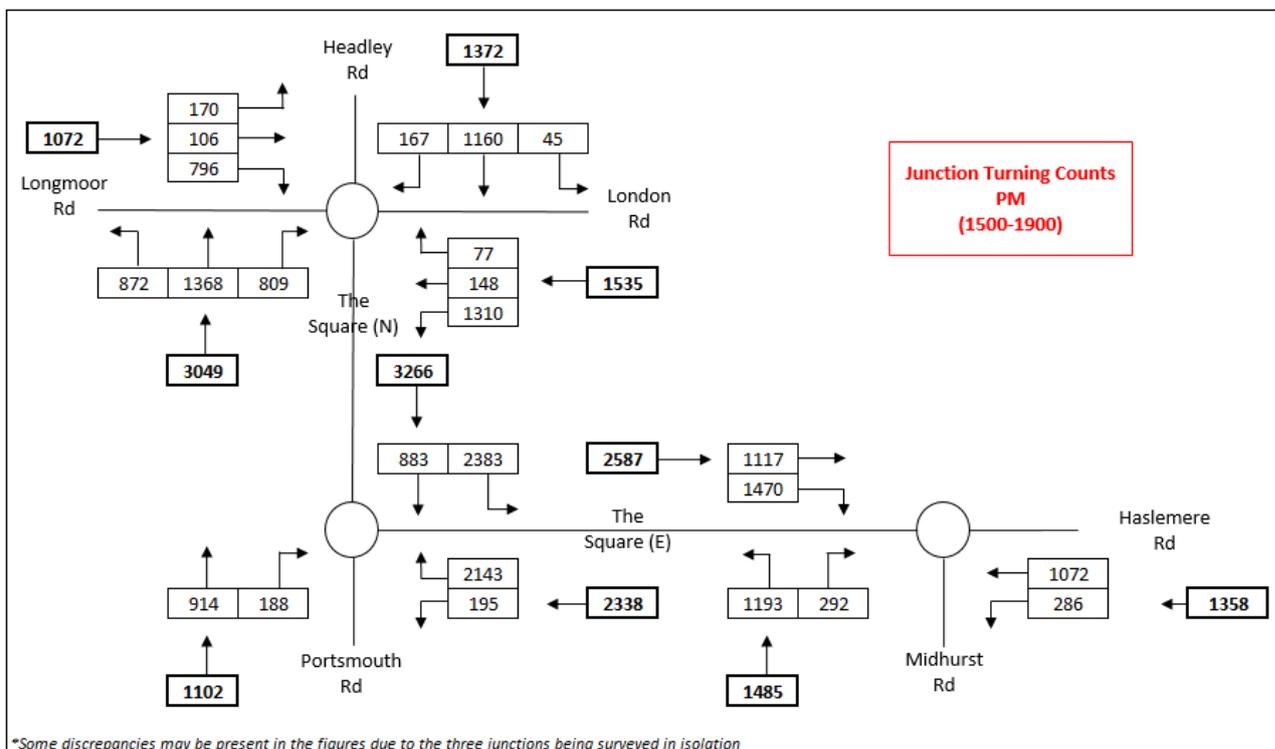
- The northern mini-roundabout;
 - The highest traffic flow originated from The Square (N) (2117 vehicles); and
 - The highest traffic flow movement was Headley Road to The Square (N) (871 vehicles);
- The southern mini-roundabout;
 - The highest traffic flow originated from The Square (N) (1989 vehicles); and
 - The highest traffic flow movement was The Square (E) to The Square (N) (1365 vehicles);
- B2131 Haslemere Road / Midhurst Road mini-roundabout;
 - The highest traffic flow originated from The Square (E) (1485 vehicles); and
 - The highest traffic flow movement was The Square (E) to Midhurst Road (767 vehicles).



1.2.2. PM Survey (1500-1900)

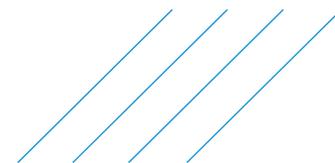
The results of the Junction Turning Counts undertaken for the PM survey (1500-1900) is shown in Figure 1-3.

Figure 1-3 Junction Turning Count – PM (1500-1900)



In relation to the traffic flows surveyed during the PM survey (1500-1900):

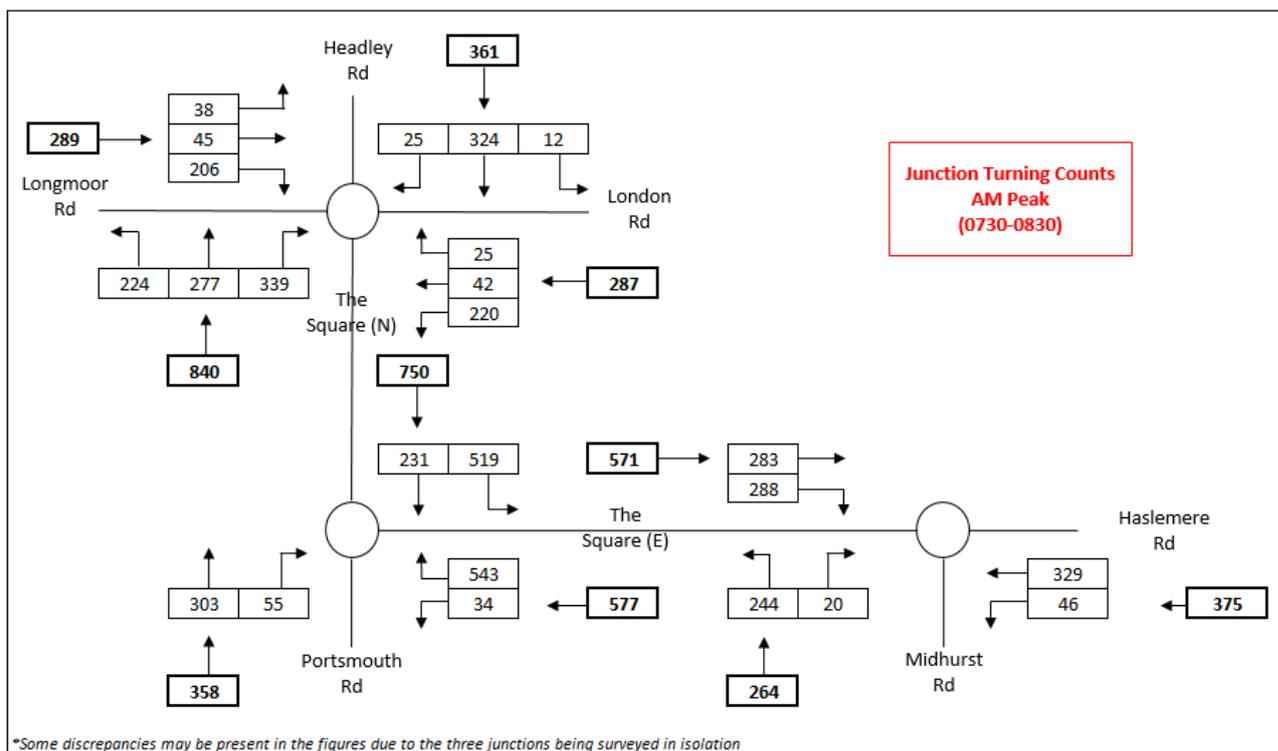
- The northern mini-roundabout;
 - The highest traffic flow originated from The Square (N) (3049 vehicles); and
 - The highest traffic flow movement was The Square (N) to Headley Road (1368 vehicles);
- The southern mini-roundabout;
 - The highest traffic flow originated from The Square (N) (3266 vehicles); and
 - The highest traffic flow movement was The Square (N) to The Square (E) (2383 vehicles);
- B2131 Haslemere Road / Midhurst Road mini-roundabout;
 - The highest traffic flow originated from The Square (E) (2587 vehicles); and
 - The highest traffic flow movement was The Square (E) to Midhurst Road (1470 vehicles).



1.2.3. AM Peak Hour (0730-0830)

The Junction Turning Count surveys indicated that the AM Peak hour at the mini-roundabouts was between 0730 and 0830. The results are shown in **Figure 1-4**.

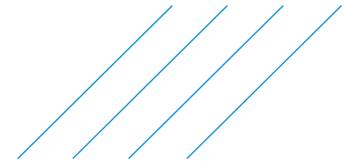
Figure 1-4 Junction Turning Count – AM Peak Hour (0730-0830)



In relation to the traffic flows surveyed during the AM Peak hour (0730-0830):

- The northern mini-roundabout;
 - The highest traffic flow originated from The Square (N) (840 vehicles); and
 - The highest traffic flow movement was The Square (N) to London Road (339 vehicles);
- The southern mini-roundabout;
 - The highest traffic flow originated from The Square (N) (750 vehicles); and
 - The highest traffic flow movement was The Square (E) to The Square (N) (543 vehicles);
- B2131 Haslemere Road / Midhurst Road mini-roundabout;
 - The highest traffic flow originated from The Square (E) (571 vehicles); and
 - The highest traffic flow movement was Haslemere Road to The Square (E) (329 vehicles).

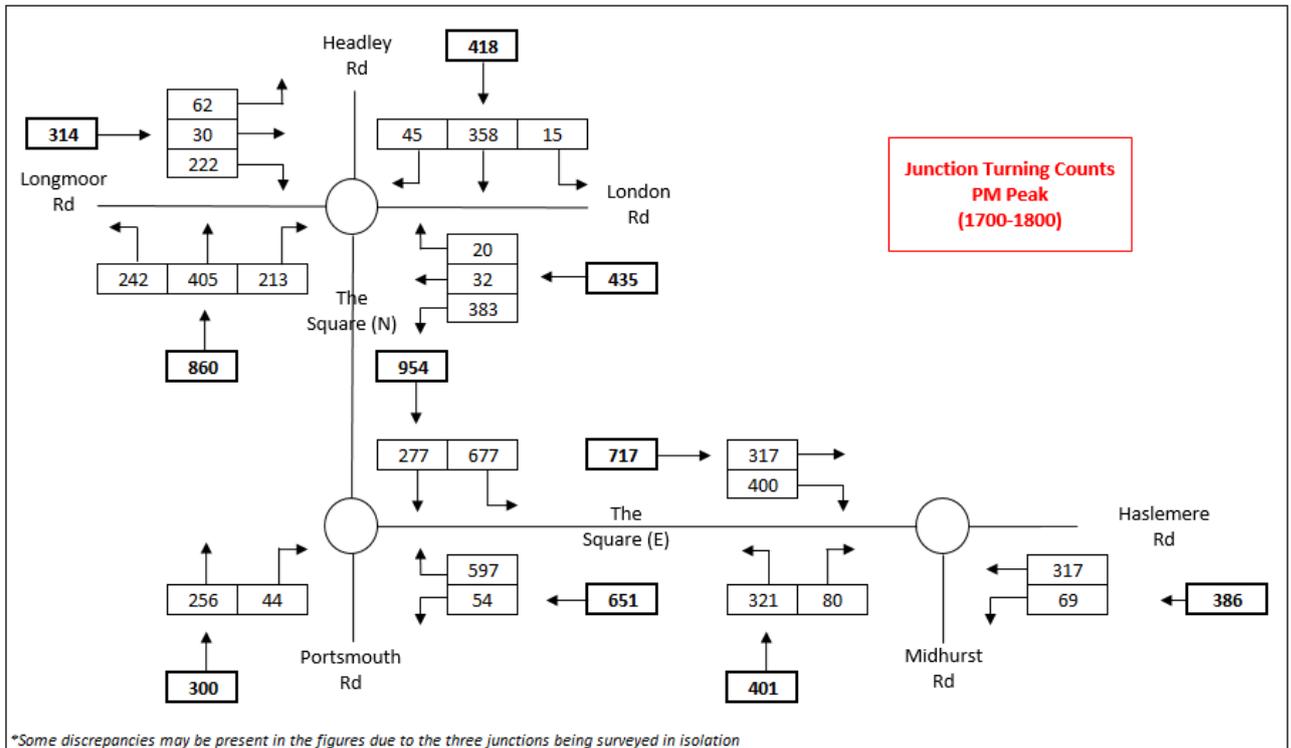
The Junction Turning Count surveys indicated that the PM Peak hour at the mini-roundabouts was between 1700 and 1800.



1.2.4. PM Peak Hour (1700-1800)

The results of the Junction Turning Counts for the PM Peak hour (1700-1800) is shown in **Figure 1-5**.

Figure 1-5 Junction Turning Count – PM Peak Hour (1700-1800)



In relation to the traffic flows surveyed during the PM Peak hour (1700-1800):

- The northern mini-roundabout;
 - The highest traffic flow originated from The Square (N) (860 vehicles); and
 - The highest traffic flow movement was The Square (N) to Headley Road (405 vehicles);
- The southern mini-roundabout;
 - The highest traffic flow originated from The Square (N) (954 vehicles); and
 - The highest traffic flow movement was The Square (N) to The Square (E) (677 vehicles);
- B2131 Haslemere Road / Midhurst Road mini-roundabout;
 - The highest traffic flow originated from The Square (E) (717 vehicles); and
 - The highest traffic flow movement was The Square (E) to Midhurst Road (400 vehicles).

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BRAMSHOTT & LIPHOOK NEIGHBOURHOOD DEVELOPMENT PLAN

RESPONSE TO EHDC's LIPHOOK CONSERVATION AREA CHARACTER APPRAISAL AND MANAGEMENT PLAN – COMMUNITY CONSULTATION – JUNE 2019

Submitted by: Bramshott & Liphook Neighbourhood Development Plan
admin@bramshottandliphookndp.uk
NDP Office, The LMC Office, 2 Ontario Way, Liphook, GU30 7LD

Date: 19th September 2019

Ref: BLNDP/EHDC-DLCA/V.1

INTRODUCTION

The Bramshott and Liphook Neighbourhood Development Plan (BLNDP) have assessed the draft 'Liphook Conservation Area Character Appraisal and Management Plan', its proposed guidance for the resulting Management Plan, and proposed alterations to the Conservation Area boundary for Liphook.

This consultation response draws from comments received from all the NDP Working Parties, and in particular the Heritage and Design Working Party who have assessed the existing Conservation Areas, Listed Buildings, and heritage quality of the Parish of Bramshott and Liphook as part of gathering evidence for proposing policies for the NDP.

The Heritage and Design Policy Theme's vision is 'to rediscover the heritage of the Parish and address issues of aesthetics, in geographical areas such as the village centre and with regard to design'.

We note that several members of the Heritage & Design Working Party are also members of The Bramshott & Liphook Preservation Society, therefore, it is recognised that there will be some common comments between the two consultation responses.

This consultation response also refers to evidence gathered from the public during the past consultation events held by the NDP, including the Visioning Event in July 2017, 3 day Design Forum in November 2017 and the NDP Public Consultation in February 2019, which included a 2 day presentation and 2 week online consultation period.

The below response includes public views from our evidence base, and some detailed clarifications and corrections due to changes that have taken place in the Liphook Conservation Area (CA) since the drafting of the draft Plan.

REVIEW OF THE PROPOSED BOUNDARY CHANGES

The review of the Liphook CA boundary is welcomed. Our evidence base suggests that the public feel that the CA loses cohesion if it is discontinuous and weaves between spaces, especially along key accesses and views within and from outside the CA. This is particularly important when the CA boundary is also on one of the key radial roads, resulting in a loss of clarity where the CA starts and stops, especially where the opposite road frontage differs substantially in style.

This is particularly important regarding the addition of Nos. 50 and 52 Headley Road, which is agreed to be an appropriate addition to the CA, but further strings out the far North CA boundary, which is already the case with Jubilee Terrace in Headley Road being included within the CA although it is visually and physically separated from the core of the CA by the CA frontage gap between this terrace and the Social Club. The inclusions of 6-30 evens on the East side of Headley Road would provide some continuity in the CA frontage, however, noting that 6, 6A and 6B are not of historical importance due to being modern infill development.

The addition of the Social Club into the CA is also agreed as an appropriate addition due to the interesting features and community use.

It is also proposed that there may be some benefit in including no. 3 & 5 Headley Road within the CA as they are modest but attractive inter-war properties that form part of the key approach to The Square. This would allow more control over changes to these properties that are seen in conjunction with the core of the CA along a key view.

Public comments received at NDP events propose that including some of the less desirable frontages that are directly adjacent or surrounded by the CA allows opportunity for improvement of these frontages, and therefore the quality of the CA.

The recommendation to remove the semi-detached and terraced 20th century houses on the North side of Longmoor Road, is understood, but it is proposed that as these houses assist with framing the approach to The Square and are opposite the curtilage of the Royal Anchor, which is a Listed Building, that keeping at least the terrace in the CA would enable a better level of control and potential opportunity to enhance these properties over time, rather than allowing changes to be made under permitted development rights that could negatively impact the appearance of the properties. There are public concerns that the historical status of The Royal Anchor is being

undermined by a lack of consistent maintenance, therefore, it is prudent to also protect its curtilage and setting from negative changes.

There have been comments made that Childerstone Close, which is behind the Social Club and fronting London Road, shouldn't necessarily have every unit on the modern estate road within the CA boundary, noting that Childerstone house itself, built in 1890s, is worth having in the CA, along with the London Road frontage with the long stone boundary wall and mature trees. However, this then undermines the above comments about retaining a strong CA core and not stringing out the CA, which would be the case if no. 50 & 52 Headley Road and the rest of the East side is added into the CA, but part of the Childerstone Estate removed. Therefore, in this respect it is likely best to retain these properties within the CA to protect the CA's core and the interesting traditional long gardens of properties on Headley Road, and the wide spacious estate road and vegetation in Childerstone Close.

The Methodist Church on London Road is supported as an inclusion within the CA, as it assists with framing the entrance to The Square. The path along the side of the small recreational ground behind the Methodist Church should be left in the CA to encourage improvement. The rest of the East side of London Road up to the recreational ground should be considered whether appropriate to include as they set up the entrance to the village, and the strong hedgerow, mature trees and stone entrance building at the recreation ground go some way towards setting the quality for the CA, and it would be detrimental to see these key features removed over time.

The addition of the frontage of The Postal Sorting Office is also agreed as appropriate, as it is part of the grander setting of this attractive building. The stone wall on the opposite side of the road is also of interest.

Public comments have stated that C20th housing/buildings should also be included in the CA to preserve the qualities of good examples of interesting modern buildings and housing estates, and to protect street frontages in the CA and any extension to it. In particular comments have been made about the small collection of older attractive cottages and houses over the railway bridge along Midhurst Road, of which none are listed, nor is the Railway station which is a good example of a traditional rural station and a key feature when arriving by train to Liphook. The Berg estate on Midhurst Road built in 1965 in the grounds of Chiltley Place has also been referred to as a good example of C20th housing, and currently within policy H9 Area of Special Housing Character, which should be retained, or protection increased to preserve the spacious qualities of the modern housing estate. Public comments have included that green space, and the feeling of spaciousness is a key design feature and characteristic of the more modern housing in Liphook, and worthy of protecting to ensure it is not eroded. Whilst these comments have not been fully consulted on by the NDP, and come from various public comments made to the NDP, the NDP acknowledge that Liphook and the parish of Bramshott and Liphook has a variety of different styles of building that make the area interesting and an attractive place to live.

The Heritage & Design Working Party and Bramshott & Liphook Preservation Society have recommended that the Allianz building on Haslemere Road, whilst contemporary and not to everyone's tastes, should be considered for inclusion into the CA as it increases and continues the CA frontage opposite Chiltley Manor, and preserves a more contemporary building and its spacious frontage. Whilst it would also then include a few less attractive properties it then allows more control over their future changes to appearance. The NDP have not received many

comments on this particular building during public consultation events in order to provide a strong for or against its inclusion in the CA.

The Heritage & Design Working Party and Bramshott & Liphook Preservation Society have also recommended that Shipley Court is included in the CA combined with the roadside frontage planting area of Sainsburys on Midhurst Road, as this approach starts to define the quality of the CA area, and whilst the Midhurst Road has a run-down appearance on its run-up to the village centre, it allows more opportunities for improvements to the CA. The Shipley Court is considered by these two sources to be a good model of relaxed village centre small-scale housing development which has not been matched elsewhere in the area and whilst different in style, it defines the area in its own right.

CLARIFICATIONS AND CORRECTIONS FOR THE DRAFT CONSERVATION AREA CHARACTER APPRAISAL AND MANAGEMENT PLAN

Page 5 – Trees are considered an important part of the Liphook CA and this management plan and recommendations should make it clear that all works to trees in Conservation Areas is notifiable to the LPA, and is controllable work, as it very often misunderstood that trees in CA's cannot be worked on unless permission has been granted via a formal application.

Page 7 – the Listed Buildings should be marked on the same map as the Conservation Area boundary for clarity.

Page 9 – We refer to the comments made by The Bramshott and Liphook Preservation Society on the historical spelling of Chiltlee and that there are several different spellings used within road names, and these need to be correct in this CA Appraisal and Management Plan. Ie. Chiltlee refers to the part to the North of the railway line, and Chiltley refers to the South area.

Page 12 – Photographs should be retaken when it isn't bin collection day in the village! The photographs and quality of spaces viewed in the photographs is distracted from by the bins in the photographs.

Page 13 – The important view arrows should be clearer and photographs of these views should be included in the Appraisal for reference for the current appearance for future reference.

Page 14 – Dormers are a recurrent feature in the CA, especially on the more vernacular properties. The Arts and Crafts style is a strong style in the CA, and The Old Rectory 6 Portsmouth Road (Hailie – top right photo) is of significance being designed by a leading local Arts & Crafts Architect Inigo Triggs in 1912.

Page 15 – Chiltlee Manor has been significantly extended over the years compared to the original building;

Page 17 – 10 London Road – the exposed masonry wall in the right photograph shows quality stone masonry which could be of historical interest and should be conserved, with render cut back to where the dressed stone quoins are currently partly visible, to expose this stonework. Important to note that the right photograph is now out of date as No.12 London Road has replaced its commercial frontage.

Page 18 – The middle right photograph is now out of date due to the replacement of the commercial frontage at this property.

Page 19 – The street lighting, whilst sympathetic to the history and character of Liphook, some of the street lights have been located insensitively causing detracting features on the streetscene and appeared to be installed for practicality without consideration on aesthetical appearance.

Referring to the Heritage & Design Working Party and Preservation Society's advice – the cobbled surface at the junction of Longmoor Road and Headley Road mentioned as 'old', was apparently laid in 1977 as part of the A3 'improvement' works through The Square when the Longmoor Road was realigned following the demolition of the Anchor Annexe. The work is of poor quality and condition and is not a characteristic local surface according to the Preservation Society. The 'cobbled' surface to the east of The Square by the telephone kiosk and pillar box is a pavement of ironstone setts or cobbles of local origin, being eroded away due to excavation works for services and not reinstated. The NDP agree that the protection of original cobbles should be considered as important as part of any improvement works to pedestrian movements and crossings around The Square, even if localised to assist with ease of access.

The Heritage & Design Working Party state that the shape of The Square has not changed, the form is defined by the space between the Anchor hotel and The Square's eastern frontage with the Southern end made by Ship House and the flank wall of The Gables Newsagents, where a significant part of its enclosure to the North was lost in 1977 following demolition of the Anchor Annexe. The horse chestnut tree, which was recently lopped and replaced after collapsing, formed the centre-point of the space, and to some extent the northern edge of The Square is re-defined by post 1977 tree planting. This is visible in the historical mapping of this area.

The space is currently hard to 'read' as a Square due to the construction of the footpath, bus stop and lay-bys, low level pedestrian bollards etc. all which divide the Royal Anchor forecourt from the eastern part of the space, though the forecourt is highly used by pedestrians as a thoroughfare linked with the pedestrian crossing, retaining practical continued use of the area as part of The Square in this regard to facilitate the movement of people.

Page 22 – Buildings listed as 'potential for enhancement' should have the key overriding characteristic feature which reduces its contribution to be stated to ease with future proposals to improve buildings in the CA, rather than expecting owners to second guess which features these may be where it is not obvious.

Page 24 – the replacement of traditional timber windows with uPVC in the CA has often taken place without planning permission granted for the change.

Page 25 – The flat-roof infill is noted as proposed potential for improvement with the NDP, with the introduction of a first floor with pitched roof encouraged for this particular property.

The bottom photograph of the Arts and Craft building is now out of date as the signage has been removed.

Page 26 – it is agreed that modern development that has taken place within the original curtilage of a historic building should be kept within the CA to retain a cohesive CA boundary and to recognise the importance of historical plots.

Page 30 – reference to New Development and that potential for new development within the CA is generally limited to the replacement of mid-late 20th century buildings which do not positively contribute to its character – refer to comments above on the public comments of the importance to protect some 20th century buildings that are of architectural interest.

Page 31 – Recommendation 4 – ‘Buildings, features and spaces identified as making a positive contribution to the Conservation area should be afforded protection against harmful change’ – it is suggested that it is added that ‘improvements proposed to thoroughfares to improve pedestrian and vehicle flow that are otherwise consistent with this CA policy will be supported where they enhance the visual and physical nature of the public realm of the CA’.

Recommendation 9 – ‘Liphook’s distinctive and historical configuration of roads should be protected’ and it is suggested to add that ‘improvements proposed to thoroughfares to improve pedestrian and vehicle flow that are otherwise consistent with this CA policy will be supported where they enhance the visual and physical nature of the public realm of the CA’.

It is important to note that the comments received to the NDP’s Public Consultation refer strongly to the need to reduce the impact of traffic on the Parish as a whole and the negative impact it has on the CA. Of course passing traffic is noted as needed to encourage natural interaction and use of facilities, but the weight of traffic and speed it passes through the village CA centre has been a key common comment of the public in our past consultation events. This needs to be managed as part of retaining the historical features of The Square and its historical road configuration. There are historical maps showing how the roads use to flow in The Square which are significantly different to the current collection of roundabouts.

ADDITIONAL COMMENTS FROM PREVIOUS NDP CONSULTATION EVENTS

As part of the Bramshott and Liphook Neighbourhood Development Plan Consultation Event in February 2019, the NDP presented their draft planning policies to the public for comments. This included 4 Heritage and Design policies that covered the Parish as a whole. The comments received are considered important to put forward in this Conservation Area Consultation, as there were many comments made that specifically refer to the Liphook Conservation Area.

Draft Policy HD1 – Rediscover The Square Conservation Area

- There were many comments made about the impact of vehicular traffic on The Square and the negative impact it is having on the CA, including impact on sense of place, ability to dwell, pollution on health and building fabric, vehicular presence over space presence, discourages notion to dwell, not supported by the lack of wider pavements with planting and places to sit and watch etc.:
 - o Resurface roads with a sympathetic surface inline with the heritage qualities;
 - o Mixed views on the introduction of a Pelican Crossing and whether this would reduce traffic and therefore pollution and improve the quality of place in The Square;
 - o The need to prioritise pedestrian safety over the cars and widen the pavements not just for safety reasons but to improve the appearance and enjoyment of The Square, making it safer and more attractive for people to stop and look, or stop and use the facilities, rather than rush through and not stop due to the pollution, noise and congestion of traffic;
 - o General need to retain the same number and improve all crossings generally to improve safety, appearance and attraction for people to walk into the CA, and spend time enjoying the quality of the CA;
 - o Benches behind shops/ Green Dragon and a paved area with planting

- ie. encourage 'dwelling', which in turn encourages owners of buildings to improve their properties to attract people to use their facilities;

Draft Policy HD2 – Enhance shop frontages and design

- improve shop signage to ensure it fits with the village;
- improve the colour choices for shop frontages to harmonious rather than distinctively contrast;
- Reference made to the quality of shop frontages in Haslemere as a good example;

Draft Policy HD3 – Rationalise and review street furniture

- Reduce excessive signage;
- Good quality benches;
- Metal planters over plastic;
- 'Courtesy' crossings should be made more attractive to encourage use and being noticed;
- Notice boards not of good quality

Draft Policy HD4 – Rediscover the heritage of the Parish

- Preserve buildings of distinction, ie. Library, Methodist Church, Clock Tower on Chitley Lane, Milestone
- Take pride in the Heritage Centre (in the Liphook Millenium Centre) and provide literature to visitors on noticeboards;

General other comments made regarding Heritage and Design during the NDP February 2019 consultation included:

- Retain ancient hedgerow on land north of Bramshott A3, protect ancient Oak tree on Church Road;
- Protect local landscape, trees, particularly on the Berg estate, where despite TPO's trees are cut down for development of individual properties
- Preservation of Devils Land to prohibit traveller site damaging ancient hedgerows;
- Signage into the village should be updated to make it feel like an 'entrance';
- Unsightly abandoned properties by Hiscox and London Road should be redeveloped;

The Access and Movement Working Party's objective is to ensure continued access throughout the Parish with a reduction in the negative impacts associated with high traffic volumes and speeds. The research and evidence gathered to date sets out a particular challenge to address the existing congestion at the 3 mini-roundabouts at The Square, Liphook, and manage the flow of traffic from the 6 arterial roads which converge on The Square.

It is the vision of the B&L NDP that our community becomes less reliant on car transport, and the NDP is seeking ways of promoting the safe and connected use of active modes of transport across our Parish, of which pedestrian and bicycle movements through the CA are a key part of this vision.

The evidence we have collected from all three past public consultation events, that has been cumulatively emphasised through each sequential event, demonstrates that the community of Bramshott and Liphook Parish require any future developments within the Parish provide most importantly community benefits, open space, improved infrastructure and mitigation measures

to improve the traffic congestion and air quality in the Conservation Area of The Square, with the improvement of sustainable alternative modes of transport as the transport method of choice, which is influenced by improving access and the potential to 'dwell' and move safely and with purposes within the core of the CA.

It is important to note that the BLNDP is not anti-development. The BLNDP understands that places grow or decline but nothing stays the same, but it is important that development is located in the correct places and with suitable architectural styles and design so to have a positive impact on place and community, both physically and psychologically, and development of any level of intervention should not have a negative impact on the existing positive quality of the CA in particular.

CONCLUSION:

The NDP have considered the comments from all parishioners received through the NDP consultation events, and taken the most collective comments forward as the visions for the Parish.

A key vision of the public noted through consultation responses is to ensure the parish is linked with suitable and safe access routes, without relying on use of private cars and to promote sustainable development where the community utilising walking and cycling. This has a direct relationship to the treatment of the CA, as surfacing materials, pavements, boundary treatments and landscaping all impact on movement and access around a centre. Such as retaining existing cobbles of historical interest should be promoted, but also noting that this type of surface finish also has negative impact on access for wheelchair users, pushchairs and cyclists who will inevitably prefer different surface finishes that are less difficult to negotiate. Therefore, care is required to ensure that there is suitable balance of historical features but not assuming that these should be replicated across the CA without consideration of practical and suitable access routes for all types of users.

The cumulative conclusion of the evidence base to date is that any development that happens within the Parish of Bramshott and Liphook, which includes development within the Liphook Conservation Area, the right infrastructure, facilities and services have to be in place and improved as part of any proposals, not only to ensure these meet the current needs, but also the needs of the proposed development, whilst not negatively impacting the existing community and Conservation Area of this Parish. This translates to the location and positioning of new or replacement development and any changes to pavements and roads, and also the design and material finishes of new buildings and spaces and connections with the existing thoroughfare routes, and the importance that these developments need to positively contribute to the Conservation Area, and the surrounding areas leading up to the CA.

It is clear from the public comments made to the NDP during our past consultation events that the protection of the quality of the Liphook CA is of high importance, to ensure that the CA is not eroded in quality or character by unmonitored changes, or by not properly protecting buildings and spaces of special interest, in order to retain and further promote a Conservation Area that has a distinctive sense of place, and encourages people to spend time and 'dwell' in this characteristic feature of the parish of Bramshott and Liphook.



BRAMSHOTT & LIPHOOK NEIGHBOURHOOD DEVELOPMENT PLAN

RESPONSE TO EHDC's LARGE DEVELOPMENT SITES CONSULTATION

– OCTOBER 2019

Organisation: Bramshott & Liphook Neighbourhood Development Plan
Email: admin@bramshottandliphookndp.uk
Address: NDP Office, The LMC Office, 2 Ontario Way, Liphook, GU30 7LD
Date: 14th October 2019
Ref: BLNDP/EHDC-LDSC/V.1

INTRODUCTION

The Bramshott and Liphook Neighbourhood Development Plan (BLNDP) have assessed the documentation submitted for the EHDC Large Development Sites Consultation and provide the following responses to the questionnaire questions.

This consultation response draws from comments received from all the NDP Working Parties who are researching the 7 themes for our NDP and refers to evidence gathered from the public during the past consultation events held by the NDP, including the Visioning Event in July 2017, 3 day Design Forum in November 2017 and the NDP Public Consultation in February 2019, which included a 2 day presentation and 2 week online consultation period.

The February 2019 Public Consultation included draft planning policies and vision and the communities response to these policies and the vision for the Parish. Copies of the documentation are attached for reference, including the Atkins Report that sets out evidence on traffic issues in Liphook. We also attach a copy of our response to EHDC's Liphook Conservation Area Character Appraisal and Management Plan which sets out comments to this consultation, which are important

to note as in particular the Land South East of Liphook Large Development Site significantly impacts the Conservation Area due to increase in traffic movements in this centre.

The evidence we have collected from all three events, that has been cumulatively emphasised through each sequential event, demonstrates that the community of Bramshott and Liphook Parish require any future developments within the Parish provide most importantly community benefits such as more recreation and open space (documented deficiency of open and recreation space within the Parish), improved infrastructure, mitigation measures to improve the traffic congestion and air quality in the conservation area of The Square in Liphook, the improvement of sustainable alternative modes of transport as the transport method of choice, better access to open countryside, protecting and developing our access to the South Downs National Park (see BLNDP Interim Report March 2018).

The community's visions for their Parish are outlined in our Neighbourhood Development Plan Policy Themes, as set out below. These visions are formulated from the evidence gathered at the Visioning Event and the Design Forum from the community.

- Housing Policy Theme's vision:
 - o 'Ensure new housing developments contributes to the identified local housing needs of the Parish, whilst having regard to affordability, design and sustainability. Any new development must respect our local environment, natural and built, and have a positive impact on the Parish';
- Access & Movement Policy Theme's vision:
 - o 'Improving the circulation of people and goods, around and through the Parish';
- Community Policy Theme's vision:
 - o 'To support an economically vibrant, mixed use centre, and to provide facilities for all generations including those living and working in the Parish';
- Sports and Recreation Policy Theme's vision:
 - o 'Improvement of existing facilities and planning for the future servicing of additional sports and recreation facilities for the community';
- Public Services Policy Theme's vision:
 - o 'To endeavour to provide better access to community healthcare, education and to ensure high standards of environmental sustainability throughout the Parish';
- Employment Policy Theme's vision:
 - o 'Support and promote a vibrant employment base within the Parish. Safeguard existing employment land and identifying new sites and opportunities, along with small business creation, and promote stronger education/ workplace links';
- Heritage and Design Policy Theme's vision:
 - o 'To rediscover the heritage of the Parish and address issues of aesthetics, in geographical areas such as the village centre and with regard to design';

It is important to note that the BLNDP is not anti-development. The BLNDP understands that places grow or decline but nothing stays the same, but it is important that development is located in the correct places to have a positive impact on place and community, both physically and psychologically, and development should not have a negative impact.

Reference is made to the Bramshott & Liphook NDP's consultation response to EHDC's Draft Local Plan Regulation 18 Consultation, issued on 19th March 2019.

Please note that this response is mainly focussed around the site proposed within Liphook, and the nearby site proposed in Bordon due to the evidence base that has been collected over the last 2 years specifically regarding this parish. The response also makes positive and negative comments on the other sites within this consultation.

The below response includes public views from our evidence base, and some detailed clarifications and corrections.

EMAIL ISSUED TO EHDC ON 09/09/2019 REGARDING INCORRECT INFORMATION ON PRESENTATION DOCUMENTATION

We note that we emailed EHDC on 9th September 2019 regarding the misleading information set out by the developers/promoters of the 'Land South East of Liphook' in their submitted and presentation documentation for your Large Development Sites Consultation.

These concerns were initially raised by the members of the Steering Group that attended the Consultation event on 2nd September 2019, and their discussions with the promoters during the event who implied that the NDP were positively working with and having meetings with them.

In particular concerns focus on the misleading information and implied working relationships set out in the Large Development Site Information Pack on pages 5, 22 and 23.

This information pack, and how the promoters discussed their proposals with the Steering Group members, implies that this consortium have established a positive working relationship with the Bramshott & Liphook NDP and had meetings with us as a group separate to the consultation events that we have held. In addition they have stated the wrong date for our issued Interim Report.

We make it absolutely clear that the Bramshott and Liphook Neighbourhood Development Plan have not held any separate meetings with any of the original promoters or the current consortium members of this proposed large development site.

The only discussions had with these promoters, as with all the other site promoters within our parish, is acknowledging receipt of their submitted documentation to us by email, and conversations during the Design Forum held in November 2017, during which all developers who submitted information for this event had equal opportunities to present to us, and the public, their proposals and to take part in a masterplanning and discussion session that took place during this 3 day event.

The Bramshott & Liphook NDP, and the Steering Group, have not engaged separately with this consortium nor have we provided them with formal consultation feedback on their proposals.

The email requested that the incorrect and misleading information be rectified immediately both online and in the event presentations so that members of the public reading the consultation documentation are not misled, and do not obtain the wrong impression of our NDP. We note that we have received no response to date, nor was the presentation material updated to address the above concerns.

LAND SOUTH EAST OF LIPHOOK CONSULTATION QUESTIONS RESPONSE:

* Reference is made to the Bramshott & Liphook NDP's consultation response to EHDC's Draft Local Plan Regulation 18 Consultation, issued on 19th March 2019 that sets out more details regarding part of this proposed development site.

1. Do you have any comments on the proposed uses?

- Proposed uses not suited to this location due to the actual travel distances to the nearest key facilities, including the local schools, 2 existing local centres with their retail, cafes etc. A third local centre within Liphook will not help the current situation where there is already a separation of key services areas, and the use of the car to travel around the village to access different services in the two centres.
 - o This would make the development a commuter facility rather than part of the existing community, made clear by the developers reference to access to the station and A3. There is no recognition in the proposals of the changing patterns of work or the nature of work for many in the Parish, no encouragement for example work/home spaces, or co-working opportunities or small studio spaces for startups, and if in this location would be segregated and not helping the economic health;
- Proposed uses will increase use of the car due to location of other key services required, meaning increases of vehicles using 3 key crossing points for the railway line that are currently dangerous and inappropriate for existing levels of traffic;
- Existing drainage problems for both surface and foul drainage which impacts housing developments;
- Previous comments from the local schools have stated that a satellite or new primary school is not suitable nor supported in this location. Comments from the public have suggested that a new primary school will cause an East/West side status due to locations of schools;
 - o Evidence gathered and published at the NDP Interim Event in February 2019 by Public Services Working Group (from the Federation of Liphook Junior and Infant Schools and HCC Children's Services) make it clear that the Federation has sufficient places for all children who apply on time at Year R and Year 3 (the main admissions rounds for the Schools) who live in catchment. Out of catchment children are accepted at these times as well and there is sufficient projected capacity for any larger development at the Federation. If need for places did arise, HCC will look to expand capacity at existing sites should demand outstrip supply first as one form standalone schools are more financially vulnerable and the Federation has plans and capacity to expand if needed. The school places driven by the potential development are insufficient to support a one form entry school, and thus will result in additional traffic congestion at peak times as families drive to the new proposed school.
 - o The capital costs of a new school are around £2 million, it is disappointing that the developers offer a community asset that the public evidence shows is not needed, thus ensuring that they do not need to factor in the funding in their actual budget for the project. There are other community projects that capital sum could be used for to produce a viable development elsewhere in the parish that enhances and brings sustainability to the parish from such a larger development and could have the potential to ensure the proposed development becomes part of the parish, rather than the current proposals location, facilities and access points which indicate its design to be a separate suburb on the edge of the parish it is situated within and which it has been designed to have no part to play in or contribute to bring to that

parish other than through negative effects of adding to peak time school journeys in particular from one end of the parish to the other (partly because of distance, and partly because parents do not feel it is safe for children to walk or cycle to school along the pathways and routes available at peak times).

- Allotments allocated to inappropriate locations on the site;
- Football pitch located at the most difficult location for visitors by foot and car – lack of connectivity for most of the parish to the North of the railway line = likely increases vehicle movements and car parking issues due to use of car to access site;
 - o It is noted that one of the grounds on which Chichester DC agreed to planning for the new astro and sports facilities at Highfield School (owned directly by a member of the consortium of developers) currently being built, was that the facilities would be available to local clubs, including use by Haslemere and Chichester hockey clubs and Liphook football club. The lighting consists of eight 15m supports each for 7 light units, which seems out of place for the SDNP Dark Skies Policy.
- Housing density higher than adjacent Area of Special Housing Character;
- Employment location creates a third local centre, issues for access and deliveries once in operation due to road network and lack of ease of access from the A3.
- Mixed use development inappropriate in this location due to access – multiple uses not suited to this area as it is segregated and creates its own community even though it is on the fringe of Liphook due to the railway line restricting access;
- The SANGs is far to walk to from the majority of the development at 1.15miles, and already accessible to the public, not considered to be a welcoming area, and likely people will drive to access the SANGs land due to the dangerous roads and the SANGs location;
- No proposals for footpaths to improve the main access ‘lanes’ for the development, it is a rural area at present with a lack of connectivity infrastructure.
- Bramshott and Liphook is not a commuter settlement, it is a community and this should be respected and nurtured – this site focuses on the train station as the centre of the area, which it is not, therefore, the proposals that it is a sustainable location does not apply to the impact the proposals will have on vehicular access and the community and social cohesion.
- The allocation of this site would be against EHDC DLP Policy S4, Health and wellbeing. Policy S4 states that development proposals should take into account and support positive health and wellbeing outcomes by ‘a) contributing to a high quality, attractive and safe public realm to encourage social interaction and facilitate movement on foot and cycle; b) .. the right mix of homes to meet people’s needs and in the right location; ... f) ensuring high levels of residential amenity; g) providing opportunities for formal and informal physical activity, recreation and play...’. It states to implement the policy that development can support health lifestyles by providing quality open spaces, particularly in areas identified as being deficient, for sport, recreation and play whilst improving links to existing spaces and sports facilities.
- The density of houses per ha is appropriate for part of the site which is adjacent to an existing house site which is classed as a “Low Density Neighbourhood” in the EDHC DLP. The threshold in the EHDC DLP as set out in Policy DM30, Residential design in low-density neighbourhoods, is 15 homes per hectare, and the existing adjacent development has an approximate density of 8 homes per hectare. The proposed density is 35-40 dwellings per ha;
- Actual travel distances (not as the bird flies) from the Chitley Farm part of the site are approximately as follows:
 - o 2.5km to Liphook Infants & Junior School;

- 2.0km to Bohunt School & Sixth Form
- 2.9km to Liphook A3 junction
- 1.7km to Village Centre facilities;
- 1.5km to Sainsburys Store;
- 2.1km to Co-Op/Post Office;
- 1.1km to Railway Station;
- 1.5k to Bus Stop (no.13 bus);
- 1.2km to Radford Park
 - All measurements taken from an online measuring tool using the most convenient/direct walking route on pavements.
 - It is the vision of the B&L NDP that our community becomes less reliant on car transport, and this proposed site would not achieve this due to the distances to walk to main services.
- Proposed development will increase the developed area of Liphook village by approximately 20%. There is no reflection or evidence in the developer's proposals that this exponential increase in the physical, environmental and social infrastructure and no recognition of the impact that such an increase will have on the parish, whether positive or negative.
- The developers have not made any attempt in their proposals to address or have regard to the detailed evidence prepared by the NDP Working Parties and published on their website and in an event in February 2019, and have not reviewed the comments and concerns raised by local residents in response to these publications, again available on the website. This lack of engagement with the NDP material conflicts with the developer's stated aim of working with the NDP.
- The developers have indicated that the development would open up access for visitors and residents into the SDNP area that borders the development, the current proposals make no reference to how this is achieved or delivered, apart from the potential SANGs which is already accessible, or whether the developers have discussed this community benefit with the SDNPA especially following publication of the SDNPA Local Plan.

2. What infrastructure is required to support the proposal and when? This could be on or off-site provision

- Access to the A3 is only possible via the restricted railway bridge adjacent to the station or by Haslemere Road. This has high potential to cause major traffic congestion and as vehicles accessing the site become larger, whether from construction, delivery to residents, and maintenance vehicles or from larger domestic vehicles, the narrow railway bridges and access points to those bridges close to buildings and walls are already unable to manage to ensure a flow of traffic whenever a larger delivery lorry, school coach (to and from Churchers Junior School, or Highfield and Brookham Schools), or transit vans needed to make progress between Station Road and the junction of the Berg Estate. The recent Atkins Report (commissioned by EHDC and HCC) concluded that the congestion is local traffic travelling from East to West (to access the local primary and secondary schools) which is exacerbated by Bohunt School Pupils crossing the road in the village centre, recently increase by additional pupils using the railway station.
- Lack of good access to the A3 and other roads to the North of the railway line during peak times due to the existing heavy traffic moving East to West in the village centre, creating slow moving traffic in the centre – refer to Atkins Report – Liphook Phase II Transport Feasibility Study July 2018. This states that the average journey time of strategic traffic travelling

between the A3 and Haslemere Road is under 13 minutes at peak time AM and PM, excluding school traffic. Including school traffic this significantly increases to up to 28 minutes for the same route in the PM.

- This report sets out that the mini-roundabouts in The Square are congested, but none of the proposed strategic mitigation options would appropriately address the issue due to the movement of local traffic causing the main traffic movements in The Square, and would mainly potentially reassigning traffic along inappropriate local roads. Therefore, it is clear that any new housing needs to be located to reduce the reliance on the car at peak times, in particular to access the existing local schools.
- The report concludes that further assessment is required 'on the double mini-roundabouts at The Square to understand the potential relief that can be attributable to removing traffic from the network from the implementation of sustainable transport options / initiatives (ie. school / workplace travel planning promoting cycling / walking / public transport and discouraging driving).
 - This proposed site contradicts the proposed mitigation methods set out in the report, and would appear to add to the current problems due to the reliance on the car as the local services are not within a short walking distance.
- The Atkins Report did not look at Highfield Lane, therefore the volume of traffic along Highfield Lane and through the village via the narrow bridge at Midhurst Road to access Liphook along this route instead of Haslemere Road, is unknown;
- We note that Hampshire Highways are carrying out further surveys into the pedestrian and vehicle movements in the Parish, in particular focussing on the moving of school children with the aim to reduce the impact on the centre of Liphook. They have been consulting with the Parish Council and District Councillors.
- Widening of railway bridges and access and visibility splays under the Eastern side of the railway track to allow two vehicles to be able to pass each other at the same time in these key 'pinch' locations, this needs to be carried out prior to the development taking place;
- Introduction of missing footpath links on Midhurst Road to link to the railway bridge – currently unsafe for pedestrians to walk from Chitley Lane through to the Station Road area due to no continuous pavement;
- Introduction of footpaths to link proposed site to the proposed SANGs land – currently no footpaths and on a road that is outside of EHDC;
 - The NDP Feb 2019 event gave evidence regarding concerns about pedestrians crossings on the Midhurst Road and the danger posed to pedestrians from faster vehicles and unclear lines of sight. The Midhurst Road does not have a continuous footway on the Eastern side from Highfield Lane. It is not clear that the developers would have control over the necessary land to develop a sensible footpath route from the development to Midhurst Road.
- Improvements to all existing vehicular roads and 'T' junctions by the site to allow two cars to pass safely, reduction of speeds of vehicles, and introduction of footpaths as Highfield Road and Haslemere Road South of the railway are unsuitable for pedestrians;
- Improvements of junction between Highfield Lane and Haslemere Road, which has a blind corner – the proposed additional vehicular access onto Haslemere Road needs to be investigated into safety of this access due to the two blind corners within short distances of this proposed junction;

- Improvements to existing 'T' junctions that are difficult to use at present, especially due to poor visibility splays due to road alignment and width.
- Bus services as existing are minimal at one bus service no.13 which runs through the centre of the village and would not service this development. The local service (no250) only runs 3 mornings non-peak and is under threat of withdrawal. It is unlikely to still be running if this development were to proceed, and be of no use as a commuter or school bus due to its route. It needs to be researched whether the bus would be able to access the site, and whether the route could be altered to service this site to improve sustainability.
- Increase in capacity of the foul utilities, the local foul is already suffering on the Midhurst Road sewage network, and the Lowsley Farm development proposed foul sewage attenuation scheme is a recent example that foul utility services are key in development, especially as the scheme failed and caused issues for the new residents and problems continue to arise;
 - o The Public Services Working Group's evidence gathered shows that whilst current foul water drainage infrastructure is sufficient for the current size of the parish, it is not likely to be sufficient to carry an increase of approximately 20%, the solution of using onsite cess pits to store foul water before controlled release to the local sewage network has not been effective for Lowsley Farm.
 - o In addition the lower end of the site near to Haslemere Road is liable to flood around and near the railway bridge. Whilst improvement works have been carried out there, there is a physical limit to the effect this can have as more heavy downpours become a regular feature of weather patterns.
- GP surgeries are as existing physically constrained in the number of patients and services that they can offer to existing residents, due to the nature of their buildings. Commissioners of health services, including GP services are reviewing the services offered and the way in which they are offered during this year, and exploring innovative and new ways of providing health care, which will require additional infrastructure, not accounted for in these proposals.
- ALL OF THE ABOVE INFRASTRUCTURE IMPROVEMENTS NEED TO TAKE PLACE PRIOR TO THE COMMENCEMENT OF THE PROPOSED DEVELOPMENT SHOULD IT BE ALLOCATED AS A SITE.
- SANGs should be on site to encourage its use and to detract people away from the SPA, which is on the opposite side of the development – ie. the SANGs is not between the development and the existing SPA, which already has good walking links to the SPA once on Haslemere Road.

3. Do you know of any other constraints to developing the site?

- Very close proximity to the SDNP which is on the other side of Highfield Lane and the impact of the proposals on Dark Night Skies due to lighting for roads and houses which is in conflict with the planning policies, additional traffic on a rural road adjacent to the SDNP, bring of development up to the edge of the SDNP (negative due to the lack of sustainability of the site's location compared to the heart of the service centre);
- Impact of density and amount of development on the views in and out of the SDNP, and visual impact of its setting. The views to the natural woodland in this location are longstanding and serve several cross county long distance walking routes and bridleways. The views up towards the natural asset that draws some visitors to the parish to walk towards Lynchmere on the Serpent Trail or down towards the Shipwrights Way will be irremediably affected, as well views from the higher land back towards the parish from SDNP land.

- Chiltley Lane is a narrow unlined sunken rural lane with a difficult, part blind junction onto Midhurst Road, not suitable for increased traffic, and limited scope to increase road width and create footpaths due to housing both sides and nature of area being an area of Special Housing Character;
 - SANGs land is in the SDNP and crosses two district boundaries as well;
 - Proposed Haslemere Road access point is between 2 blind corners and a tight access under the railway bridge that currently cannot accommodate 2 large vehicles passing;
 - Devils Lane is a rural sunken lane with a narrow bridge over the railway, not suitable for 2 cars passing. This restricts access to the site, and even if the bridge was controlled with traffic lights or widened, the junction onto Haslemere Road from Devils Lane is blind to the East due to the brow of the hill;
 - Sussex Border Path runs to the South of the Site and impacted in appearance by the proposals, and increased traffic impacting the path;
 - Access from Willow Gardens should not have an access to the whole development as it will increase traffic and change the nature of the Area of Special Housing Character, which remains a protected housing area under the emerging EHDC Local Plan. Using Willow Gardens as a third access point would be in conflict with EHDC Draft Local Plan policies S29, DM30 and DM5.
 - Lack of suitable points for another pedestrian bridge across the railway to help connect the site, due to lack of access points on North side plus financial costs;
 - Near to Ancient Woodland, that would potentially be disturbed by increases in traffic and people movements and additional night time lights;
 - Parts of the site are known to flood and suffers from surface water flooding as existing as greenfields – surface water issues – see Appendix A.
 - Setting of Listed Buildings and views from afar across fields affected by proposed scheme; Listed Building on Chiltley Lane has its setting significantly changed by the proposals;
 - This site is highly constrained with approximately only 1/3 of the whole Parish not impacted by environmental or Conservation Area constraints;
 - The current land is mainly mixed use farmland and supports a diversity of ecosystem and natural wildlife that will be displaced by the proposals, there is no reference to recognising the widely recognised vital role that farmland plays in the natural living landscape in the South East of England.
 - The B&L NDP's Draft Policy HD1 – Rediscover The Square Conservation Area, during the February 2019 NDP consultation received many comments about the impact of vehicular traffic on The Square and the negative impact it is having on the CA, including impact on sense of place, ability to dwell, pollution on health and building fabric, vehicular presence over space presence, discourages notion to dwell, not supported by the lack of wider pavements with planting and places to sit and watch etc., this proposed development and use of the facilities on the existing Local Service Centre, due to the distance to the key services and access to the A3, is likely to increase traffic movements through The Square in conflict with the NDP's draft policy and the EHDC Liphook Conservation Area Appraisal.
1. Current vehicle congestion and associated poor air quality in the centre of Liphook is one of the biggest concerns for residents, workers and visitors of all ages. Road congestion is seen

by the government as a social, economic and environmental burden¹ and even short term exposure to poor air quality has adverse health effects² The new development would add to these issues. The current use of informal link roads and traffic calming systems are not addressing the route cause.

2. Local people have said that they want more opportunities for active travel however additional traffic would add to the already perceived high risk of accidents and continue to act as a barrier. Walking and cycling has multiple health, economic and environmental benefits and is the national policy for travel. However, in Liphook there is little or no room for segregation or shared footway / cycleway provision and to progress this approach unless traffic is reduced. A new development would require a full travel survey and potential significant and costly infrastructure change.
3. Spatial Planning for Health³ guidance shows that active travel is optimal in dense well connected streets with safe and efficient infrastructure. The proposed new site in Liphook is at a corner tail end of the parish and is south of the railway that divides the south of the village. The site has particularly poor connectivity to the village facilities and there is a risk that residents will not choose active travel methods for getting around the village. Road routes are old, already burdened with traffic and take it directly through the centre of the village adding to the congestion, safety concerns and poor air quality.
4. As well as reducing active travel, people in these less well connected areas may be at risk of isolation, loneliness and associate mental health and other health issues⁴. Liphook already has an area of the village with higher than the county average⁵ It is probably that people in this new site would be at risk.

4. What opportunities and/or benefits do you think the proposal could bring.

- Apart from helping achieve housing numbers, only financial gain for the developers, who have not listened to the concerns of the community raised during the Design Forum consultation.

5. What are the cross-boundary considerations and the potential implications? How can they be overcome?

- Proposed site is within at minimum 3 Local Planning Authorities and district areas – EHDC, SDNPA, and West Sussex Council/Chichester District Council, including the key roads to service the site, with potential implications that the proposed infrastructure improvements required will not happen due to different LPAs/District Councils.
- Proposed SANGs land is in the SDNPA and crosses District boundaries, potentially making it difficult to obtain and implement infrastructure improvements for footpaths, SANGs car park access etc. Also more difficult to control/enforcement on land not within the same LPA as main site.

¹ Cabinet office (2009) The wider costs of transport in English urban areas, London: Cabinet Office, Strategy Unit

² DEFRA, PHE, LGA (2017) Air Quality: A briefing for directors of public health

³ PHE (2017) Spatial planning for health: an evidence resource for planning and designing healthier places

⁴ PHE (2015) Local action on health inequalities: Reducing social isolation across the lifecourse

⁵ Hampshire County Council (2016) Social isolation and loneliness in Hampshire, a health needs assessment

- Part of site is within the SDNP which is the area for water and play area – community facilities that may not come forward due to another LPA being in control of enforcement action (very badly shown on the proposals maps!).
- Main access points are within different district areas, and lead onto roads not within EHDC, potential difficulties obtaining consents, implementing proposals, controlling improvements to infrastructure required.

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

- Lack of suitable infrastructure in place for both transport, existing traffic issues and foul drainage utilities. The existing traffic and vehicular access issues in Liphook need to be addressed and dealt with first prior to any further development that is not centrally located to the actual main centre of Liphook. The train station is not the centre of this village. The village centre is where as existing 5 roads converge onto a series of mini roundabouts.
 - o If the current traffic issues in the centre cannot be addressed prior to commencing works if this site is allocated, then the development shouldn't take place.
- Lack of capacity of the existing utility services;

WHITEHILL & BORDON CONSULTATION QUESTIONS RESPONSE:

1. Do you have any comments on the proposed uses?

- Proposed uses supplement the existing approved development in this area and help further expand an existing 'newly envisaged town';
- The proposed housing and much SANGs land helps support the existing, proposed and additionally proposed economic provisions and facilities;
- The proposed uses naturally supplement and extend this revitalised town centre;
- Positive as the SANGs are mainly on the site and not physically separated;

2. What infrastructure is required to support the proposal and when? This could be on or off-site provision

- The key road infrastructure has already been constructed, which would service the majority of this new proposed extensions;
- Already has immediate access to the new A325 relief road.
- The foul sewage and other utilities appear to have already been upgraded to address the current developments being constructed here;
- The Atkins Report – Liphook Phase II Transport Feasibility Study Report July 2018, states that the majority of vehicles entering and exiting Liphook during the AM and PM peak was recorded travelling in the AM, entering Liphook from Headley Road, and exiting Liphook from London Road (and the A3), and in the PM, most vehicles entered Liphook from London Road and the A3, and most vehicles exited Liphook from Headley Road (page 19). These ANPR survey data does not clearly define why the main traffic appears to come from the North into Liphook, but the Whitehill & Bordon site is located along this main road into Liphook. It is highly advised that further studies are carried out to ascertain whether the high volume of traffic are due to the Bordon developments or due to use of this road for access to the A3 by the villages in between.

3. Do you know of any other constraints to developing the site?

- SPAs and SINCs in close proximity, but the proposed extensions to the already approved development appear to have accounted for this through no development within the 400m buffers of the SPAs & SINCs, and the creation of the buffers as SANGs to help create open space;
- Constraint could be how would people be stopped from moving from the SANGs directly into the SPAs/SINCs that are adjacent to the SANGs? Which is the whole point of the SANGs to stop people walking/using the SPAs.

4. What opportunities and/or benefits do you think the proposal could bring.

- Extends and supplements an existing proposed development, bringing more people to help support the new centre, which should make the centre more viable;
- This location has already been carefully designed to be a sustainable town;
- Uses mainly brownfield land, and also creates a large amount of SANGs land that is accessible to the public and helps to create and retain buffer zones with the existing SPAs and SINCs.
- Provides more population for the new employment centres and live/work units etc., and scope for people to see the new employment opportunities on the 'door step'.
- This one site could encompass all the required housing numbers outstanding in the EHDC Local Plan.

5. What are the cross-boundary considerations and the potential implications? How can they be overcome?

No comments.

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No comments.

CHAWTON PARK CONSULTATION QUESTIONS RESPONSE:

1. Do you have any comments on the proposed uses?

- Could encompass all the outstanding housing number in the local plan.

2. What infrastructure is required to support the proposal and when? This could be on or off-site provision

- Good access to the strategic road network, but relies on one main road in = negative impact on these residents

3. Do you know of any other constraints to developing the site?

- Impact on the listed building and its setting that is highly central to the scheme.
- Lack of turning and movement for the bus service and not as well connected as Holybourne settlement which already feels disconnected due to main road.
- Surrounded by woodland and ancient woodland and SINCs.

4. What opportunities and/or benefits do you think the proposal could bring.

No comments

5. What are the cross-boundary considerations and the potential implications? How can they be overcome?

No comments

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No comments

EXTENSION OF LAND EAST OF HORNDEAN (HAZELTON FARM) CONSULTATION QUESTIONS

RESPONSE:

1. Do you have any comments on the proposed uses?

- Appears to facilitate the proposed economic growth and housing growth aims for this area;
- Appears to be a logical extension of a proposed scheme, in a good area linked to the A3.

2. What infrastructure is required to support the proposal and when? This could be on or off-site provision

- Access to the A3 and improvements to the immediate road network.

3. Do you know of any other constraints to developing the site?

- Woodland and many services crossing the site, potential issue with flooding for Havant Thicket winter storage reservoir.

4. What opportunities and/or benefits do you think the proposal could bring.

- Creates more employment and links to a main road with better ease.

5. What are the cross-boundary considerations and the potential implications? How can they be overcome?

No comments.

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No comments.

SOUTH OF WINCHESTER ROAD CONSULTATION QUESTIONS RESPONSE:

1. Do you have any comments on the proposed uses?

No comment

2. **What infrastructure is required to support the proposal and when? This could be on or off-site provision**
Appear to be extension of ribbon development with immediate access to the strategic road network, but remote from the existing village centre.
3. **Do you know of any other constraints to developing the site?**
No comment
4. **What opportunities and/or benefits do you think the proposal could bring.**
No comment
5. **What are the cross-boundary considerations and the potential implications? How can they be overcome?**
No comment
6. **The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?**
No comment

FOUR MARKS SOUTH CONSULTATION QUESTIONS RESPONSE:

1. **Do you have any comments on the proposed uses?**
 - Does the primary school need to be moved? Do they want to be moved?
 - Does not appear to respect established pattern of settlement growth.
2. **What infrastructure is required to support the proposal and when? This could be on or off-site provision**
 - Appears to have better connections to the main road infrastructure compared to the Land South of Liphook proposals.
3. **Do you know of any other constraints to developing the site?**
 - Rather piecemeal development, are there any existing features on the site that are impacted?
 - Extends into the countryside, potentially not help integration into the community.
4. **What opportunities and/or benefits do you think the proposal could bring.**
 - Infills development, would improve connections of rights of way and allow for 'back garden' infill.
5. **What are the cross-boundary considerations and the potential implications? How can they be overcome?**
No comment.

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No comment.

NEATHAM DOWN CONSULTATION QUESTIONS RESPONSE:

1. Do you have any comments on the proposed uses?

Would it give anything back to the local community in Alton apart from some additional employment facilities of 1ha? Appears unlikely existing residents will have a need to access the rest of the site, unless using the trails and footpaths to walk around the wider area.

2. What infrastructure is required to support the proposal and when? This could be on or off-site provision

- Has ease of immediate access to the strategic road network with existing roundabout, the A31, but is distant from the train station which is difficult to mitigate.
- Is there suitable foul drainage services nearby or that can be connected to?
- Is the footbridge over the A31 suitable for increased pedestrian use?
- Is SANGs required due to the centre being 5.5km from the Wealden Heaths SPA Phase II, ie. part of the site may be within 5km of the SPA.

3. Do you know of any other constraints to developing the site?

- Encroaches into the countryside, appears remote from the town centre which is not beneficial for sustainable communities making use of existing facilities and enhancing existing communities.
- Distance from the train station for this number of new residents is not sustainable at 1.2km and difficult to overcome without encouraging cycling or taking the bus to the train station.
- Only one road access into the site, heavy traffic impact on the houses on this entry point.

4. What opportunities and/or benefits do you think the proposal could bring.

- Benefits as it is near to an existing established settlement and large economic area.
- Less impact on road system as roundabout already exists in this location, ie. no major road alterations required, impacting long term flow of traffic. Footbridge already exists which is a major benefit to the implementation of this scheme compared to other development sites needing to cross over the A31/fast moving traffic roads.
- Opportunities to open up links to existing rights of way and create better access and improve knowledge of existing public rights of way routes.

5. What are the cross-boundary considerations and the potential implications? How can they be overcome?

No comment.

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No comment.

NORTHBROOK PARK CONSULTATION QUESTIONS RESPONSE:

1. Do you have any comments on the proposed uses?

- Appear to be well thought out on how to maintain longevity of the community services and the community bus route, that may help reduce the reliance on the private car and give sustainable access to the railway station.
- Has its own SANGs on site – better access and more likely to be used.

2. What infrastructure is required to support the proposal and when? This could be on or off-site provision

- Need for footbridge over the A31 – difficult to develop and key to create links between the two parts of the site that are otherwise difficult to access due to the fast movement of traffic on the A31.
- New roundabout required – is the cost feasible and achievable? Does it impact on other traffic movement negatively?

3. Do you know of any other constraints to developing the site?

- Listed building on site, important to retain its setting, is this impacted by the proposals? The more traditional design of housing appears to show some thought towards protecting the character and setting of the listed buildings.
- The ancient woodland – is 15m enough buffer for a high density of dwellings in close proximity, as one cannot restrict ownership of plots.
- Need to cross the A31 to reach the employment site on a main road that has much fast moving traffic.
- The car park for the SANGs is at the far end of the green areas, surely better near the main entrance to the site?

4. What opportunities and/or benefits do you think the proposal could bring.

- The Village Trust may help this stand alone community succeed if the community facilities can stay open and active.

5. What are the cross-boundary considerations and the potential implications? How can they be overcome?

No comment.

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No comment.

SOUTH MEDSTEAD CONSULTATION QUESTIONS RESPONSE:

1. Do you have any comments on the proposed uses?

- Would potentially result in the loss of the identity of Medstead, removing any difference in style of area (strategic gaps) between Medstead and Four Marks, making it a large build up area.

2. What infrastructure is required to support the proposal and when? This could be on or off-site provision

- New road access junctions onto existing roads.

3. Do you know of any other constraints to developing the site?

- Would appear to result in a large built development blurring the boundary/style difference between South Medstead and Four Marks.
- Poor access to the strategic road network, A31 due to the railway.
- Piecemeal development that could have several issues whilst developing in sections.

4. What opportunities and/or benefits do you think the proposal could bring.

- Benefits are that it will infill between existing residential properties and not significantly sprawl into the countryside, though it is infill greenfield sites that are partly bounded by development.
- No environmental designations, not significant encroachment on countryside and does not impact on the setting of any listed buildings.
- Close to existing facilities and a train station is within 5-7mins walking distance.
- A relatively sustainable site to encourage walking, cycling etc.
- Protects the surrounding countryside from further encroachment.

5. What are the cross-boundary considerations and the potential implications? How can they be overcome?

No comments

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No comments

WEST OF LYMINGTON BOTTOM ROAD SOUTH MEDSTEAD CONSULTATION QUESTIONS
RESPONSE:

1. Do you have any comments on the proposed uses?

- Employment centre may be at the wrong end of the development? Is this a good location for the existing facilities and access in the area?

2. What infrastructure is required to support the proposal and when? This could be on or off-site provision

No comments. Similar to proposed development site at South Medstead.

3. Do you know of any other constraints to developing the site?

- Similar to proposed development site at South Medstead.
- Highly restricted for access to main road due to railway line

4. What opportunities and/or benefits do you think the proposal could bring.

- Close to existing services centres and no impact on listed buildings.

5. What are the cross-boundary considerations and the potential implications? How can they be overcome?

No comments.

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No comments.

OTHER CONSULTATION QUESTIONS:

7. Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, this is not included in this consultation?

- More practically sustainable sites within the SDNPA which are adjacent to the centres of existing service centres, which would require EHDC passing some of its housing allocation to SDNPA for allocation in these locations.

8. Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper?

- The assessment does not take into consideration the traffic and infrastructure impact of the proposals on the existing infrastructure and roads. It is noted that the reports required to demonstrate whether or not there would be an impact, and potential mitigation schemes are not carried out until after the sites are allocated, however, this is deemed inappropriate when considering sites of 600 homes +. This amount of homes significantly impacts any location, and the sites should be assessed for impacts on transport and traffic prior to formal allocation, and not allocated then the report undertaken, as by this point it is likely too late as the main decision has been made. The main complaint about this is that mitigation schemes will be proposed instead which are not always implemented prior to the commencement of development or at all, leaving existing residents negatively impacted by the proposals.

9. Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?

- Focus should be made on making place and enhancing existing communities;
- Reducing the reliance on the use of the car by appropriate locations of development to be able to access services required by foot or cycle;
- There

10. Is there any feedback you would like to give us about this consultation?

- The lack of communication with Parish Councils and emerging NDPs that could be impacted by a proposed Large Development Site, such as ourselves. We would have appreciated communication that this consultation is taking place and why prior to it being formally promoted as it would have assisted passing of relevant information;
- The lack of communication to the public about the consultation, and lack of promotion – very few people seem to be aware of the consultation taking place;
- The venues of the presentations are badly spread out and do not cover all the areas that are potentially impacted by one of the proposed sites, should it come forward. The locations are impractical for most people who do not live in the event location itself.
- Lack of promotion of availability of the information being online, not just at the events.

CONCLUSION:

It is the vision of the B&L NDP that our community becomes less reliant on car transport, and the NDP is seeking ways of promoting the safe and connected use of active modes of transport across our Parish, the proposed Large Development Site on Land South East of Liphook would not encourage less reliance on car transport due to its location and distance from key services.

It is considered that most of the other 9 sites are more suitable than 'Land South of Liphook' with far better sustainability overall, closer links to the major road system, frequent bus services, which are sustainable because of the size of the populations they serve and upgraded sewage and surface water drainage systems. Liphook is highly constrained as a whole Parish, and has many environmental restrictions compared to other proposed Large Development Sites.

It is important to note that the BLNDP is not anti-development. The BLNDP understands that places grow or decline but nothing stays the same, but it is important that development is located in the correct places and with suitable architectural styles and design so to have a positive impact on place and community, both physically and psychologically, and development of any level of intervention should not have a negative impact on the existing positive quality of the local area.

The cumulative conclusion of the evidence base to date is that if development has to happen, the right infrastructure, facilities and services have to be in place and improved as part of any proposals, not only to ensure these meet the current needs, but also the needs of the proposed development, whilst not negatively impacting the existing community of this Parish. This is also applicable to all places and should be applied to all the proposed Large Development Sites to ensure there is no negative impact on the existing communities.

Yours Sincerely,

The Steering Group of the Bramshott & Liphook Neighbourhood Development Plan

APPENDIX A:



Figure 1: Photograph of flooding at the Chiltley Farm site.

Large Development Sites Consultation

Deputy Executive Officer <deputy.executive.officer@bramshottandliphook-pc.gov.uk>

Thu 03/10/2019 14:01

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (610 KB)

EHDC Local Plan Questionnaire large development sites completed.pdf;

Good afternoon

Please find attached Bramshott and Liphook Parish Council's response to the Large Development Sites consultation.

Kind regards



Deputy Executive Officer
Bramshott & Liphook Parish Council
Haskell Centre
Midhurst Road
Liphook GU30 7TN
Tel: 01428 722988

Large Development Sites

(REGULATION 18)

CONSULTATION QUESTIONNAIRE

3 September – 15 October 2019



East Hampshire Local Plan Large Development Sites

This questionnaire has been prepared to assist you in responding to the consultation and should be used alongside the Large Development Sites consultation document and the Why, when and how to get involved guide.

Please note that the Council is unable to accept anonymous comments and for a comment to be formally accepted, a name and contact address (preferably e-mail) must be provided. Comments to this consultation are part of the evidence base which supports the emerging Local Plan. As such, all comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website. Your comments will be made publicly viewable at the appropriate time.

If you wish to be kept updated about this consultation and other Local Plan matters, please register for email alerts via our website.

Name

Organisation (if applicable)

Email (preferred method of contact)

Address Line 1

Post Town

Post Code



To be completed by agents acting on behalf of a client

Client Name

Client Organisation

Client Email

Client Address Line 1

Client Post Town

Client Post Code



How to respond using this form

Please refer to the *Why, when and how to get involved* guide available on our [website](#).

When responding, please include the name of the site your comments refer to. If commenting on more than one site, please make it clear which comment relates to which site.

There are a series of consultation questions. These are:

- 1: Do you have any comments on the proposed uses?
- 2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.
- 3: Do you know of any other constraints to developing the site? Please provide detail and evidence.
- 4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.
- 5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036.

- 6: Is there any reason that this is not achievable?
- 7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?
- 8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper? <link>
- 9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?
- 10: Is there any feedback you would like to give us about this consultation?



Large Development Sites

When responding to a consultation question please quote the question number from the list provided and where applicable, the site name.



Please provide your comments in the box below. Use additional sheets as required.

Click here to enter text electronically

SITE NAME: Land South East of Liphook

2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

The proposal would require improved transport and pedestrian access, including the provision of public transport.

A new school would not be needed in the parish.

3: Do you know of any other constraints to developing the site? Please provide detail and evidence.

Access to Liphook from the proposed site is via two pinch points either over a narrow railway bridge on Midhurst Road or under a railway bridge with restricted height and a sharp bend on Haslemere Road. A significant volume of traffic would use Devils Lane which has poor access on to Haslemere Road. Some of the proposed internal routes are sunken lanes and designated SINC sites and development would change the character of this area.

Although strategically Liphook has access to a railway station and the A3, in practice this is extremely constrained by limited parking, narrow rural roads and pinch points, and ultimately all traffic has to pass through the conservation area of The Square which has 5 arterial roads leading through it and becomes heavily congested during peak travel times. The new Highfield School sports facility will also generate additional traffic in the area.

Over-emphasis has been placed on the proposed site's proximity to the railway station, however a significant number of commuters travel by road and will need access to the A3 which means traversing The Square. The road and transport infrastructure around the site is poor compared with other proposed sites.

Currently there are only about 250 dwellings on this side of the railway line, a significant proportion of which are extremely low density. An additional 600 homes of high density would completely change the character of the rural edge of the settlement.

The proposed SANG lies within the South Downs National Park. It is known locally as the bomb pits and has a BOAT leading to it on the northern section, heavily used by off road vehicles which have created deep ruts and ponds making this section unpleasant for quiet pedestrian access.

Although the proposed SANG is in relatively close proximity to the proposed development site, it is accessed via a T-junction with no footpaths and poor visibility. Vehicles entering Liphook on Midhurst Road travel at speed as it is outside the speed restriction zone and there is therefore a high perceived risk factor for pedestrian crossing. The proposed SANG has no designated car parking but it is edged by the Sussex Border Path to the east. This could attract unmonitored vehicles on a key footpath in the South Downs National Park.

The proposed site borders the South Downs National Park and light generated by this development could impact the Dark Skies policy.



Click here to enter text electronically

5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

Highfield Lane falls within West Sussex County Council and South Downs National Park. This will create complexities for improving access and managing any other highways issues. A section of the proposed site falls within South Downs National Park which will create planning constraints.

6: Is there any reason that this is not achievable?

This is an outline proposal and may not be deliverable when considered in detail.

10: Is there any feedback you would like to give us about this consultation?

There has been no local consultation drop in event which has made it difficult for some residents to attend an event.

SUBMISSION

Please submit your comments to reach us by midnight on 15 October 2019 either by:

- E-mail to localplan@easthants.gov.uk
- By post to Planning Policy, East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

Thank you for taking the time to have your say.



LARGER SITES CONSULTATION

[REDACTED]

Tue 15/10/2019 13:48

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (28 KB)

EHDC Local Plan Questionnaire large development sites for web-1.pdf;

Good afternoon

Please find attached Bramshott and Liphook Preservation Society's response to the consultaton

regards

[REDACTED]

chairman

East Hampshire Local Plan Large Development Sites

This questionnaire has been prepared to assist you in responding to the consultation and should be used alongside the Large Development Sites consultation document and the Why, when and how to get involved guide.

Please note that the Council is unable to accept anonymous comments and for a comment to be formally accepted, a name and contact address (preferably e-mail) must be provided. Comments to this consultation are part of the evidence base which supports the emerging Local Plan. As such, all comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website. Your comments will be made publicly viewable at the appropriate time.

If you wish to be kept updated about this consultation and other Local Plan matters, please register for email alerts via our website.

Name

Organisation (if applicable)

Email (preferred method of contact)

Address Line 1

Post Town

Post Code



EHDC LARGE DEVELOPMENT SITES CONSULTATION RESPONSE

BRAMSHOTT AND LIPHOOK PRESERVATION SOCIETY

Unless otherwise stated, all comments refer to 'LAND SOUTHEAST OF LIPHOOK'

1. Comments on proposed use:

Development on this scale and in this location destroys the setting of Liphook as part of a clearing in a wooded landscape: the break between developed area and this landscape is lost.

600 houses over the relatively short period of 15 years or so is a huge burden on a community already struggling to cope with recent additions, and with the smaller-scale ones already planned: smaller scale sites are in any case more readily assimilable.

2. Infrastructure: SEE ALSO 3., BELOW

Access to general hospitals with 24-hour A&E is distant and unreliable

3. Constraints:

We note that the eastern tip of the area proposed is within the SDNP

Liphook has serious mains drainage issues and under-capacity.

What are the limits of capacity of the 'trunk' main sewer to Lindford STW?

Devils Lane/Chiltley Lane is not suitable for carrying any further traffic – to achieve this the special character of these rural roads would be destroyed. The Devils Lane railway bridge is single track; the junction with Haslemere Road B2131 has poor visibility, as does that of Chiltley Lane with Midhurst Road in the Liphook direction. The railway bridge by the Station of the Midhurst Road although 2-way is narrow; the Midhurst Road approaching the bridge from the Highfield end is narrow with poor forward visibility; the junction with Station Road has poor visibility.

Highfield Lane is of limited width, with poor forward visibility and a dangerous junction opposite Highfield School. The junction with Midhurst Road has limited visibility in the Hollycombe direction due to bend and slopes on the Sussex/SDNP part of the road. The junction with Haslemere Road near Lynchmere Common is dangerous, with poor visibility, difficult changes of level and high traffic speeds coming from Haslemere. The railway overbridge on the Haslemere Road is height-limited and gives a dangerous alignment and poor forward visibility for vehicles.

Pedestrian travel along the Midhurst Road Road is, in places, difficult or dangerous, with limited opportunity for improvement without demolition and significant land-take.

Pedestrian access to facilities in the northern part of Liphook would be tortuous for the remoter parts of any development here. A railway footbridge would be needed (approximately) opposite Manor Fields.

Traffic accessing the A3 would need to travel via the Midhurst Road or Station Road – both already busy and narrow, with difficult junctions – and then through The Square, a conservation area, again with difficult and regularly overloaded junctions.

4. Opportunities/benefits:

None perceived

5. Cross-boundary considerations/implications:

It is improbable that residents of the northern end of a development here would walk to the SANG (or indeed to the already well-used Lynchmere Common): this is likely to lead to excessive vehicle activity and parking on the Old Coach Road/Sussex Border Path (a BOAT).

In addition, impacts (see 3., above) on Highfield Lane and Midhurst Road landscapes in Sussex/SDNP have already been noted.

6. Deliverability within Plan period:

No comments

7. Other LD Site not included in consultation

No comments

8. Assessment process

No comments

9. Relation to other draft LP policies

No comment

10. Feedback

The lack in Liphook of any 'exhibition' of the consultation will have lowered the profile, locally, of the process, and therefore have skewed the number of comments received relative to other prospective sites.

Chawton Park Woods



Mon 07/10/2019 20:39

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (17 KB)

Consultation response.docx;

I am writing in my capacity of an Access and Bridleways Officer for the British Horse Society and as the horse riding representative on the Hampshire Countryside Access Forum regarding the proposed new development at Chawton Park Woods.

The Hampshire Countryside Access Forum is a statutory body established under the CROW Act 2000. It is concerned about the impacts of new developments on the public rights of way network and has contributed to the Hampshire County Council strategies for walking and cycling. Recently, however, it considered that similar guidance is required to protect and promote the interests and safety of equestrians. It has therefore published a guidance document

<http://documents.hants.gov.uk/countryside/Equestrians-in-Hampshire.pdf>

which it formally advises planners and developers to take into account in their work

This document clearly sets out the economic value of the equestrian industry in Hampshire, the government recognition of equestrians as vulnerable road users and the vital equestrian public rights of way issues which should be addressed in any planning application.

The developer's brochure of the planned site at Chawton Park makes several references to public footpaths and cycleways – but as is all too common – apart from a brief mention of two bridleways – it fails to address in any way the needs and safety of local equestrians.

Currently the two bridleways through Chawton Park Woods are linked by the access road to Chawton Park Farm, making a very pleasant and popular circular route. The whole of the surrounding area is home to a great many equestrians who value this vital, safe, off road provision.

The developer's plans to build 1,200 houses along this route would totally destroy this bridleway connectivity as the current access road would become a busy thoroughfare totally unsuited to equestrian use. In fact, the current bridleway would just come to a complete dead end at the edge of the woods and the two bridleways would lack a vital circular link.

One way to avoid this would be to create a purpose built bridleway from the Chawton Park Farm edge of the wood to the road just past the Sports Centre and round to link with the top bridleway. However, there may be alternative suggestions.

The problems for equestrians in this area has been highlighted recently with the traffic diversion caused by the rebuilding of the railway bridge in Alton. Traffic has been directed from Alton along past the Sports Centre and this increase in traffic has caused significant problems for horse riders – such that the town council has had to put in barriers to allow for safe equestrian access from Chawton – along the bridleway behind the Sports Centre to the Chawton Park Woods bridleway. This demonstrates precisely the dangers that local riders would face unless ample alternative safe bridleway provision is made for them.

I think it would be very beneficial for all concerned if EHDC representatives, the developers and HCC Countryside Services would agree to attend a meeting of local equestrians to explain the current provision and listen to the safety concerns and restriction of public

access to the countryside objections which the current plans have given rise to, along with a discussion of possible alternative safe routes.



Chawton School Governors Observations on Chawton Park Farm Development

[Redacted]

Tue 15/10/2019 18:03

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (8 KB)

Chawton School Governros Observations re Chawton Park Development.odt;

On behalf of the Board of Governors of Chawton C E Primary School please see attached.

[Redacted]

Chair of Governors

Governors of Chawton C E Primary School

Chawton

Hampshire

GU34 1SG

East Hants District Council

Large Sites Consultation

15 October 2019

Dear Sirs

Re: CHAWTON PARK FARM LARGE DEVELOPMENT SITE

The proposed development site at Chawton Park Farm is within the catchment area for Chawton C E Primary school. The proposal is to develop a 86 Hectare site less than 600 meters from Chawton Primary School; with the development to include 1200 houses and a new two-form entry primary school. The Board of Governors of Chawton Church of England Primary School would like to raise the following concerns :

- It is questioned whether another full primary school is required. Chawton C E Primary School, in common with a number of other primary schools in the area, are undersubscribed.
- There are no cycle or pedestrian access routes planned between the site and the village. This means (in the event a new primary school is not built) any families living there who choose to send their children to Chawton school will be forced to travel by car, thus exacerbating the amount of traffic, congestion and parking problems around our school. In line with Government policy we discourage the use of cars for school journeys as much as possible.
- With the proposed access **from the site** via Northfield Lane to the A31 roundabout, it is likely that Chawton will be used as a “short cut” to Selborne and the A3 by residents. This will increase the amount of traffic travelling through the village, increasing the risk for our children and parents who do walk and cycle to school.

- At peak times traffic trying to enter the site or travel past it into Alton will back up on to the A31 roundabout, which will cause delays and risk of accident for those of our families trying to access Chawton from surrounding villages, for drop off and pick up times.
- It is estimated that 1200 houses will generate the need for a minimum of 260 extra secondary school places. This (is in addition to other developments in and around Alton which are already being built or are in the planning stage) will create huge pressure on Alton's secondary Schools which have limited capacity for expansion. This will lessen the likelihood of our pupils and those from surrounding village schools obtaining places and they may have to travel further afield for secondary education.
- Our pupils' families will find it harder to access medical services and social services and such things as nursery places and access to the sports club.
- Chawton C E Primary School is part of the Chawton village community and provides a unique experience for the pupils, being set in a quiet, rural, environment within the South Downs National Park and with strong historic and literary roots. Our children have access to the Jane Austen Museum, Chawton House and the surrounding countryside. The pupils currently enjoy all the village has to offer, with lots of outside activities in a peaceful environment, with no threat of pollution. We fear that a development site of this size, so close, will change the nature of the village, erode the rural nature of the school and impact on our pupils enjoyment of it.

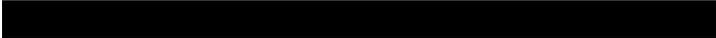
██████████

Chair of Governors

Representation received. ID:28271

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 19:04

To: 

Chawton House,

Your representation has been received.

ID: 28271

Type: Comment

Document: Large Development Sites

Section: CP2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

There needs to be significant improvement to public transport - and not just to and from Alton - as well as cycleways and pathways. Any increase in motor vehicle transport could damage the historic integrity of the village. It is unfortunate that the infrastructure does not include any new support for culture and heritage as this is critical to providing a good quality of life, and particularly given the historic significance of Chawton Park Farm.

Full Text:

A development of this size will result in increased road traffic at Chawton roundabout and through Chawton village. This cannot happen because it will harm the historic integrity of Chawton and Chawton House Estate. Therefore, any development at Chawton Park Farm has to provide considerable improvements to affordable public transport, cycle ways and walking routes to and from Alton Town centre (and Petersfield and Winchester), and disincentives to use cars and motorcycles. This would benefit the tourism sector in Alton, which is presently struggles with ineffectual public transport. It is unfortunate that the infrastructure does not provide additional support for local culture and heritage provision - particularly as Chawton Park Farm was owned by Jane Austen's brother and was part of the Chawton House Estate - as a development of this size needs to provide provision for a good quality of life.

Representation received. ID:28275

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 19:14

To: 

Chawton House,

Your representation has been received.

ID: 28275

Type: Object

Document: Large Development Sites

Section: CP3: Do you know of any other constraints to developing the site? Please provide detail and evidence.

Summary:

Full Text:

As outlined in other answers to this consultation, the primary restriction on the development of this site is the protection of the historic integrity of Chawton and Chawton House Estate. From Chawton House, all views are the unspoilt nineteenth century views that were known to Jane Austen and her immediate family. This is of international importance. An increase in road traffic noise will also harm the natural environment and this needs to be considered.

Representation received. ID:28276

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 19:17

To: 

Chawton House,

Your representation has been received.

ID: 28276

Type: Comment

Document: Large Development Sites

Section: FMS1: Do you have any comments on the proposed uses?

Summary:

Full Text:

The size of the development will undoubtedly lead to a notable increase in traffic and traffic noise. The peace and tranquility of Chawton House Estate - and its regular use by walkers, tourists and the community - is something to be protected. Whilst Chawton House understands the necessity for additional housing across the Borough, this should not damage the natural environment, including an increase in noise pollution. Measures would have to be taken to ensure no notable increase in traffic at Chawton roundabout so as not to damage the the experience of those who use the Chawton House Estate.

Representation received. ID:28280

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 19:20

To: [REDACTED]

Chawton House,

Your representation has been received.

ID: 28280

Type: Comment

Document: Large Development Sites

Section: FMS3: Do you know of any other constraints to developing the site? Please provide detail and evidence.

Summary:

Full Text:

It is unfortunate that this proposal does not identify additional support for culture and heritage, given it includes provision for 700-800 new homes. To provide an acceptable quality of life, this has to include culture and heritage provision and is surprising given the proximity to notable areas of cultural and historic importance (Alton, Watercress Line, Chawton).

Representation received. ID:28282

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 19:21

To: 

Chawton House,

Your representation has been received.

ID: 28282

Type: Comment

Document: Large Development Sites

Section: SWR2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

Full Text:

The size of the development will undoubtedly lead to a notable increase in traffic and traffic noise. The peace and tranquility of Chawton House Estate - and its regular use by walkers, tourists and the community - is something to be protected. Whilst Chawton House understands the necessity for additional housing across the Borough, this should not damage the natural environment, including an increase in noise pollution. Measures would have to be taken to ensure no notable increase in traffic at Chawton roundabout so as not to damage the the experience of those who use the Chawton House Estate.

Representation received. ID:28284

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 19:23

To: 

Chawton House,

Your representation has been received.

ID: 28284

Type: Comment

Document: Large Development Sites

Section: SM3: Do you know of any other constraints to developing the site? Please provide detail and evidence.

Summary:

Full Text:

The size of the development will undoubtedly lead to a notable increase in traffic and traffic noise. The peace and tranquility of Chawton House Estate - and its regular use by walkers, tourists and the community - is something to be protected. Whilst Chawton House understands the necessity for additional housing across the Borough, this should not damage the natural environment, including an increase in noise pollution. Measures would have to be taken to ensure no notable increase in traffic at Chawton roundabout so as not to damage the the experience of those who use the Chawton House Estate.

DRAFT LOCAL PLAN 2017-2036
LARGE DEVELOPMENT SITES CONSULTATION 2019
Under Regulation 18 during 3rd September - 15th October 2019

Summary:

Chawton Parish Council has worked with the local Parishes of Four Marks, Medstead, Ropley and our three District Councillors while attending many presentations both organised by EHDC and ourselves. During this consultation process we have engaged extensively with parishioners and the relevant local bodies directly affected by each of the proposals to understand the long-term effect these large sites would cause to this part of North East Hampshire and particularly to the Parishes of Chawton, Four Marks & Medstead.

COMMENTS SITE BY SITE:

CHAWTON PARK	OBJECTION
Summary:	
<p>We strongly object to this development on the following grounds.</p> <ul style="list-style-type: none"> • The location is completely unsuitable as it will have a detrimental impact on an area of historic woodland and natural beauty that can never be recovered • The size and scale of the location is completely disproportionate to the area • Additional access and traffic flow will make an already challenging traffic route unbearable • Environmental damage which can never be repaired • Lack of supporting employment opportunities and local infrastructure • Complete disregard to neighbouring householders and local area neighbours • Over development in a rural area • This development is using the notoriety and historic value of Chawton Village for purely material gain <p><u>The impact on Chawton Village</u></p> <p>This development falls within Chawton Parish and on the edge of Chawton village, yet Chawton itself is barely mentioned in the site's promotional material. All references are to Alton. Chawton is a small rural village famous for its literary connections to Jane Austin, it falls within the South Downs National Park and is visited by close to 100,000 tourists a year, who come to enjoy its rural charm and extensive history. We are described as 'a gem of a village' by the South Down's National Park (SDNP) and were chosen to be an official gateway location to the park. We are separate and distinct from Alton.</p> <p>There are currently approximately 200 homes in Chawton Parish. This site would add another 1200, equating to a 600% increase. This urbanisation would be catastrophic (at the national average of 2.4 people per home) we would see an additional 4222 people settled within 1km of Chawton Village. This would materially change the nature of the village, damaging its appeal and therefore also the economy of the area.</p> <p>Together with people come cars, and as the developers have no plans to increase pedestrian and cycle access from the site to the village, (which currently requires crossing the A31) there would be no social cohesion between the two and we would see a huge increase in traffic - both from anyone wanting to come to the village from the site, but also from those travelling through to Selborne and the A3. The village would suffer from increased parking problems (already a</p>	

contentious issue) and the increased noise and safety risks associated with being a commuter rat run.

The developers claim the Chawton Park Farm site would have little visual impact, but it is impossible to hide a site of 86.6 Ha. It will adversely affect the setting of the village, the SDNP and the well-used walking route 'The Pilgrim's Way' and views from the Watercress Line. The Council's own Landscape Capacity Study advises that the local area should remain generally undeveloped due to this.

This development is outside the settlement boundary of Alton and comes on top of many others taking place on its outskirts. The gaps between settlements such as ours and the town are being swallowed. This is contrary to the aims of the Local Plan, which stresses the importance of protecting the distinct nature of settlements by preserving these gaps.

Restricted access to the site and associated traffic problems

Despite the size of this development there will only be one entry and exit point. This will be on to Northfield Lane/ Chawton Park Rd. This lane is narrow and already heavily used by people travelling by car to the doctors, hospital, sports centre, tennis club, cricket club, bowling club, brownies not to mention the existing housing estates. This use will increase with the already planned Lord Major Tremors estate and employment site on Northfield Lane. With 1200 homes the Chawton Park Farm site will generate an extra 1680 cars (based on a 1.4 ownership per household), all of which will have to use the same route in and out of the site. Northfield Lane/ Chawton Park Rd is not of a suitable size to deal with this level of traffic.

On top of this is the glaring problem of the railway bridge, which Northfield lane runs under a couple of hundred metres from the Chawton round about. This is only wide enough to allow one vehicle through at a time and there are properties either side of the road north of the bridge with 4m between them. This means that a single lane will be needed right up to the arch. The developers plan to control the traffic by way of traffic lights on sensors, but the weight of traffic (particularly at commuter times) will mean traffic will back up all the way along Chawton park Rd and back the other way to the Chawton Round about, causing serious delays and safety issues on the A31. We have already seen the traffic queueing past the sports centre while traffic lights have been in place on Chawton Park Rd due to the Butts Bridge works, and this is with traffic only running in one direction and without the thousands of additional vehicles which could come.

On top of the weight of traffic and the width of the road there are additional issues: -

- The arch of the bridge is on the brow of a relatively steep hill. This restricts sight lines.
- The road runs at a 10-degree angle to the arch. This makes the visibility slightly less clear and increases the chance of large vehicles hitting it.
- The railway bridge was built in the 1800s and is unlikely to be able to withstand heavy construction traffic and an increased number of vehicles using the road through it. The Butts' Bridge arch was the same age and materials and was found to have structural issues.
- There will be **insufficient space for pedestrians and horses** pass under the bridge alongside the carriageway. The developers' plans will reproduce the dangerous situation at the former Butt's Bridge in Alton, where in that case EHDC and Knight's Brown found that:
 - *The narrow, 5m wide carriageway leads to queues.*
 - = *The brick archway runs a higher risk of being struck by high sided vehicles (e.g. HGVs) than other arrangements.*
 - *There is no foot-way provision underneath the bridge, which results in pedestrians either having to walk in the carriageway or face a detour around the bridge.*
 - *A general lack of pedestrian and cyclist facilities at the junction makes the junction unattractive and forms a barrier to pedestrian and cyclist movement.*

The Northfield Lane bridge is narrower (4m) and on the brow of a hill.

The Chawton round about is already very busy and dangerous. Vehicles using the A31 do not slow down for it and the turning into Chawton village bends back on itself meaning anyone entering the village has to slow down on the roundabout, running the risk on being hit from the side or behind by A31 traffic.

Redrow have modelled traffic flow on the roundabout but have used hopelessly outdated 2013 data. They suggest that only an extra 300 vehicles will be seen per hour at peak hour, but this is clearly nonsense. Added to that, no account has been taken of the substantial housing developments that have already taken place in Fourmarks, Medstead, Alton and beyond which have greatly increased the amount of traffic using the A31 since 2013. At present there has not been sufficient scrutiny given to traffic modelling at this location. **We would argue that the issues regarding traffic are insurmountable and therefore Chawton Park Farm cannot be considered a serious site for development.**

The developers have suggested reliance of cars can be mitigated by people walking and cycling to Alton. But it would take 1 hour to walk to Alton railway station, so that is clearly not an option for commuters and similarly the cycle route is completely unsuitable. They also claim many people would use the 64 and 38 buses which will pass the site, but again we see from the small number who use these buses from Chawton, that this is actually highly unlikely to happen.

3) Environmental damage

The Chawton Park site adjoins Bushy Leaze Wood SINC and includes a part of the Ackender Wood and Chawton Park Wood SINCs. The location is also a nationally recognised area for deer, both Roe and Fallow (British Deer Society). The housing will lie 15m from ancient woodland (the minimum required) and residents will no doubt look to have the overshadowing ancient trees removed. In fact, removal of woodland at the entrance to the site has already begun, with the felling of mature Field Maple, Oak and (undiseased) Ash trees.

The developers make much of what they say will be increased paths and cycle-paths, but there is no getting away from the fact that a huge swathe of countryside between Alton and Fourmarks will disappear. Walking or cycling in a housing estate cannot compare to walking in woods and fields and the local population of birds, small animals, insects and reptiles will suffer with the destruction of such a large area of natural habitat.

People living in this area know that the farm and valley floods and this is not reflected correctly in the EHDC assessment. An addition of 1200 homes and associated impermeable surfaces will seriously exacerbate the issue leading to significant **More data is needed regarding this risk which has been largely ignored.**

4) Lack of supporting employment opportunities and local infrastructure

The Chawton farm Development has been sold as a 'Garden village' but it does not have the infrastructure and jobs to qualify as such. It also does not have the required one job per household to adhere to council policy in this area, in fact only 0.5 to 1 Ha out of a total of 86.6Ha has been given over to employment. It cannot claim the jobs created by the planned employment site on the other side of the road, as this is a separate development. This means this will be a dormitory settlement, inhabited by commuters. Given the access restrictions and associated traffic problems this is highly undesirable.

On top of this the local infrastructure cannot cope with a development of this size. Chawton Park Surgery have said they cannot deal with the extra patients, the secondary schools in Alton will struggle to find places for the extra secondary school pupils.

5) Disruption to neighbours

It is estimated that the site will take 10 – 12 years to complete. This will cause years of misery to the many people living near the site.

6) Over development in a rural area

There are 37 dwellings planned per hectare. This is a very high density for a rural area.

People living adjacent to Northfield Lane will be hugely and unfairly affected by the scale of such a development. Five homes will become the middle section of a road and cycle roundabout (with

queuing and braking traffic all around them) and two homes abutting Northfield Lane will see increase and queuing traffic next to traffic lights.

Furthermore there has already been huge over development of housing on the western fringe of Alton.

One of our councillors helpfully put some figures together which are as follows: -
Official ONS and Department for Transport data.

Site	Year	Homes	Persons (at 2.4 nat. average)	Vehicles (at 1.4 South east average)	Distance to Chawton Park Farm site	Distance to Chawton Village centre
Lord Mayor Treloar's 1	2008	180	432	252	400m	500m

For 2018-19:

Site	Year	Homes	Persons (at 2.4 nat. average)	Vehicles (at 1.4 South east average)	Distance to Chawton Park Farm site	Distance to Chawton Village centre
Lord Mayor Treloar's 2	2019-20	274	658	384	100m	400m
Borovere Farm	2019-20	255	612	357	1000m	600m
TOTAL (and average)		529	Additional 1270 from 2019	741	550m	500m
Additionally,						
Land east of Will Hall Farm	2018	200	480	672	1300m	1500m
Land West of Will Hall Farm	2019 Draft Plan	255	612	357	1000m	1300m
TOTAL (including Will Hall Farm developments)		1164	Add. 2362 people within 1.5km	1770		

Therefore (excluding the ten-year-old Treloar's development and the Will Hall Farm developments), we already have planned from 2019:

- **1270 additional people within 600m of Chawton Village**
- **741 additional vehicles within 600m of Chawton Village**

With the new development of an extra 1200 homes then becomes:

- **4150 additional people within 600m of Chawton Village**
- **2421 additional vehicles within 600m of Chawton Village**

Chawton village currently has approx. 200 homes, 500 people and 280 vehicles.

These figures are based on national and regional averages. The true impact will be likely be higher due to the rural nature of the site and the impact from development underway and planned in Four Marks and Medstead Parish. Clearly this would be unsustainable. **Quite simply the infrastructure, schools, amenities and ecology of the area simply could not cope.**

Schooling in particular has not been thought through adequately. The addition of 1200 homes mean 2880 people of which 16.2% would be secondary school pupils (ONS national data) giving a need for approximately 467 **secondary school places**. If we take into account, the other developments planned or being built in western Alton from 2018 then this goes up to 849 additional secondary school places. The Hampshire School paces Plan 2018-21 supports this

trend. This would mean a new secondary school would be needed in west Alton or hundreds of pupils would have to be bused out to Winchester and Basingstoke on a daily basis at huge cost.

(Hampshire County Council still uses outdated methodology to address school places and use 21 secondary places per 100 homes for new builds. This, itself, would give a (very conservative) requirement for 252 places and with the other new builds in 2019, will mean 363 places.)

In terms of housing, the western Alton area has provided more than the fair share considering lack of required infrastructure accompanying developments. The East Hants Housing Requirement 2011-2028 is 8366 homes with 492 per year. Alton, and especially the western edge of Alton, has already seen over construction of new homes. According to the East Hampshire Five Year Housing Land Supply (As of 1st April 2018) outstanding Permissions (Large Sites) shows significant discrepancy per head of existing population and how housing has been concentrated into a few Wards and parishes. This has real negative impacts on infrastructure, ecosystems, services and employment, especially noting the lack of investment which accompanies this construction.

Looking at this data in the chart below it is clear that after Whitehill and Bordon (where a new town is being built), Alton has had the most houses built, whereas Petersfield and then Binsted/Bentley/Selborne and Bentworth/Froyle have not seen enough construction.

Area (Parishes and Wards)	2011 population (ONS)	Population % of East Hants	Homes outstanding or being built 2018 (large sites)	% total of Homes outstanding or being built 2018 (large sites)	Differential /housing to population
Alton (Combined Alton Parishes) and Chawton*	18261	15.7	1137	19.1	+3.4
Bentworth & Froyle Bentworth Wield Beech Lasham Shalden Froyle	2594	2.2	0	0	-2.2
Binsted, Bentley & Selborne Binsted* Bentley Selborne* Worldham* Farringdon* Kingsley*	5898	5.1	0	0	-5.1
Bramshott & Liphook	8491	7.3	437	7.3	0
Clanfield	4637	4	6	0.1	-3.9
Four Marks & Medstead Four Marks Medstead Ropley	8437	7.3	209	3.5	-3.8
Grayshott	2413	2.1	80	1.3	-0.8
Headley	5613	4.9	0	0	-4.9
Horndean (combined wards)	12942	11.2	851	14.2	+3
Liss	6291	5.4	0	0	-5.4
Petersfield (combined wards)*	14974	12.9	0	0	-12.9
Rowlands Castle	2747	2.4	213	3.6	+1.2
White Hill and Bordon (combined wards incl Lindford and Greatham)	16754	14.5	3006	50.1	+35.6
Villages in north SDNP	5644	4.9	27	0.5	-4.4

W Tisted* E Tisted* Colemore and P Dean* Hawley* Buriton* Froxfield* Steep* E Meon* Langrish* Stroud*					
	115,696		5966		

*South Downs entire or part

LAND SOUTH OF WINCHESTER ROAD

OBJECTION

Summary:

This site is unsustainable, unsuitable, undeliverable and unnecessary, and therefore OBJECT to this site's inclusion in the Local Plan as a Large Development Site on the following basis: -

- This proposal breaches the boundaries of the settlement area and community.
- The site will be in full visibility from the Watercress Line and so will have an adverse effect on the amenity of a major local tourist attraction.
- The development will affect the setting of the South Downs National Park.
- There will be a shrinking 'strategic gap' between the settlements of Four Marks and Ropley.
- The loss of prime agricultural land goes against the concerns about Climate Change, and both HCC and EDHC declaration of a Climate Emergency.
- Due to the topography there will be excessive water run off to lower levels and towards the River Itchen. The site will require nitrate mitigation, which has not been mentioned.
- Any consideration for traffic management will have an adverse effect on the free flow of the A31 trunk road, already a high capacity route exacerbated by being single carriageway through Four Marks.

WEST OF LYMINGTON BOTTOM ROAD

OBJECTION

Summary:

This site is unsustainable, unsuitable, undeliverable and unnecessary, and therefore OBJECT to this site's inclusion in the Local Plan as a Large Development Site.

- Insufficient employment provision for the additional households.
- Existing retail provision with permission to expand meet current employment needs, not
- The site will be in full visibility from the Watercress Line and so will have an adverse effect on the amenity of a major local tourist attraction.
- There is no clear definition of what recreational space and facilities are provided, and therefore not policy compliant with the plan.
- Developing a large area of open space and agricultural land will have a detrimental effect on the existing landscape setting of this area of Medstead.
- The loss of agricultural land goes against the action against climate change, developing agricultural land will only add to carbon emissions, and not adhere to the directive to ensure there are zero carbon emissions by 2025.
- Potential water run off to lower levels and towards the River Itchen, therefore the site will potentially require nitrate mitigation
- There is no commitment to build or introduce infrastructure. There is a requirement for a community building and/or land to satisfy the needs of the whole community

SOUTH MEDSTEAD	OBJECTION
Summary:	
<p>This is a fragmented site, there will be no social cohesion, just random pieces of land put forward with clear divisions and gaps. A speculative proposal and a consortium of opportunism.</p> <ul style="list-style-type: none"> • This is a Bolton to existing developments, fragments the existing settlement and detrimentally affects the existing landscape. 	
FOUR MARKS SOUTH	
Summary:	
<p>This is a fragmented site, there will be no social cohesion, just random pieces of land put forward with clear divisions and gaps. A speculative proposal and a consortium of opportunism.</p> <ul style="list-style-type: none"> • This is a fragmented site, there will be no social cohesion, just random pieces of land put forward with clear divisions and gaps. A speculative proposal and a consortium of opportunism. 	
NEATHAM DOWN	OBJECTION
Summary:	
<p>This proposal changes the nature of Alton by moving it to the South side of the A31 and outside the natural containment of the existing town. It will be a highly visible site and affect the setting of Alton due to its topography. Lack of local employment opportunity will affect commuter access, and the current station car park would not be cope with increased capacity, and additional strain on the A31. You have to go through the designated employment area to get to houses and is an inadequate size. This site is not deliverable, nor sustainable, and would have a detrimental effect on its locality and OBJECT to its inclusion as a large development site.</p>	
LAND SOUTH EAST OF LIPHOOK	NEUTRAL
Summary:	
<p>There are several pros and cons with this site, it is self-contained land with good transport connections, it makes the existing site more viable and is a natural completion of the site. However, the additional traffic movement will have an adverse effect and disrupt the village centre. This proposal is neither supported nor objected to and remain NEUTRAL on this proposal.</p>	
LAND EAST OF HORNDEAN	NEUTRAL
Summary:	
<p>Although there are clear merits of the site; it abuts the new development, has good transport links, but the new development of 700 has not yet been built out and therefore believe it is too premature to bring this site forward for inclusion at this stage. This proposal is neither supported nor objected to and remain NEUTRAL on this proposal.</p>	
NORTHBROOK PARK	SUPPORT
Summary:	

<p>This proposed development is well designed and advanced in planning, it is a sustainable, self-contained development, with easy access to transport links and two local railway stations, with good commercial provision.</p> <p>There are active discussions on mitigation of traffic, alleviating concerns over A31 capacity. The community facilities provided will be run in trust in perpetuity.</p> <p>It is a flat, well screened sight, currently parkland with a provision of 15 hectares of SANGS</p>	
WHITEHILL AND BORDON	SUPPORT
Summary:	
<p>This site is fully viable, has new Infrastructure already in place, and significant transport links.</p> <p>It is a good example of a well-considered proposal, within the award winning eco redevelopment, with one landowner and primarily an MOD brownfield site.</p>	

Final Conclusion.

Allowing such an opportunistic development as the Chawton Park Farm (Alton) Development therefore extending the settlement area of Alton would be a disaster for the environment, local residents, local services and even international tourism. It will adversely affect the character of Chawton Village and South Downs National Park and while access is problematic now it will have irreversible consequences that the local Towns and villages will have to live with for generations to come.

This development (like many the others) is driven purely out of financial motivational gain and has no consideration to any planning, environmental or sustainability requirements of the local area now or in the future.

EHDC Local Plan (Large Development Sites Consultation)

[REDACTED]@chichester.gov.uk>

on behalf of

PlanningPolicy <planningpolicy@chichester.gov.uk>

Mon 14/10/2019 14:33

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Dear Planning Policy Team,

Thank you for consulting Chichester District Council on East Hampshire's Large Development Sites document. The following comments comprise an officer response to the consideration of the consultation document and background paper.

The two sites of most interest to this authority, given their proximity to the Chichester District boundary are as follows:

- Land South East of Liphook; and
- Land East of Hordean (Hazelton Farm)

In more general terms the South Downs National Park forms a significant 'buffer' between areas for development proposals between the EHDC plan area and the Chichester District Council plan area. However, for both sites, our main comments relate to the potential cumulative transport issues that may arise from the need to consider development within Havant Borough and the Chichester DC plan area along with the proposals currently set out in the EHDC document.

In that respect the following comments are made:

- Further consideration needs to be given to the transport impact implications arising from development (in HBC, CDC plan area and EHDC plan area) on the junction/access for Hazelton Farm onto the A3.
- The potential transport implications of cumulative development in the three plan areas also requires further consideration. In this respect, if access to Chichester's transport study modelling work would be beneficial to your authority then we may be able to provide access to this to help inform your on-going work?
- Consideration of the potential impacts arising again from the cumulative impact of development proposals (in HBC, Chichester plan area and EHDC plan area) on vehicular pollution on SACs at Buster Hill, Evernote Common and The Mens. These three sites are referenced in the HRA for Chichester's Preferred Approach version of the Local Plan Review, that can be viewed [here](#)

Whilst writing, we would like to reiterate our support, in principle, to the drafting and preparation in due course of a Statement of Common Ground between our authorities.

Kind regards,



[REDACTED]
Planning Policy Officer
Planning Policy
Chichester District Council

Ext: 34758 | Tel: 01243534758 | bbayliss@chichester.gov.uk | Fax: 01243776766

<http://www.chichester.gov.uk>

[www.facebook.com/ChichesterDistrictCouncil] [www.twitter.com/ChichesterDC]

From: EHDC - Local Plan [<mailto:LocalPlan@easthants.gov.uk>]

Sent: 03 September 2019 11:24

Subject: EHDC Local Plan (Large Development Sites Consultation)

Good morning

Notice of Consultation on the East Hampshire Local Plan (Large Development Sites Consultation)

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is consulting on the new Local Plan 2017-2036. The new Local Plan 2017-2036 provides a policy framework for planning and development for the areas of the district that lie outside of the South Downs National Park.

The Council invites you to make representations in regard of the scope, subject and contents of the Local Plan.

The consultation focusses on 10 strategic sites which could be allocated in the new Local Plan in line with its emerging spatial strategy. Comments are being sought on each of the sites to help inform decision about which sites to allocate within the Proposed Submission Local Plan (Regulation 19).

This Local Plan Large Development Sites is available for public consultation for a period of six weeks between 3 September 2019 and midnight 15 October 2019.

Consultation documents and comment forms can be found and completed online via the Council's consultation page at <http://www.easthants.gov.uk/draft-local-plan>.

Where possible, comments should be submitted electronically via our online portal: <https://easthants.oc2.uk/>. Where this is not possible comments can also be emailed to localplan@easthants.gov.uk or posted to Planning Policy East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

If you have any enquiries regarding the Regulation 18 Local Plan Large Development Sites consultation, please email localplan@easthants.gov.uk or call 01730 234102 and a member of the Planning Policy Team will be able to assist.

Kind regards

The Planning Policy Team



LEGAL DISCLAIMER

Communications on or through Chichester District Council's computer systems may be monitored or recorded to secure effective system operation and for other lawful purposes.

Large Sites Consultation

[REDACTED]

Mon 14/10/2019 11:11

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (304 KB)

CPRE Surrey response to Large sites.docx;

The response to the consultation by CPRE Surrey is attached.
[REDACTED] Vice Chairman CPRE Waverley District Committee.

CPRE SURREY Response to East Hampshire Draft Local Plan Large Development Sites Consultation

Land at Northbrook Park, Bentley Parish

1. CPRE Surrey considers that the allocation of Northbrook Park as a Large Development Site for housing would be wholly inappropriate and supports the views of CPRE Hampshire. CPRE Surrey strongly supported the decision by Waverley Borough Council to reject the part of the site in Waverley Borough, which was put forward by the owner for housing in the Waverley Borough SHLAA
2. The Northbrook Park site is a predominantly greenfield site in the middle of attractive unspoilt open countryside adjoining the River Wey and its floodplains, situated in the countryside between the historic town of Farnham in Surrey/Waverley and Bentley, the nearest village in East Hampshire. We consider that the proposed development would be enormously damaging to the overall character, quality, tranquillity and appearance of the landscape and countryside between Farnham and Bentley and thus to the setting of the South Downs National Park and Alice Holt Forest. It would cause light and noise pollution to a dark and tranquil area and damage the setting of heritage listed buildings.
3. This is a “valued landscape”, as CPRE Hampshire explain in detail in their response. NPPF para 170(a) requires that the planning system and decisions should contribute to and enhance the natural landscape by protecting and enhancing “valued” landscapes, and para 170(b) recognises the intrinsic character and beauty of the countryside.
4. Paragraph 4B.20 of the East Hampshire Landscape Character Assessment states that the overall management objective for the LCA within which the site sits is “to conserve the tranquil, natural character of the Northern Wey Valley, and the individual identity of the small villages set on the gravel terrace above the floodplain. The valley should provide an open rural landscape between the towns of Alton and Farnham. The character of the enclosing valley sides, particularly the downland to the north of the Wey, which form the backdrop to the valley, should also be conserved.”
5. The draft EHDC Local Plan includes Strategic Policy S17 which reflects the purposes of the NPPF and acknowledges the importance of gaps between settlements, providing that “It is important that the individual identity of settlements and the integrity of predominantly open undeveloped land between settlements in the areas is not undermined. Gaps have not been defined for the express purpose of protecting the countryside but designed to shape the patterns of towns and villages. A clear break between settlements helps to maintain a sense of space.” The theme is developed in Policy DM24.
6. The latest ONS statistics clearly demonstrate that many calculations of Objectively Assessed Need (OAN) are currently greatly overstated and the trend is likely to show a reduction over the

next few years. We consider the Council should take a cautious approach to avoid the risk of building the wrong houses in the wrong places. This is particularly important in the first five years to avoid large developments in the countryside which will require significant infrastructure which developers and the Government are unlikely to be able to supply. Allocation of this site for housing cannot safely be justified by housing need in circumstances where the OAN is, by reason of the above uncertainties, no longer an objective assessment.

7. The meadows to the south of the A31 adjoining the River Wey play an important role in flood defence. This is acknowledged in the SFRAs. The NPPF seeks to steer major development away from floodplains and imposes an exception test that must be satisfied if such development is sought. It is far from clear how Northbrook Park site could satisfy the Exception Test, in view of the fact that there are up to nine other sites being put forward by EHDC.

8. The River Wey and its flood plains are important for biodiversity and are the subject of biodiversity improvement plans. The Northern Wey floodplain is Biodiversity Opportunity Area 17 and forms part of the Local Ecological Network for Hampshire, also part of the EHDC Green Infrastructure Strategy. The impact on biodiversity connectivity would be systemic affecting the ecological network and the delivery of eco-services as a whole. The flood meadows lead right up to the edge of Holt Pound Inclosure in Alice Holt Forest. Alice Holt Forest is ancient woodland and a Site of Importance for Nature Conservation and it is well recognised that ancient woodland requires appropriate semi natural adjoining buffer zones. It must be clear that no net gain in biodiversity could be achieved as required by the NPPF. The area south of the A31 leading down to and across the River Wey should not be built on.

9. CPRE Surrey questions the sustainability of the proposed development, being located in open countryside with few nearby facilities or infrastructure. The site is unlikely to be able to provide the necessary infrastructure, such as schools, shops and medical facilities, which means that there would be increased pressure on Farnham's public services. The result would be that many of the infrastructure costs of the development fall on Waverley rather than EHDC.

10. In the context of Waverley, the development would be likely to be very damaging to Farnham. It would certainly lead to increased traffic congestion to Farnham, as most of the additional traffic would be along the A31 towards Farnham, which is already overloaded at peak times and will be worse once the developments at Bordon Whitehill and Coxbridge roundabout are completed. Much car traffic will be making for Farnham station where the car parking facilities are already under pressure despite the recent first storey extension. The Site Assessments Background paper indicates that there has been no or little consultation with Waverley or Farnham Town Council regarding the likely adverse impacts of the development on Farnham. NPPF paragraphs 24-27 require effective and on-going joint working between strategic policy making authorities and relevant bodies in order to produce a positively prepared and justified strategy. There is little evidence of any such joint working or compliance with the duty to co-operate.

11. CPRE Surrey considers that the site at Northbrook Park is totally unsuitable as a Large Development Site for the reasons set out above and that it should be removed from the list of possible sites.


Chairman

CPRE Surrey Waverley District Committee

14th October 2019

CPRE Hampshire Response to East Hampshire Consultation on Large Development Sites

[REDACTED]s@cprehampshire.org.uk>

Mon 14/10/2019 11:17

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [REDACTED]

📎 1 attachments (561 KB)

14.10 CPRE Hampshire Response to East Hampshire Consultation on Large Development Sites.docx;

14th October 2019 - by email

Please find attached the CPRE Hampshire Response to the East Hampshire Consultation on Large Development Sites.

I would be grateful if you would kindly acknowledge receipt of this email.

Kind regards and best wishes,

[REDACTED]
Chief Executive
CPRE Hampshire

Mobile: [REDACTED]

Office: [REDACTED]

www.cprehampshire.org.uk



The countryside charity
Hampshire

East Hampshire Planning Policy

14 October 2019

Dear Sir

**East Hampshire Draft Local Plan
Response to Large Development Sites Consultation**

This is the Response of CPRE Hampshire to the Large Development Sites Consultation

Applying principles of Sustainability

As said in our Response to the Draft Local Plan Review Consultation, we agree in principle that new settlements can present an opportunity to be ambitious, achieving the highest standards of design, the most sustainable development layouts and the most inclusive and positive communities, supported by innovative technologies and modern approaches to infrastructure.

However, NPPF 2019 paragraph 72 makes it clear that a standalone new settlement should be of a size to support a sustainable community, with sufficient access to services and employment opportunities within the development itself or in larger towns where there is good access. It is Government policy in relation to Garden Villages, and widely acknowledged, that at least 1500 homes is needed for a new standalone community in order to provide the necessary critical mass. Whitehill Bordon is a good example of such a new settlement, development of which we have always supported.

This Consultation concerns proposed sites for 600 homes or more, but none of which is proposed accommodate as many as 1500 new homes. It is not, therefore a consultation involving a new settlement, but rather on identifying two large sites for housing development, as the title indicates.

In principle we consider that, in order to meet Government mandated housing numbers at the later end of the Plan Period, identification of one or more large sites for housing development is strongly preferable to yet more sporadic development across the District, adding to the large numbers already under construction or consented.

But, in order to meet the requirements of sustainability these two large development sites will need to become part of an existing settlement of significant size in order to take advantage of the existing infrastructure, facilities and services available there, provided these are sufficient to meet the needs of the existing and new residents after incorporating infrastructure provided by the large development.

Northbrook Park

Yet, contrary to the above principles of sustainability, Northbrook Park is proposed as standalone development for 800 homes, with poor access to Farnham some 3 kilometres distant. This would not achieve the sustainability requirements for a new settlement and should now be ruled out of the process.

Whitehill Bordon

However, the proposed Large Development Site for 1284 homes at Whitehill Bordon as part of the new settlement already approved and under construction would very much accord with the above principles of sustainability, as well as being a continuation of the current strategy for regeneration of the former Bordon Garrison. The site would be essentially brownfield development, which CPRE strongly supports, and would be able to take advantage of existing and proposed employment provision, the well developed plans for a new town centre, and the newly completed relief road. The proposed SANGS would avoid adverse impacts on the Wealden Heaths Phase II SPA.

Accordingly, CPRE Hampshire supports the Large Development Site proposed at Whitehill Bordon. This Site also has the support of the Council.

In addition to the proposed Large Development Site at Whitehill Bordon we are aware of a site owned by Hampshire County Council at Whitehill Bordon which has been rejected as a Large Development Site as it is assessed not to have capacity for 600 homes. Yet it has been proposed for 510 homes, which is little short of 600, and its development could make a significant contribution to required housing numbers to the relief of a Large Development Site in open countryside. Again it would benefit from being part of the regeneration of Whitehill Bordon and contribute to the sustainability of the new settlement there.

Exclusion of Valued Landscapes

The Draft Local Plan, as consulted on, rightly provides that the countryside will be protected for its landscape, natural resources and ecological value as well as its intrinsic character and beauty. Also that new development "should be located to protect and enhance valued and high quality landscapes".

We supported these policies in our Response, which reflect well NPPF para 170(a) requiring that the planning system and decisions should contribute to and enhance the natural landscape by protecting and enhancing "valued" landscapes, and para 170(b) which recognises the intrinsic character and beauty of the countryside.

In *Stroud District Council v Gladman Developments* the Court of Appeal recognised the concept of a "valued landscape" as something different from a Designated Landscape to which specific planning rules apply as set out in NPPF. Following that decision, it is now established in appeal decisions that landscapes that have demonstrable attributes that raise them above the ordinary may constitute "valued landscapes".

In assessing whether a landscape has such demonstrable attribute use has been made by Inspectors on appeal of the Landscape Institute Guidelines for Landscape and Visual Impact Assessment (GVLIA), as well as prior appeal decisions and their own judgment and reasons.

We have visited all the proposed Large Development Sites and, applying the principles established in GVLIA and appeal cases, have assessed each Site as to its demonstrable attributes in terms of both landscape character and physical distinctiveness, and public experience of the landscape

Our detailed assessments are set out in **Appendices A to D** of this Response, which are to be read as an integral part of this Response. We believe these assessments would be upheld by the Inspector at Examination of the Draft Local Plan.

CPRE Hampshire has concluded that the following proposed Large Development Sites are located within a "valued landscape":

- Chalton Park Farm, Alton
- Neatham Down, Alton
- Land South of Winchester Road, Four Marks
- Part of Northbrook Park

it is accepted by the Court and Inspectors on appeal that identification as a "valued landscape" indicates development should be restricted, on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused.

Accordingly, we consider that allocation of any of the above sites as a Large Development Site would be wholly inappropriate, contrary to established planning rules for "valued Landscapes" as well as the principles for protecting landscape set out in the Draft Local Plan, and so would render the Draft Local Plan Unsound at Examination.

We note that table setting out the Council's Site assessment of the proposed Large Development Sites in traffic light form in the Background Paper does not have a column for landscape, despite this being raised as an issue in several developers' proposals. Such a column needs to be added with a red light for each of the above 4 Sites to indicate "valued landscape".

Identifying a further Large Development Site

As regards identifying, so far as necessary, one Large Development Site in addition to Whitehill Bordon from the 5 remaining Sites, we accept this will require a planning balancing to be made by the Council. CPRE Hampshire does not have the detailed knowledge of all the factors which will need to be taken account of in relation to each Site, and so offers no order of preference. However we consider it important that the following matters of particular CPRE interest are given high priority in reaching a decision:

- community concerns expressed in response to this consultation
- pertinent policies in relevant "made" Neighbourhood Development Plans
- minimising loss of countryside outside existing Settlement Policy Boundaries
- reducing CO2 impacts from transport by selecting a location close to employment prospects, public transport, services and facilities, using the *Transport for New Homes Checklist*
- opportunities for walking and cycling to work, services and facilities
- protection of the setting of Heritage Assets
- high quality design

and

- before consideration for inclusion in the Local Plan, a professional assessment by independent consultants agreed by HCC but paid for by the developer for each site, of road improvements and traffic management measures which would be required to prevent increased congestion and reductions in road safety in the local area, and
- before consideration for inclusion in the Local Plan, a professional assessment by independent consultants agreed by the relevant public body but paid for by the developer for each site of the infrastructure which would need to be provided by the large development to the existing settlement to ensure the needs of the existing and new residents are met, and the phase of development of the site when it needs to be provided

Reserve Site

While the District is required to accept housing numbers based on the current standard methodology for calculating housing need, this may well change over time with changes in government or acceptance by central government of the current decline in household formations. So, it may well be that some of the housing numbers stated in the Draft Local Plan will not end up being needed during the Plan Period.

If the numbers needed were to fall significantly, or some be absorbed by a large windfall site, then a Large Development Site outside Whitehill Bordon would likely not be required. We therefore suggest that any such Site be allocated in the Draft Local Plan as a Reserve Site, which would only be released if shown to be required within 5 yearly Local Plan reviews, and otherwise remain subject to countryside policies. EHDC has past experience of Reserve Sites.

CPRE Hampshire South Downs & Central Planning Group

Appendix A - Land at Chawton Park Farm, Alton

Appendix B - Land east of the A31 at Neatham Down, Alton

Appendix C - Land South of Winchester Road, Four Marks

Appendix D - Land at Northbrook Park, Bentley Parish

Appendix A - Land at Chawton Park Farm, Alton

Land at Chawton Park Farm, Alton, ("the Site") is being considered for a large development site of up to 1250 dwellings

CPRE Hampshire has now had the opportunity to make an assessment of the Site in the context of a "valued" landscape on which development is restricted in accordance with national guidance. This assessment has regard to:

- Hampshire Integrated Landscape Character Assessment ("HILCA")
- East Hampshire Landscape Character Assessment ("EHLCA")
- a study of criteria used by Inspectors on appeal in deciding whether appeal sites are "valued" landscapes
- our own observations

Assessment of landscape character and physical distinctiveness

Chawton Park Farm is situated about 1 kilometre to the west of the built up area of Alton. The Site extends westwards for a distance of 1.5 kilometres. It is on the central eastern edge of LCA 6a - East Hampshire Wooded Downland Plateau in HILCA and north eastern part of LCA 2B - Four Marks Clay Plateau in EHCLA. The Site is in a narrow valley of pasture and arable fields, leading up on the northern side to a plateau and then into broadleaved woodland reaching to the skyline. The southern side consists of a grassland field rising up the valley side and leading into broadleaved woodland, again reaching to the skyline. This woodland shields the valley from the Watercress Line and the A31 further to the south. The valley, as a whole, has a strong sense of enclosure and seclusion.

Within the Site, the valley floor contains at the eastern end an unclassified road bordered by hedgerows serving Chawton Park Farmhouse. This leads past the farmhouse and yard into a bridleway with, on the northern side, a narrow piece of broadleaved woodland containing some fine trees. The bridleway continues along the valley floor to the western end of the Site where it enters woodland.

Chawton Park Farmhouse is a grade II listed building with an historic barn in the yard immediately to the west, and other buildings of considerable character to the south of the road.

The valley has a strong rural and physically distinctive character, especially on the southern side of the bridleway as the grassland field on the valley side leads down to the historic Chawton Park Farmhouse and associated buildings.

Around the Farmhouse to the north, and to the south of the public road, the landscape of fields is more open, but still contained in a valley leading to broadleaved woodland north and south. New Cottages, situated on the road, do not have the historical interest of Chawton Park Farmhouse, but are typical of cottages built for agricultural workers.

The Site is fully representative of the peaceful rural landscape of the Four Marks Clay Plateau.

This landscape is within the Wooded Downland Area of Special Landscape Quality as proposed in a Report by RPS Watson to East Hampshire District Council dated 8 December 1994, based on its scarcity value, scenic quality, unspoilt character and sense of place. This assessment is as valid today as it was in 1994. It is within an area of Medium / Low Landscape Capacity in the East Hampshire Landscape Capacity Study.

Assessment of public experience of the landscape

The Site is experienced by the public from the public road leading to Chawton Park Farmhouse, the bridleway leading west from the farmhouse up the valley, and a bridleway at the eastern end of the Site which leading north from the road through woodland up the valley side.

From the bridleway, which is obviously much used, the view down the valley leading to the Grade II listed Chawton Park Farmhouse and associated farm buildings is one of great natural beauty, historical resonance and tranquillity (in its widest sense). It is not spoilt by any modern agricultural buildings visible at Chawton Park Farm. The scene is framed by the woodland on the valley side to the south and the strip of woodland adjoining the northern side of the bridleway. Views into the fields to the north through the strip of woodland are limited, but the rising valley side, with its own tranquillity, contributes to the overall beauty of this landscape and to its strong feeling of enclosure and seclusion. This bridleway provides an outstanding countryside experience.

From the public road and the bridleway leading northwards at the eastern end of the site there are views of an unspoilt valley which, if not to the same degree as those from the main bridleway, have a clear sense of enclosure and seclusion.

Accordingly, taking account of

- **the distinctive character of this undeveloped valley of great natural beauty, with its strong historic resonance and tranquillity,**

- **the high quality of the public experience of this landscape, especially from the bridleway running in the valley bottom, and**
- **the significant contribution to the landscape character areas identified in HILCA and EHLCA**

CPRE Hampshire considers the Site has demonstrable attributes which raises it above the ordinary such that it is a "valued landscape" to which NPPF paragraph 170(a) applies.

Clearly, allocation of the Site for housing would destroy its peaceful rural character and tranquillity by introducing visually intrusive development, with accompanying lighting and noise, up the valley sides, ruining the outstanding public experience of this landscape from the bridleway on the valley floor. This high quality countryside experience would no longer be available to residents of nearby Alton.

Appendix B - Land east of the A31 at Neatham Down, Alton

Land east of the A31 at Neatham Down, Alton ("the Site") is being considered for a large development site of 600 dwellings

CPRE Hampshire has now had the opportunity to make an assessment of this area in the context of a "valued" landscape on which development is restricted in accordance with national guidance. This assessment has regard to:

- Hampshire Integrated Landscape Character Assessment ("HILCA")
- East Hampshire Landscape Character Assessment ("EHLCA")
- a study of criteria used by Inspectors on appeal in deciding whether appeal sites are "valued" landscapes
- our own observations

Assessment of landscape character and physical distinctiveness

The area being considered is north of Neatham Down and Golden Chair Farm, some 1.5 kilometres from the centre of Alton. The Site extends north westwards for a distance of some 600 metres. It is within an open downland part of LCA 3f - Wey Valley in HILCA, and is a chalk outlier on the western edge of LCA 6C - Worldham Greensand Terrace in EHCLA.

The Site is within a landscape to the east of the A31 consisting of a tract of chalk outliers extending over some 2.5 kilometres running north east to south west which form the western edge of the Worldham Greensand Terrace LCA and the eastern side of the Wey Valley opposite the town of Alton. These outliers include Copt Hill and Neatham Down, extending over to the west of the A31 at Windmill Hill.

The landscape consists of large fields of mainly arable land bounded by hedgerows with small areas of woodland. It is very open and rolling landscape with long vistas across Alton to the elevated chalk plateau which rises steeply behind the town and runs parallel along the opposite side of the Wey Valley, and long vistas to the south east and south towards the South Downs National park at East Worldham and Selborne.

The A31 runs north east/south west between the chalk outliers, with the B3004 (Cakers Lane) to the south of Neatham Down leading eastwards away from the A31 to East Worldham and Kingsley. To the north of the B3004 the Hangers Way trail also leads eastwards from the A31 around the lower part of the southern slope of Neatham Down to East Worldham. A footpath runs north west from East Worldham across the eastern slope of Neatham Down to Copt Hill and then to the A31.

In a field immediately adjacent to B3004, on the northern side, is a solar farm.

This landscape is one of great natural beauty and is essentially peaceful and tranquil, little disturbed by the A31 or the town of Alton which are largely hidden by hedgerows and woodland. It is entirely undeveloped, other than the solar farm mentioned

This tract of landscape is within the Wooded Downland Area of Special Landscape Quality as proposed in a Report by RPS Watson to East Hampshire District Council dated 8 December 1994, based on its scarcity value, scenic quality, unspoilt character and sense of place. This assessment is as valid today as it was in 1994

Assessment of public experience of the landscape

This open tract of landscape is experienced by the public from the A3 (mainly in winter when the hedgerows lining the road are devoid of leaves), from Cakers Lane, from the Hangers Way, from the footpath leading to Copt Hill, and across the A31 from public vantage points in Alton, notably Windmill Hill .

Views are drawn to the chalk outliers of Neatham Down, Windmill Hill and Copt Hill (where visible), but the arable fields and hedgerows leading up to the outliers are very much part of the overall impact of natural beauty. Wide open views as described above are experienced from parts of the Hangers Way and the footpath leading to Copt Hill.

The landscape provides a high degree of tranquillity (in its widest sense) despite the presence of the A31 and the solar farm north of Cakers Lane. It has a sense of place which is quite separate from that of the town of Alton, from which in large part it is separated by the A31.

The Site itself is visible from the footpath leading to Copt Hill which borders two sides of the site.

Accordingly, taking account of

- **the scenic quality and unspoilt character of this undeveloped tract of landscape of great natural beauty, with its open views and strong sense of tranquillity,**
- **the high quality of the public experience of this landscape,**
- **the significant contribution to the landscape character areas identified in HILCA and EHLCA**

CPRE Hampshire considers the Site forms part of a tract of landscape which has demonstrable attributes which raises it above the ordinary, such that it is a "valued landscape" to which NPPF paragraph 170(a) applies.

Allocation of the Site for housing would bring development over the A31 into a tract of landscape which is undeveloped and separate from the town of Alton, impinging on its natural beauty and tranquillity by introducing visually intrusive development, with accompanying lighting and noise. This would set a precedent for further development on the eastern side of the A31 which would potentially destroy this "valued landscape".

Appendix C - Land South of Winchester Road, Four Marks

Land west of Four Marks ("the Site") is being considered for a settlement of 600 dwellings

CPRE Hampshire has now had the opportunity to make an assessment of this area in the context of a "valued" landscape on which development is restricted in accordance with national guidance. This assessment has regard to:

- Hampshire Integrated Landscape Character Assessment ("HILCA")
- East Hampshire Landscape Character Assessment ("EHLCA")
- a study of criteria used by Inspectors on appeal in deciding whether appeal sites are "valued" landscapes
- our own observations

Assessment of landscape character and physical distinctiveness

The area being considered is [*on the southern side of the A31 as it approaches Four Marks from the south west*]. It is at the eastern edge of LCA 7d - Bighton and Bramdean Downs in HILCA, and the western edge of LCA 2B - Four Marks Clay Plateau in EHCLA.

The Site is on land which rises to the western edge of the built up area of Four Marks. It is within open chalk downland, level at the upper end where it joins Barn Lane, but then on a gradual slope which leads on down to Horse Land and Manor Farm. It is open arable land.

From the Site there are very fine long distance views to Cheesefoot Head and the Winchester Science Centre, both within the South Downs National Park.

The A31 runs along the northern boundary with Brislands Lane, a rural road, to the southern boundary. It is bounded to the north and north west by part of Barn Lane track and a Byway Open to All Traffic (BOAT) track.

The Site is part of tract of landscape running between North Street and Four Marks consisting of a valley of chalk downland rising some 70 metres each side. The A31 is at the bottom 100 metre contour, rising sharply as it approaches Four Marks, with the Watercress Line some 300 metres to the north. This valley is of considerable natural beauty. It is entirely undeveloped beyond the two transport corridors.

This landscape is within the Downland with Woodland Area of Special Landscape Quality as proposed in a Report by RPS Watson to East Hampshire District Council dated 8 December 1994, based on its scarcity value, scenic quality, unspoilt character and sense of place. This assessment is as valid today as it was in 1994. It is within area 2b.7 (Medium Landscape Capacity) in the East Hampshire District Landscape Capacity Study

Assessment of public experience of the landscape

This open tract of landscape is experienced by the public from the A31 (mainly in winter when the hedgerows lining the road are devoid of leaves) and the Watercress Line, from Horse Lane, from Barn Lane and from the BOAT referred to (again mainly in winter when the hedgerows are devoid of leaf)

For those many members of the public travelling on the A31 and Watercress Line there is a very real sense of being within a valley forming part of a large tract of open countryside, all of considerable natural beauty. The built up area of Four Marks, beyond the crest of the hill, is not visible.

From Barn Lane and the BOAT the public can experience the very fine long distance views to the west. From the A31 and Horse Lane it is a view of open arable downland leading up to woodland at the summit. The footpath between Ropley Stoke and Brisland Lane runs through tranquil countryside.

The landscape provides a high degree of tranquillity (in its widest sense) despite the presence of the A31 and the Watercress Line. It has a sense of place which is quite separate from that of the settlement of Four Marks, where development is largely beyond the summit of the hill.

Accordingly, taking account of

- **the scenic quality and unspoilt character of this undeveloped tract of landscape of considerable natural beauty, with its long distance and open views and sense of tranquillity,**
- **the quality of the public experience of this landscape,**
- **the contribution to the landscape character areas identified in HILCA and EHLCA**

CPRE Hampshire considers the Site forms part of a tract of landscape which has demonstrable attributes which raises it above the ordinary, such that it is a "valued landscape" to which NPPF 2019 paragraph 170(a) applies.

Allocation of the Site for housing would bring development over the A31 into a tract of landscape which is undeveloped and separate from the town of Alton, impinging on its natural beauty and tranquillity by introducing visually intrusive development, with accompanying lighting and noise. This would set a precedent for further development on the eastern side of the A31 which would potentially destroy this Valued Landscape.

Appendix D - Land at Northbrook Park, Bentley Parish

Land at Northbrook Park (the Site") is proposed to be allocated for a new settlement in the Draft East Hampshire District Local Plan.

CPRE Hampshire has now had the opportunity to make an assessment of the Site in the context of a "valued" landscape on which development is restricted in accordance with national guidance. This assessment has regard to:

- Hampshire Integrated Landscape Character Assessment ("HILCA")
- East Hampshire Landscape Character Assessment ("EHLCA")
- a study of criteria used by Inspectors on appeal in deciding whether appeal sites are "valued" landscapes
- our own observations

Assessment of landscape character and physical distinctiveness

Northbrook Park is situated about 1.65 kilometres to the east of the current settlement boundary of the village of Bentley. The proposed Site extends to the north and south of the A31. It is within the north eastern part of LCA 3f - Wey Valley in HILCA and LCA 4B - Northern Wey Valley in EHLCA. The Wey Valley is a broad valley with gently rising valley sides through which the River Wey flows. It is characterised by a distinct flat valley floor with permanent pasture and water meadows within the flood plain extending over the river Wey. Woodland is also a feature of the valley floor, often lining the river. Willow trees are characteristic along the river banks.

The setting of the valley is enhanced by the wooded slopes of the Alice Holt Forest to the south and the rising, largely wooded, downs to the north.

Paragraph 4B.20 of the EHLCA states that the overall management objective for the LCA is "to conserve the tranquil, natural character of the Northern Wey Valley, and the individual identity of the small villages set on the gravel terrace above the floodplain. The valley should provide an open rural landscape between the towns of Alton and Farnham. The character of the enclosing valley sides, particularly the downland to the north of the Wey, which form the backdrop to the valley, should also be conserved."

As well as the undoubted attraction of the unspoiled chalk stream valley, there are many historical features and buildings within the Wey Valley, including a number of large and historic houses at points along the northern side of the valley and built to look south over the River Wey. These include within the Bentley Parish, Marsh House, Marelands, Jenkyn Place, Coldrey and Northbrook House itself, which is Grade II Listed

and registered in the Hampshire Register of Historic Parks and Gardens. Although today often separated from the river by the A31, they form part of the historic landscape.

The Valley has historically been an important transport corridor and is traversed by the main A31 road and the Alton to Waterloo railway line. This landscape is therefore appreciated and valued by more people than just the local residents.

In one of his famous Rural Rides, the most famous local inhabitant, the reformer, writer and MP William Cobbett (1763-1835), born and raised in Farnham, includes the following: "The vale between Alton and Farnham is the finest ten miles in England. Here is a river with fine meadows on each side of it, and with rising grounds having some hop-gardens and some pretty woods". Gilbert White, Selborne resident and naturalist, also wrote in his journals about the landscape in admiring terms.

Within the Site the northern valley side leading up from the A31 is cloaked by medium sized arable fields, leading beyond the Site to woodland reaching to the skyline. There are a number of buildings, some modern, around Northbrook House. To the south, the Site includes the River Wey and its adjoining pasture land and water meadows, leading southwards into woodland, again reaching to the skyline. This woodland is the northern boundary of Alice Holt Forest, which is within the South Downs National Park (SDNP), so that the Site is in the setting of the national park.

Apart from one modern building adjoining the eastern boundary of the Site, in use as an equestrian business, the area to the south of the A31 is a well preserved landscape of a meandering river and adjoining woodland, pasture and water meadows. It has a strong rural and physically distinctive character, with an intense sense of the history and the ecology of water meadows and related pasture land. It is fully representative of the tract of this landscape of great natural beauty which stretches the length of the Wey Valley either side of the river. It is shielded from the A31 by a bank of trees along the road. Although today separated by the A31, we see Northbrook House and its parkland garden (Grade II listed and registered in the Hampshire Register of Historic Parks and Gardens) as forming part of this distinctive landscape.

This tract of landscape to the south of the A31 is within the River Valley Area of Special Landscape Quality as proposed in a Report by RPS Watson to East Hampshire District Council dated 8 December 1994, based on its scarcity value, scenic quality, unspoilt character and sense of place. This assessment is as valid today as it was in 1994. It is also within an area of Low Landscape Capacity in the East Hampshire Landscape Capacity Study.

Assessment of public experience of the landscape

From points where roads and rights of way cross the River Wey, there are extensive views of the distinctive and historic riverside landscape to east and west, and especially from the footpath leading east from Turks

Mill as it rises to pass under the railway into the SDNP. The footpath itself, following the river, has great charm, sense of history and tranquillity (in its widest sense), despite the noise from the A31. The roof of Northbrook House is visible at the eastern end, even in summer, making the connection with the historic great houses along the river valley which overlook the river.

In summer there are occasional views into this landscape through the trees lining the A31 and the railway line. In other seasons the views in to this distinctive landscape are more extensive.

Accordingly, taking account of

- **the distinctive and historic landscape, of great natural beauty, adjoining the River Wey**
- **the contribution of the public experience of this landscape from public right of way, the A31 and the railway line, and**
- **the important contribution of the Site to the tract of valley landscape identified in LCA 3f - Wey Valley in HILCA and LCA 4b - Northern Wey Valley in EHLCA,**
- **the close proximity to the South Downs National Park**

CPRE Hampshire considers that the part of the Site which is to the south of the A31, incorporating also the listed Northbrook House and its registered historic park and garden to the north of the A31, is situated within a landscape stretching from Farnham to Alton along the River Wey which has demonstrable attributes which raises it above the ordinary, such that it is a "valued landscape" to which NPPF paragraph 170(a) applies.

Clearly, use of that part of the Site for employment buildings would destroy the continuity of this valley landscape extending from Farnham to Bentley along the River Wey, as well as that part of it within the Site. The public experience of this distinctive and historic landscape of great beauty would be much diminished. The relative tranquillity and intrinsically dark landscape to be experienced within this part of the continuous tract of valley landscape would be destroyed by appearance of large buildings, traffic and lighting

CPC Responses

clerk@crondall-pc.gov.uk

Fri 27/09/2019 13:56

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (1 MB)

CPC Response to EHDC Large Development Site Consultation_v0.2_19Sept2019.docx;

Please find attached the responses of Crondall Parish Council to the East Hants DC Large Development Sites Consultation.

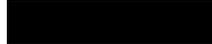
Please do not hesitate to contact me should you require any further clarification.

Regards



Clerk to Crondall Parish Council

clerk@crondall-pc.gov.uk



Crandall Parish Council
PO Box 623
Farnham
Surrey
GU9 1HB

Contact: [REDACTED]
Telephone: [REDACTED]
e-mail: clerk@crondall-pc.gov.uk
Ref: Large Sites Consultation

Date: 24 Sept 2019

Chief Executive
East Hampshire District Council
Draft Local Plan Consultation
Penns Place
Petersfield
GU314EX.
by E-Mail to localplan@easthants.gov.uk

Dear Mrs Gill Kneller

East Hampshire DC Large Development Sites consultation September-October 2019

Crandall Parish Council (CPC) notes the consultation by East Hampshire District Council (EHDC) of a Large Development Sites consultation. CPC would like to raise the following points:-

- The plan features a range of sites spread across the “developable” areas of the EHDC area (as they are constrained by the South Downs National Park in the central areas). Site 1 (Northbrook Park) is particularly isolated in development terms from the major settlements of EHDC and would impact greatly on neighbouring Authorities.
- Northbrook Park is NOT a sustainable location for the following reasons:-
 - The Site is distant from sustainable transport options and thus all new residents will be using cars.
 - Not all residents will find employment at the proposed associated employment site, thus the development will create significant traffic outflows (to secondary schools and other employment sites) alongside vehicular inflows to the employment site.
 - The site is socially isolated from major shopping and recreational facilities in Farnham and Alton.
 - The very grave concern is that much of this additional traffic will inevitably pass through the narrow lanes and villages of Crondall and adjacent parishes. These lanes are TOTALLY unsuitable for large traffic volumes and in particular many of the very narrow streets of Crondall village are single-track with passing opportunities only (See Annex A for examples). This already causes a significant build-up of traffic, with queues during peak times, frayed tempers and delays. Alongside frequent jams caused by HGVs flouting signed restrictions.
 - Existing and planned developments in and around the western edge of Farnham will already contribute to through traffic in Crondall and the addition of Northbrook Park will make an already unsustainable situation intolerable.
 - p93 of “EHDC Background Paper – Large Development Sites” shows that Northbrook Park has 9 “red” assessments – the most of any proposed sites and is hence the weakest.
- The provision of infrastructure is noted, but at such an isolated location a 2-form entry primary school will struggle for viability. Crondall village has ~ 600 dwellings and only just sustains a single form primary school with local children. Northbrook Park would struggle more, as the demographics

changed: children moved to secondary school while residents remained in their homes and others were unwilling to make long car journeys to access the school.

- A new settlement in open countryside in the Northern Wey Valley will significantly change the pattern of development in the area – contrary to NPPF para 170. This is ground that rises above the existing A31 and the site would be highly prominent in an ancient landscape. This is “National Character Area Level Landscape Features (England)” code number 120 (Wealden Greensand) and 130 (Hampshire Downs).
- This is a highly sensitive site with close proximity to ancient woods. We also note from the DEFRA “MagicMap” website that the site exhibits the following negative indicators for development:-
 - SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)
 - Drinking Water Safeguard Zones (Surface Water) – a particular concern with run-off from a major development.
 - Woodland Priority Habitat Network and Improvement area, Priority Habitat Inventory - Deciduous Woodland. None of these designations is improved by development
 - Priority Species for CS Targeting – Lapwing
- The selection of sites on administrative boundaries (i.e. the EHDC boundary with Hart and Waverly) is particularly unhelpful as the usual analysis is not applied in a measured manner across the full impact area of the development, but is “skewed” towards the host district, with failure to adequately assess the potential significant impacts across the boundaries.
 - We see no discussion of any travel impact assessments that consider the cross-boundary issues.
 - The location makes low-carbon access (walking & cycling) to remote for anything but highly localised services.
- The imposition of a site contrary to the made Neighbourhood Plan in Bentley appears contrary to the spirit of localism and accepted policy norms.
- The need for EHDC to achieve a planned 2,000 new houses and while some modest development in the north-east areas of the District might be demonstrated, this should be more closely linked with Tier-1/2 settlements and existing infrastructure and undertaken on a more measured scale. It would appear that EHDC has a good selection of high quality and sustainable options around larger towns and these should be prioritised.

Crandall Parish Council requests that full consideration is given to the above points prior to the proposed revision of the Local Plan.

Yours sincerely,


Clerk, Crandall Parish Council

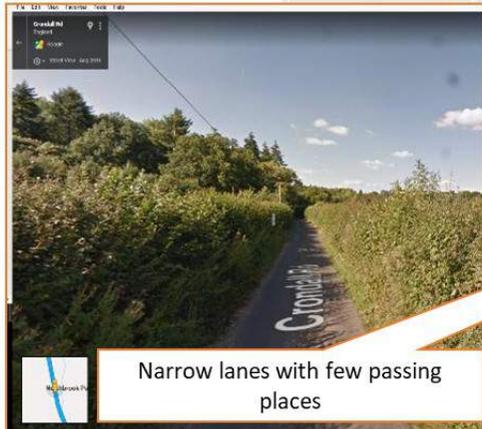
CC  - Hart District Council
Bentley Parish Council

Annex A – M3 Access Routes

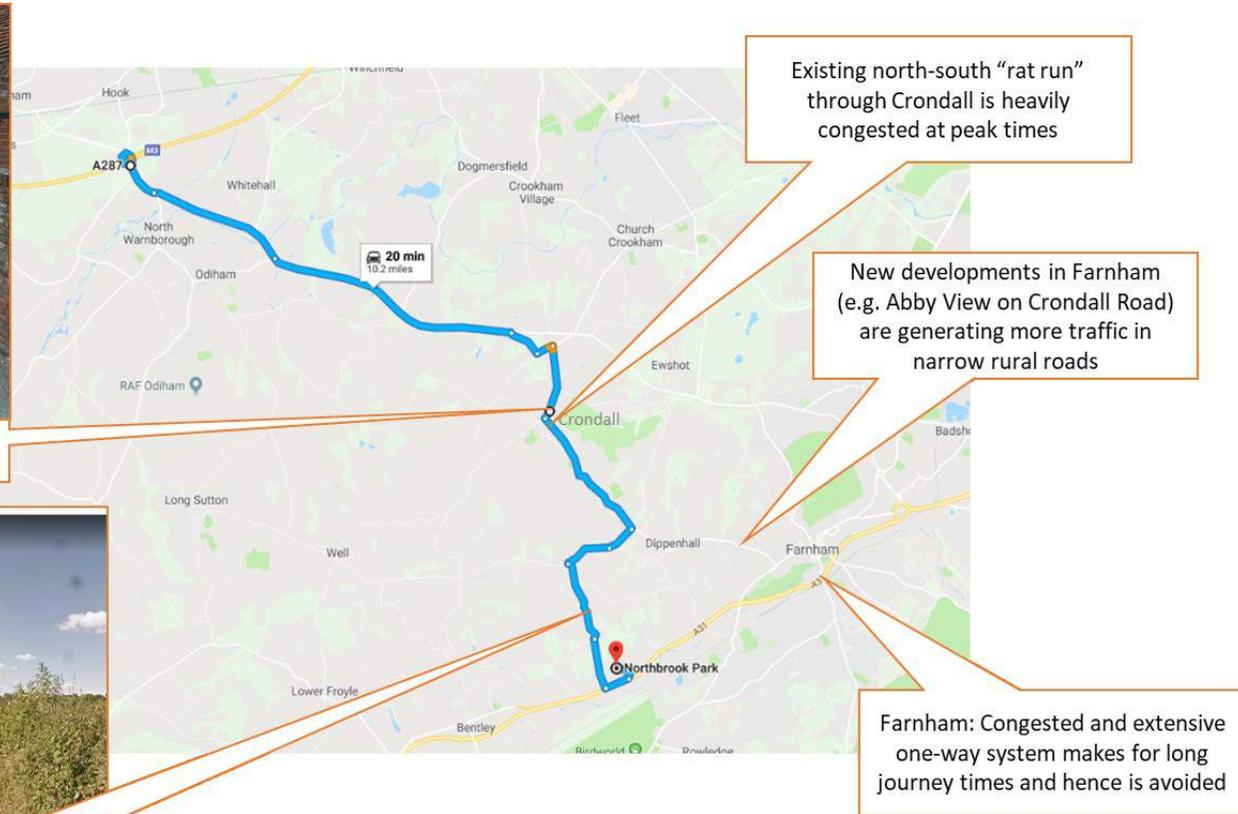
The following access route to the M3 has been plotted for information. Many new residents would need to access the northern direction for work etc. The access route to the M3 has been plotted for information. While other routes will be available, human nature is to use the most expedient and drivers are now almost universally directed by their SatNavs set to “quickest” route. The narrow lanes (especially Crondall Lane slightly to the west of the Northbrook Park site off the A31) and village streets (Dippenhall St, Crondall) are illustrated by the following images, highlighting the **very** narrow nature of these roads.



Crondall: Very narrow streets, parked cars and sharp blind junctions



Narrow lanes with few passing places



Existing north-south “rat run” through Crondall is heavily congested at peak times

New developments in Farnham (e.g. Abby View on Crondall Road) are generating more traffic in narrow rural roads

Farnham: Congested and extensive one-way system makes for long journey times and hence is avoided

EHDC Local Plan Large sites consultation

[Redacted]

Mon 23/09/2019 17:03

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (67 KB)

EHDC Large development sites consultation questionnaire 210919.docx;

Please find attached my comments for the above consultation.

My details are as follows:

[Redacted]

A Cycling UK local campaigner

██████████
██████████
21st September 2019

East Hants District Council
Penns Place, Petersfield, Hants.

EHDC Large development sites consultation.

Thank you for the opportunity to comment on the EHDC Local Plan 'Large development sites consultation. Comments focus on sustainable travel and the East of Horndean sites and includes a few general points.

Question 1: Comments on proposed uses: A case exists for more low & middle value and social housing in the Portsmouth Conurbation. Documents don't indicate why this developments should be in East Hants as opposed to Fareham, Havant, Winchester or Chichester districts. East of Horndean sites on the edge of the Portsmouth Conurbation and the South Downs National Park and close to A3(M) junction 2, are in a prime location with easy access to city, coast & Downs. The two proposed sites would add about 2,000 dwellings giving about a 50% increase in population dependent on Horndean. That constitutes a large change. Doubling employment is easier to justify. The proposals, particularly for the first site will increase car use but restrict sustainable transport between Horndean and Havant at a time when there is considerable effort underway to increase sustainable transport across the Portsmouth Conurbation. Primary problems include: **a)** A lack of a good cycling connection south, **b).** The failure to work with Havant BC to open up BW24/22 for cycling. **c).** The proposed walking & cycle route across the A3(M) from the first site to Horndean TC will block access to BW24/22 from the north. **d).** Inadequate proposals for cycling from site to Horndean Junior School & into Horndean Centre. **e).** Increase in traffic without compensations for sustainable transport will be another step in reducing cycling in the area. These issues are explained below

Question 2: Infrastructure required: Careful integration of the sites into the community and countryside with a substantial change from motor traffic to sustainable transport being essential if the area is not to be swamped with vehicles and pollution, probably destroying opportunities for local cycling, reducing walking opportunities and increasing pollution resulting in health and well-being issues plus more global warming. Substantial improvements are needed for the first site before a decision to develop the 2nd site is taken.

Infrastructure for sustainable travel:

1. **Bus routes:** The Number. 8 bus route from Horndean to Portsmouth works well, is well used and is a valuable asset to the community. The 37 Bus route from Petersfield to Havant via Horndean, is less valuable. Its wandering route, takes a long time. Due to a shortage of school buses some services are overcrowded making it inaccessible to other users. It's quicker to cycle between Horndean and Havant Centre than to use the 37 bus.
2. Between 2004 & 2009 the **A3 bus corridor** construction, mainly due to improvements in Portsmouth, enabled a quicker **route for buses**. **Cycling along the route between Horndean & Waterlooville** reduced to less than half its former numbers even though the specification required cycling to increase. Some cycling moved to parallel routes but the remaining total has noticeably reduced. Action is needed to reverse this trend.
3. **Cycling to schools:** In the 1990's **Horndean TC** was the Sustran's national demonstrator site for cycling to school. Good facilities were installed at the school and have since been upgraded. 25 years later the only **good** cycle lanes to the school are shared pavements on Barton Cross & Victory Avenue. The shared pavement alongside the A3 from Causeway Junction to Cowplain Centre is obstructed by street furniture, priority changes and parking causing friction with pedestrians plus risky junctions like with Lovedean Lane and no cycle priority at junctions. The route is slow to cycle and feels unsafe. Even so many children cycle this way to Horndean TC, although probably only a small part of the potential numbers who might use a well-designed route. A shared pavement route from Havant Road to **Horndean Junior School** has two risky road crossings, one across the A3. The pavement on Havant Rd., close to Portsmouth Road is not available for cycling even though at peak time traffic queuing occurs with many vehicles cutting in on cyclists & making cycling risky.

4. Until about 2008 the **B2149** alongside the site hosted lots of cycling, including commuting, mainly to & from East Havant / Emsworth. By 2015 cycling had stopped due to increased volume and speed of traffic. Very few people now cycle this road this even at quiet times of day. **Proposed cycling links south through Havant Thicket & the Reservoir site** could help but need connecting to the Petersfield Road & Hermitage Stream cycle routes south entirely on sealed surface tracks to make them usable cycle commuting.
5. **NCN22 - NCN222 link, from Horndean to Rowlands Castle**, is probably cycled as much as any road in the Horndean area. Mainly from Horndean/Clanfield to Chichester/ Emsworth. At busy times queuing on Havant Rd., close to Portsmouth Rd., where vehicles cut in on cyclists make cycling feel risky. The pavement is wide but shared use but has not been proposed for cycling.
6. **Bridleway 24/22** could enable more cycling from the two sites than all other opportunities combined. It's not mentioned in applications for the first site or in documents for the 2nd site. The route south has an A3(M) bridge in a good state of repair. The track surface is very old Tarmac that could easily be repaired. Havant BC have planned a cycle link from BW22 past Padnell Grange to the cycle route into Havant Town Centre, Dunsbury Park Business and Cowplain & Waterlooville Town Centres.
7. **The second site is a long walk from Horndean TC but is within easy cycling distance.** No public transport is proposed. One of the proposed lights crossings of the north bound slip roads to the A3(M) at J2, has short sight lines and wouldn't be appropriate, or considered safe by most people, for children to cycle. An easier option from the site would be via the BW24 bridge and BW24a onto Dell Piece West with a single crossing of Dell Piece West with better visibility. About 700m of deep rutted clay surface on BW24a would need rebuilding with a sealed surface for a traffic free walking and cycling route.

Question 3: Possible constraints to development: It's hard to see how a proposed development with housing up to the edge of Havant Thicket, a SINC and prime local biodiversity site, could be justified. It hosts several protected species needing open space around the woodland. At the south of the Thicket development has been kept well clear of woodland. As a minimum a larger gap between housing and SINC is likely to be needed. Even more damaging is the greater reliance on polluting vehicles instead of sustainable transport that come from arrangements agreed for the first site. This might limit the size of the 2nd site. The need to limit global warming could result in legislation for radical improvements to cycle infrastructure well before 2036 especially in urban areas such as this. In this context direct routes on sealed surfaces away from motor traffic are needed for cycle commuting. ('Walking & Cycling Statistics England 2017 says 62% of adults aged 18+ agreed that, "It is too dangerous for me to cycle on the road."')

Question 4: Opportunities & benefits: If good quality cycling infrastructure was provided as suggested in this response improvements in local health & well-being and a reduction in pollution including noise is likely. There should also be slower increase in pressure on local centres from car use.

Questions 5: Cross boundary considerations: Horndean located in East Hants district, is socially and economically part of the Havant/Waterlooville area but the town centres are progressively becoming choked with traffic. Currently cycling links between Horndean & the two town centres are poor. The lack of any improvement to cycling from the first E of H development will almost certainly further reduce cycling in the area. Consequentially the second site might not be viable unless the situation is rectified.

Question 6: Achievable? See question 3 above

Question 7: Several sites are underway in Havant, Fareham & bordering Havant in Chichester district. Little information on potential sites seems to be available.

Question 8: Assessment: Nine sites would serve mid Hampshire/Surrey areas. East of Horndean, would provide housing and employment for Hampshire & West Sussex coastal areas. Comparing East of Horndean to the other sites only adds confusion.

Question 9: Relationship between Large development sites & the draft local plan.

The Local plan requirements should be changed to enable:

1. A more meaningful method of selection of sites to meet the needs of local communities with better information on activities in neighbouring districts within conurbations is needed. Present boundaries seem to cause thought blocks. This might help the case for a South Hampshire Unitary District.
2. How the district might more effectively co-operate with neighbouring councils to encourage walking & cycling across boundaries especially in urban areas.
3. The documents contains comments on Community and Wellbeing suggesting there should be opportunities for leisure walking outside the community for exercise. It doesn't address more important points including; **a)** How residents can exercise as part of their normal daily activities. This might occur in cycling or walking to work or school that is not meaningfully addressed in the documents circulated or in the proposals for the first E of H site. **b).** How while they are undertaking these activities they can stay safe from contact with motor vehicles that might result in injury or illness from pollution.
4. Cycling infrastructure must comply with national guidance enabling safe & healthy routes that will encourage more users and help to reduce health and well-being problems. Quick, cheap fixes to cycle infrastructure as seen locally don't help.
5. Planning applications for large sites should define cycle routes to large employment sites at least up to about 10km away. See HCC Cycling Strategy chapter 2 for supporting data.
6. Each large development should include a pavement with sealed surface, away from traffic on which residents including children could learn to cycle.

██████████
A Cycling UK local campaigner

Large developments sites consultation

[Redacted]

Mon 14/10/2019 19:52

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [Redacted]

 1 attachments (91 KB)

Letter to Simon Jenkins re the Draft Plan 141019.doc;

Dear Sir/Madam

I enclose as an attachment the response from Energy Alton to the consultation on this aspect of the draft plan.

Yours sincerely

[Redacted]

Chairman
Energy Alton

Mr Simon Jenkins
Director of Regeneration and Place
East Hampshire District Council

14th October 2019

Dear Simon

This letter is the response from Energy Alton to latest EHDC consultation on the large sites to be included draft Plan. It follows our response to the draft plan proper in the spring of this year.

We must repeat our very strong message to EHDC that this new plan has to reflect the climate emergency announced by East Hampshire this summer and the need to rapidly move to zero carbon emissions by 2050.

Since the publication of the EHDC draft Plan we have had clear warnings from the Committee for Climate Change in May of this year and the Special report from the IPCC on global warming to 1.5° published recently on the 8th October. Limiting global warming to 1.5° requires a 45% decrease in net emissions by 2030.

So, we welcome the statement made at its meeting on 18th July. The Council 'pledged to renew its environment and energy strategy with actions that will reduce its carbon emissions and promote sustainable business practices. The strategy will ensure that all council services focus on environmental issues as part of everyday decision-making. It will promote sustainable building standards through the council's planning and building standards work and will influence and collaborate with other public bodies to deliver the UK government Climate Change Act target to reach net zero carbon emissions by 2050.'

Therefore, the current plan has to be reworded to introduce higher building standards that demonstrate a rapid pathway to net zero carbon buildings. Fortunately, the increased urgency to act is matched by more opportunities to do so.

The cost of renewable energy has fallen, technology has advance especially in battery storage and modern building techniques to achieve zero carbon emissions are tried and tested. The Energy Saving Trust in its Clean Growth Plan estimates that the additional cost of building to a zero-carbon standard was £3700- £4700 for a semi-detached house or 2.6% of the value of a home (in 2014). This is a small percentage given the significant benefits that come with being 2050 ready.

The EST states 'A new-build home built to a 2050-ready standard will deliver direct benefits that people will be willing to pay for. These homes will be more comfortable, cheaper to run and offer new residents the knowledge they are helping tackle climate change. Housebuilders can easily market these benefits to homebuyers, thus offsetting any additional costs in supplying the homes.'

And yet throughout Alton hundreds of houses are currently being built to emit carbon well beyond 2050. These will require expensive retrofit of carbon reducing or offsetting measures for homeowners, the council or both to comply with government policy. Worse still for developments under consideration such as the Cala Homes development of the Coors Brewery site and the McCarthy and Stone redevelopment of the former courts and Police station site, there is no mention at all of carbon emissions, renewable energy or sustainable building in either of the developers' current proposals. It features so low in their view of what is importance it merits no comment. How damning is that?

We now call upon EHDC to make up for lost time and bring in challenging building standards that rapidly move the District to zero carbon emissions for new homes. It is not constrained by public overarching policy as previously thought. The Governments response to the consultation on the National Planning Policy Framework (NPPF) has clarified that in a statement on July 24th of this year.

There is ample guidance on what needs to be done such as the UK GBC paper on ‘Driving sustainability in new homes – a resource for local authorities’ published in 2018. Indeed, the document lists the authorities that are taking a policy lead across the country.

And now HM Govt is consulting on this very issue – ‘The Future Homes Standard 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings’ published this month. To quote from the introduction:

As part of the journey to 2050 we have committed to introducing the Future Homes Standard in 2025. This consultation sets out what we think a home built to the Future Homes Standard will be like. We expect that an average home built to it will have 75- 80% less carbon emissions than one built to current energy efficiency requirements (Approved Document L 2013). We expect this will be achieved through very high fabric standards and a low carbon heating system. This means a new home built to the Future Homes Standard might have a heat pump, triple glazing and standards for walls, floors and roofs that significantly limit a ny heat loss. We need to help the industry reach a position where it can deliver in 2025. We propose introducing in 2020 a meaningful but achievable uplift to energy efficiency standards as a stepping stone to the Future Homes Standard. The intention is to make new homes more energy efficient and to future-proof them in readiness for low carbon heating systems.

In conclusion

EHDC has a duty to radically revise the draft plan as it relates to future building standards to fully reflect the climate emergency. It should set standards that can demonstrate a progressive movement to net zero carbon for all new building.

We call on the Council to halt the approval of all new housing developments pending the introduction of these new standards. The climate emergency justifies this action.

Yours sincerely

[REDACTED]
Chairman
Energy Alton

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

RE: Local Plan Large Development Sites Consultation (3 Sept - 15 October)

Wed 30/10/2019 11:00

To: Stevens, Heather <Heather.Stevens@easthants.gov.uk>

Cc: [REDACTED]

Hi Heather,

I appreciate our response to this consultation is late, however we would still like to provide comments which you may choose to consider.

Groundwater

A number of the sites are directly on or near a Ground Water Source Protection Zone's.

Why is groundwater important in East Hants?

A large proportion of East Hants District Council's area is above a principal aquifer, with a significant amount being located within a Groundwater Source Protection Zone (SPZs). In order to protect drinking water supplies the Environment Agency (EA) may seek to, limit or control certain activities in SPZ's where the risk from pollution is high.

East Hampshire is highly dependant on groundwater resources for its drinking water supplies. Groundwater also provides baseflow to its rivers and supports habitats. We need developers to understand and consider the pollution risks associated with their sites and for them to demonstrate that groundwater can and will be protected from pollution. This may mean that in certain areas additional controls are needed to enable development to proceed. We may, for example, ask developers to look at alternative methods of surface water management to avoid making discharges into the ground or to re-consider foundation design in order to mitigate risk.

A number of SPZs are located in the East Hants area including the Bedhampton and Havant springs SPZ, which supplies drinking water to over 200,000 people. The springs are reported to be the largest group of springs used for this purpose in Europe. The SPZ for the Bedhampton and Havant Springs is large and complicated. Any development within it needs careful consideration as the risks to drinking water supplies can be high and consequences irreversible.

What are Ground water Source Protection Zones?

The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater.

Groundwater Source Protection Zones indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. Designated to protect individual groundwater sources, these zones show the risk of contamination from any activities that might cause pollution in the area. In this context they are used to inform pollution prevention measures in areas which are at a higher risk and to monitor the activities of potential polluting activities nearby.

The EA divides groundwater source catchment into three zones. SPZs are identified depending on how the groundwater behaves in that area, what constructions there are to get the water into the public water supply and the process for doing this:

Inner Zone (SPZ1) – Defined as the 50 day travel time from any point below the water table to the source. This zone has a minimum radius of 50 meters. These zones represent areas where groundwater (including drinking water supplies) is at its greatest risk from potentially polluting activities.

Inner Zone (SPZ1C) – intended to show areas where we may seek to limit or control 'subsurface activities' only

Outer zone (SPZ2) – Defined by a 400 day travel time from a point below the water table. The previous methodology gave an option to define SPZ2 as the minimum recharge area required to support 25 per cent of

the protected yield. This option is no longer available in defining new SPZs and instead this zone has a minimum radius of 250 or 500 meters around the source, depending on the size of abstraction.

Outer zone (SPZ2C) – intended to show areas where we may seek to limit or control ‘subsurface activities’ only

Total catchment (SPZ3) – define as the area around a source within which all groundwater recharge is presumed to be discharged at the source. In confined aquifers, the source catchment may be displaced some distance from the source. For heavily exploited aquifers, the final Source Catchment Protection Zone can be defined as the whole aquifer recharge area where the ratio of groundwater abstraction to aquifer recharge (average recharge multiplied by outcrop area) is >0.75 . There is still the need to define individual source protection areas to assist operators in catchment management.

How can the East Hants Local plan help to protect Groundwater?

The local plan can help protect the integrity of ground water by including site specific policies and development policies to ensure developers consider risks upfront and can demonstrate that development will not impact groundwater quality. This should include policies on the management of surface water.

East Hampshire District Council can access Source Protection Zone data via our Data Share service, registering as a WFD Co-deliverer to access data on local water bodies:

<http://www.geostore.com/environment-agency/>

Further information

Groundwater protection position statements

The Groundwater Protection Position Statements provide LPAs, developers and land owners, with the framework to our approach to groundwater protection and management. It covers the legal framework we work within and the approaches and positions we take to regulate and influence certain activities and issues:

[Groundwater protection position statements](#)

River Basin Management Plans (RBMPs)

The RBMPs are the over-arching source of information on the water environment and the actions we and others are undertaking. The NPPF states in Para [165](#) that RBMPs should be used as evidence on which to base planning decisions. This promotes the use of “up-to-date information about the natural environment” which should be useful to inform the action needed to improve water quality in Local Plans. All public bodies, including local authorities are required to “have regard to the River Basin Management Plan and any supplementary plans in exercising their functions”. More information on the Water Framework Directive: GOV.UK at: <https://www.gov.uk/government/policies/improving-water-quality/supporting-pages/planning-for-better-water>.

Waste Water Infrastructure

- We note a number of sites do not appear to be served by a mains- sewer. We expect developments to connect to the public sewerage system wherever it is reasonable to do so.

The provision of infrastructure for wastewater is listed as one of the strategic priorities that should be considered in Local Plans (NPPF paragraph’s [20-27](#)). We would encourage LPAs to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans (see NPPF paragraphs [16-23](#)). LPAs should also work with providers to assess the quality and capacity of infrastructure for water supply, wastewater and its treatment.

Flood Risk

- A couple of the sites appear to be located within a flood zone. In accordance with the National Planning Policy Framework (NPPF) [paragraph 14, footnote 9] inappropriate development in locations at risk of flooding should be restricted. This should be done by directing development away from areas at highest risk (NPPF para. 155) through the application of the Sequential Test (NPPF para. 158). Paragraph 022 of the Planning Practice

Guidance requires that through the Sequential Test and Sustainability Appraisal process that where other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications for any decisions to allocate land in areas at high flood risk given in the Sustainability Appraisal report.

We advise emerging local plan clearly demonstrates with evidence that there are no reasonably alternative sites in Flood Zone 1 (lowest flood risk) and that there is an overriding need to provide development in FZ 2 and 3. i.e. economic regeneration.

We hope these comments have been useful.

Many thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] | Principal Planning Officer Sustainable Places West | Solent and South Downs Area |
Environment Planning and Engagement | Environment Agency | Romsey | Canal Walk | Romsey | SO51 7LP |
Tel: 02084745838 | [REDACTED]@environment-agency.gov.uk or PlanningSSD@environment-agency.gov.uk

From: Stevens, Heather [mailto:Heather.Stevens@easthants.gov.uk]
Sent: 02 September 2019 14:43
To: [REDACTED]@environment-agency.gov.uk>
Subject: Local Plan Large Development Sites Consultation (3 Sept - 15 October)

Dear [REDACTED]

The Local Plan Large Development Sites consultation starts tomorrow, and all the information is available online at <https://www.easthants.gov.uk/large-development-sites-consultation>. The Consultation runs until 15 October.

To make it easier to see the location of the sites, I've attached a couple of maps that show all 10 sites. With the centre of our district being covered by the SDNP, 9 of the sites are in the northern part of our district (shown on one map), and 1 site is in the southern part in Horndean (shown on one map). Each site is capable of accommodating at least 600 homes and other supporting uses.

When you've had chance to consider the consultation material, let us know if you think there are any specific issues that you would like to discuss, and we would be happy to meet with you.

The questionnaire includes the questions;

- What infrastructure is required to support the proposal and when?
- Do you know of any other constraints to developing the site?
- What opportunities and/or benefits do you think the proposal could bring?
- What are the cross boundary considerations and the potential implications?

Many thanks,
Heather.

Heather Stevens
Principal Policy Planner
East Hampshire District Council
Penns Place, Petersfield GU31 4EX
Telephone: 01730 234065

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Large Development Sites Consultation

[REDACTED]

Mon 14/10/2019 10:35

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 2 attachments (410 KB)

EHDC Large Development Sites Consultation Letter 14 10 19.pdf; EHDC Local Plan Consultation Letter 18 03 19.pdf;

[REDACTED]

As a member of The Farnham Society Planning Committee I attach a letter confirming the reasons that the committee has objected on behalf of the Society together with a copy of the letter dated 19 March 2019. I fully support the contents of both these letters.

I feel that alternative more suitable residential large development sites exist within the district.

Please confirm receipt of this email if automated receipt emails are not being dispatched.

[REDACTED]



14 October 2019

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

Dear Sirs

East Hampshire District Council Large Development Site Consultation

This letter is The Farnham Society's response to consultation on the Large Development Site Consultation as part of the East Hampshire District Council draft Local Plan.

We attach a copy of our consultation response to the draft Local Plan dated 19 March 2019, the contents of which remain wholly material to this consultation. This further response is submitted on the basis that all issues included in the attached letter are deemed to be included within its scope and that this response will be read in conjunction with the Society's letter dated 19 March 2019.

This response relates to the Northbrook Park site, one of the ten sites under consideration. The other sites included within the consultation are

- Whitehill & Bordon
- Chawton Park Farm
- Land East of Horndean (Hazelton Farm)
- Land south east of Liphook
- Neatham Down
- Four Marks south
- Land west of Lymington Bottom Road, South Medstead
- South Medstead
- Land south of Winchester Road, Four Marks.

The committee remain concerned about the inclusion of the Northbrook Park site in the draft Local Plan and confirm its **objection** to it, more so now that additional and more appropriate sites have come forward in this consultation.

The proposals have changed, so for clarity we reiterate the proposals included within the leaflet presented by representatives of the developer at the drop-in events.

Proposals

- 800 homes at a gross density of 32 dwellings per hectare including 40% affordable housing
- Self-build plots, specialist homes for disabled and warden-controlled accommodation
- 2.6 hectares of employment land
- Provision for Gypsy, Traveller, and Travelling Show people pitches / plots;

- New two form entry primary school
- New community hub and commercial infrastructure, recorded as including village hall, village pub, village shops and work hub with coffee shop, meeting rooms, conference facilities and broadband
- Green infrastructure including 2.5 hectares of public open space incorporating recreational play facilities and 15.4 hectares of SANG

The land to the east of the proposed site, which is on the Surrey side of the boundary is in the same ownership as the proposed site. It is therefore realistically the likely extension to justify the infrastructure proposed. Members of the team representing the owners and promoting the site were unable to confirm that there was no intention of increasing the size of the Northbrook site to extend into Surrey, Waverley Borough and Farnham settlement.

We reiterate one of our other serious concerns 'The site is closer to the main Built-up Area Boundary of Farnham than Bentley's. Due consideration of the impact on Farnham should be made.

Our letter dated 19 March 2019 records the reasons that the site was rejected on the Surrey side of the boundary.

We would add and reiterate:

1. The Northbrook Park site is the only one of the ten sites located away from an existing town or settlement.
2. The formation of effectively a new village on a greenfield site should be considered as a sequentially last option for providing dwellings and facilities. Housing and other facilities should be located immediately adjacent to existing settlements to maximise sustainability especially now that the true effect of global warming is becoming increasingly evident.
3. The proposals will significantly diminish the character of the area between Bentley and Farnham, destroying the rural character of the A31 corridor.
4. The principle impact of the proposed development would be seen by a vast majority of East Hampshire residents as affecting only Bentley and the neighbouring town of Farnham, minimising impact on a majority of the East Hampshire district. Politically it is probably the most attractive option for East Hampshire. Strategically it is the worst option for Farnham and west Surrey.
5. All the other sites are strategically better located than Northbrook Park.
6. The development of Northbrook Park on the Hampshire side of the boundary, let alone both sides, would be unacceptably disproportionate. The location is significantly less sustainable than other locations put forward.
7. Growth resulting from the development of Northbrook Park would be out of character with the area and Bentley itself. Growth to accommodate the dwellings required by Government policy has to happen but in the right place.
8. The proposals would endanger the neighbouring ancient woodland and biodiversity of the area.
9. Development of the Northbrook Park site would increase the likelihood of further development along the A31 corridor both on the Hampshire side and Surrey side of the boundary over and above the Northbrook Park development, whether limited to the current 800 dwellings included in the consultation or the currently rejected proposed dwellings on the Surrey side.
10. Any development at Northbrook Park would not prevent further development in Bentley. In fact, in our opinion, it is likely that other developers would interpret the development of Northbrook Park as a positive sign that further development in Bentley would be acceptable, the sites viewed as windfall sites.

11. Bentley would lose its unique character with Hampshire as a result of the development of the scale proposed at Northbrook Park.
12. Residents of Bentley would, we would have thought, preferred to see and support a number of small developments of under ten dwellings in areas attached to the existing settlement.
13. The developers have revised their proposals to maximise the attractiveness of the site to all but local Hampshire residents and residents of Farnham.
14. Congestion in Farnham resulting from the addition of either the development proposed on the Hampshire side of the county boundary or both sides of the boundary could be unsustainable.
15. The developer proposes the introduction of a green energy bus service running 'approximately' every 30 minutes. This service would more than likely require two vehicles to operate during peak hours as result of congestion approaching and within Farnham when traveling half a mile can take ten to fifteen minutes.
16. It is likely that demand for seats on the bus service to Farnham station would outstrip capacity at peak hours, 7am through to 8am and 6pm through to 7.30pm. Northbrook Park residents working in London would travel by car to ensure continuity of their journey, especially at the end of the day.
17. The proposals fail to indicate the longevity of the bus service. The service would be financially challenging for many years, until completion of the whole development, if undertaken. It could also become financially unviable in the future leading to its cancellation. One assumes that the developer proposes to operation the service between, say 6am and midnight seven days a week otherwise occupants will favour organising their own transport. What control would Farnham have should the developer decide to reduce or cancel the suggested bus service with control retained by East Hampshire District Council rather than by a Surrey located Council.
18. The County, Borough and Town Councils are currently preparing a Strategic Plan for Farnham which could involve pedestrianisation and other changes to vehicle routes within the town. Details are currently not available. Operating the proposed bus service as proposed could be challenging.
19. The A31 so called bypass particularly the Hickley's Corner junction would be unable to accommodate the likely increase in traffic movements. The Coxbridge roundabout and the Shepherd and Flock roundabout would similarly probably be operating at over capacity for significantly increased periods. Traffic currently queues hundreds of yards in increasingly longer rush hour periods at all these junctions before a substantial number of forthcoming new developments both within and surrounding Farnham in Surrey become occupied, including Coxbridge Farm (350 dwellings) let alone those in Aldershot, Bordon and Farnborough.
20. Farnham has 'taken' 2,780 new dwellings in its Regulation 16 Neighbourhood Plan. The addition of a further 800 dwellings within two miles of Farnham would be unsustainable and cause significant issues to infrastructure which would not be supplemented by the development.
21. Other infrastructure requirements will also be swamped by occupants' requirements for facilities, schools, doctors and dentists surgeries and most importantly railway capacity. Train services during peak hours are already challenging before occupancy of developments approved and under construction within and surrounding Farnham.
22. No health facilities are proposed within the Northbrook Park proposals which would result in over capacity of existing surgeries both in Bentley and in Farnham.
23. It is likely, reviewing the developers proposed timescale, that up to nearly half the houses could be occupied before the proposed new two-form entry primary school is operational. During this period primary school children would need to be transported to and educated at existing schools which are close to capacity. Proposed transport facilities fail to accommodate capacity There are no facilities for secondary school education.

24. The proposals included within this consultation indicate a reduced area allocated for employment use, 6 hectares reducing to 2.6 hectares. increasing the likely number of occupants travelling along the A31, increasing congestion at the three junctions referred to above. The Northbrook Park site becomes increasingly unsustainable.
25. The developer's proposals fail to indicate that employers will occupy employment space mitigating Northbrook Park occupants needing travel to work. The coordination of availability of employment space and dwellings is questionable.
26. The development of Northbrook Park would have significant adverse effects on Bentley and Farnham which are impossible to evaluate as a result of the accelerating changes in cultural and social behaviour.
27. The question of flood risk has been side-lined, considered unimportant or dismissed. The impact on Farnham appears not to have been considered.
28. No proposals suggest or propose any investment in Farnham or the A31 other than a new cycleway linking the development to Farnham within Surrey where significant adverse effects will result from the development.
29. Occupants will still be required to travel, by car, to Farnham, to undertake their food shopping. Arguably although occupants could take the bus or cycle to Farnham, they would be unable to transport sufficient quantity back to warrant the journey to the shops.
30. Air quality is an increasing concern in Farnham. The development would increase vehicle journeys and increase pollution within Farnham's Air Quality Management Areas. There is no acknowledgement or reference to air quality within the developer's documentation. (Our letter of 19 March 2019 refers).
31. The site would not appear to lend itself to easy access to utility services, the illustrative plans being unclear. There is no reference to drainage.

As previously recorded, please refer to our letter dated 19 March 2019, copy attached.

We are convinced that one or more of the sites being put forward as part of the consultation are more sustainable within the District, notably in Alton, Four Marks or Whitehall & Borden. The Northbrook Park site would cause irreparable damage to the area, would destroy Bentley and have a severe impact on Farnham.

Yours faithfully


On behalf of THE FARNHAM SOCIETY Planning Committee

Enc Copy of The Farnham Society Planning Committee's letter dated 19 March 2019



THE FARNHAM SOCIETY



18 March 2019

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

Dear Sirs

East Hampshire District Council draft Local Plan Consultation

This letter is The Farnham Society's response to consultation on the local public consultation on the East Hampshire District Council draft Local Plan. Formed in 1911 The Farnham Society is one of the country's largest and oldest conservation and amenity societies committed to preserving and enhancing Farnham's cultural and built heritage. The members, currently approximately 650, primarily live in Farnham Surrey and generally feel very strongly about the aims laid down in the Rules of the Society which include maintaining the quality of life for future generations of its residents, considering issues including protecting the environment, traffic management and air quality. This letter reflects the concerns of the Society's executive and planning committees together with the membership as a whole.

The draft Local Plan seeks responses to the following questions within Section 4. Planning for places,

Consultation questions

CQ9. What infrastructure would you like to see delivered as part of the site allocation?

CQ10. Are you aware of any issues relating to the delivery of this site allocation, including any potential costs that could impact on viability?

CQ11. Do you have any comments on when the site will be developed (including appendix 2 – housing trajectory)?

CQ12. Do you have any other comments on the site allocation?

The committee has focused purely on the site Land at Northbrook Park allocated Site SA21. We are concerned about the inclusion of this site in the draft Local Plan and reluctantly **object** to the inclusion of Site SA21. Our reasons for objecting are given below starting on page 3.

For clarity we iterate the draft Local Plan's text on page 86 summarizing the proposal as:

What is the site to be allocated for?

The site is allocated for a new settlement providing:

- a minimum of 800 dwellings including a small number of Gypsy, Traveller, and Travelling Show people pitches and plots;
- about 6 ha of land for employment uses; and
- supporting infrastructure.

Our interpretation of the proposed development based on the original plan (below) which illustrates the scope of the possible intention is as follows:



the construction of a

- minimum of 800 houses, including a small number of Gypsy, Traveller, and Travelling Show people pitches and plots
- primary school,
- community hub,
- 'village' centre,
- sports facilities, and
- variety of employment and office buildings extending up to 6 hectares .

The section on the allocation of Site SA21 continues to state:

'The Local Planning Authority is aware of opportunities for a larger new settlement by incorporating adjacent land, some of which is in the same ownership. The smaller site boundary as suggested to the Local Planning Authority is shown on the site map.'

The land to the east of the proposed site, Site SA21, which is on the Surrey side of the boundary is in the same ownership as the proposed SA21 site. it is therefore realistically the likely extension to justify the infrastructure proposed. The text within the section appears to justify the selection of the site without careful analysis of the 'whole picture'.

The site sits immediately adjoining the boundary between the counties of Hampshire and Surrey, the local planning authorities of East Hampshire District Council and Waverley

Borough Council. The site is closer to main Built-up Area Boundary of Farnham than Bentley. Proposals were submitted to Farnham Town Council as part of their call for sites the Farnham Neighbourhood Plan for the site immediately to the east of the boundary and were rejected, the Summary of Assessment (Site suitability / availability and achievable) stating:

'This proposed new settlement is remote from Farnham and therefore a significant distance from services. The viability of significant advanced infrastructure investment, and the services to be provided as part of the development, is not known. This substantial proposal in open countryside and removed from Farnham would have a significant detrimental effect on the landscape of high sensitivity on this approach to the town. The scale of development is not required during the plan period to meet the identified housing need. A new settlement would not represent an appropriate strategy to accommodate development taking into account the reasonable alternative of brownfield sites in more sustainable locations. The site is unsuitable and potentially unachievable as a housing option.'

Despite the partial review of the Farnham Neighbourhood Plan 2018 to 2032 the site remains rejected by the Plan which is currently at Regulation 16.

Neither is the Northbrook Park site included in the draft Waverley Borough Council Local Plan Part 2. Housing allocations are determined by the Farnham Neighbourhood Plan. Proposals for any development which extends across the boundary should be discussed prior to inclusion / proposed allocation with the councils in Surrey, Waverley Borough Council and Farnham Town Council.

Inclusion of the Northbrook Park site, Site SA21, within the East Hampshire District Council draft Local Plan would challenge the adopted Waverley Borough Council Local Plan and the soon to be made Reviewed Farnham Neighbourhood Plan. Local Plans should reflect the policies in adjoining local planning authority's areas, in this case Waverley Borough Council. Furthermore the inclusion of Site SA21 would have a not insignificant effect on the delivery of the housing developments (and other matters) included in the Farnham Neighbourhood Plan.

The proposed site is closer to the necessary facilities located in Farnham than Alton to ensure sustainable feasibility of the site on either side of the county boundary. As a result potential residents would utilise the services and facilities within Waverley and Farnham, including, but not as a comprehensive list, infrastructure, roads, transport facilities, shops, health providers, etc.

Farnham has accepted 2,780 new dwellings in the Plan period of 2018 to 2032. This will have a significant effect on its infrastructure. The addition of a further 800 dwellings or the possible 1,500 dwellings (as is understood to be desired by the landowner) would be unsustainable. The site on the Surrey side of the boundary was considered unsustainable by the Farnham Housing Land Availability Assessment August 2018, see above. The same has to be said for Site SA21.

Farnham currently has traffic, congestion, parking and air quality issues. The construction of developments already under way in the town will cause not insignificant increases in these issues not to mention the housing sites in other Hampshire areas bordering Farnham. We understand that there are in excess of thirty thousand further dwellings coming forward at the moment. These dwellings, many located just miles from the Farnham boundary, their residents and vehicles will have a significant effect on the town and infrastructure without contributing to the provision of improvements to mitigate the added congestion and pollution. Farnham has a several Air Quality Management Areas. There is increasing concern that air

quality is reducing and the construction of Northbrook could only add to the problem although we hope changes in national legislation could have an effect before the end of the first half of the century.

Bentley Parish Council have expressed concerns at the proposals, hundreds of Bentley residents attended a meeting at the Bentley Memorial Hall on Monday 25 February, an estimated four hundred people. The parish of Bentley currently has approximately 450 houses with a population of approximately 1,250. They have foreseen the impact on Bentley being unmeasurable and that the impact will be felt further afield than Bentley. Residents of the development are likely to look to travel east to work, shop and for their social life and entertainment.

The site development as proposed is, in our opinion, not sustainable when assessed in terms of the National Planning Policy Framework (NPPF). The site is too small and or too far from essential services and facilities. It is likely that residents will be reliant on cars to access local services. Residents will visit Farnham, it being closer, rather than Alton.

A reasonable majority will look to work in London or to the east of the site using the A31 or the rail service. Queuing at the Coxbridge roundabout is already an issue during 'rush hour', the development would escalate the issue considerably.

Bentley has a railway station to the south of the village. We understand that the Bentley Station parking is already beyond capacity so those wanting to travel outside peak hours are unable to park nearby. The local roads around Bentley station are likely to become congested with parked vehicles causing issues on the roads for both cars and others, including cyclist and pedestrians, leading possibly to concerns over safety.

Travelling from Farnham railway station, which is equidistant, is currently some 20% cheaper than travelling from Bentley station. A preferred option probably. Access to Farnham station requires motorist to drive through the town centre travelling from Northbrook Park increasing the air quality issue. The landowner agreeing to fund a new railway station could alleviate the issues at both stations.

As already indicated other services, including essential services, will already be stretched by 2029 unless there is a major shift in infrastructure and government funding in Farnham. Schools, medical services and other facilities will not be able to cope with the demand from the sites 800 houses let alone the 1,500 likely to be built. There would be no CIL funding from the construction of the 800 houses and business uses filtering into Farnham yet Farnham would take the brunt of the demand.

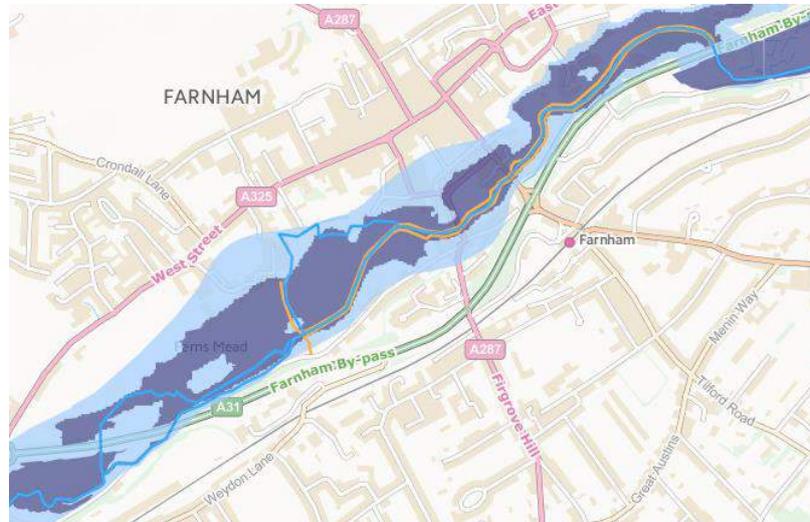
The Northbrook site was rejected for the development having a significant detrimental effect on the landscape of high sensitivity. The council's own Landscape Assessment includes the object of conserving the tranquil nature and character of the north Wey River corridor which is stated to be characterised by riverside pastures. The site borders ancient woodland, a irreplaceable natural asset. Policy 175 of the NPPF 2018 states:

development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists

The proposals would result in the significant loss of green fields and greenspace, and change the A31 corridor immeasurably. The location of the site would require the provision of a Suitable Alternative Natural Greenspace (SANG). The location of this is not indicated

but it has been suggested that the landowner may be considering a site to the south of the A31, requiring access by footbridge.

The draft Local Plan acknowledges that part of the site is within flood zones 2 and 3 together with the fact that these areas would not be developed for residential use. We assume that if the SANG is provided south of the A31 it would be susceptible to flooding which would be unacceptable. The committee have concerns that construction works could lead to increased likelihood of flooding both on the site but more importantly in Farnham resulting from the works.



Current Flood Risk area in Farnham



Current Flood Risk areas at Northbrook Park

We are convinced that a more sustainable site must be available in and or around Alton. Site SA21 would destroy Bentley and have a severe impact on Farnham, one which it could not currently survive.

Yours faithfully

██████████
On behalf of THE FARNHAM SOCIETY Planning Committee

Large Development Sites (Regulation 18) - Consultation Questionnaire

[Redacted]

Tue 15/10/2019 15:30

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: Town Clerk <Town.Clerk@farnham.gov.uk>

📎 1 attachments (327 KB)

FTC response to East Hampshire Large Development Sites.doc;

Please find attached Farnham Town Council's submission to the above consultation.

With thanks

[Redacted]

[Redacted]
Assistant Town Clerk



Council Offices
South Street
Farnham
GU9 7 RN

Telephone: 01252 712667 (Calls may be recorded)

www.farnham.gov.uk

facebook



Large Development Sites

(REGULATION 18)

**CONSULTATION
QUESTIONNAIRE**

3 September – 15 October 2019



East Hampshire Local Plan Large Development Sites

This questionnaire has been prepared to assist you in responding to the consultation and should be used alongside the Large Development Sites consultation document and the Why, when and how to get involved guide.

Please note that the Council is unable to accept anonymous comments and for a comment to be formally accepted, a name and contact address (preferably e-mail) must be provided. Comments to this consultation are part of the evidence base which supports the emerging Local Plan. As such, all comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website. Your comments will be made publicly viewable at the appropriate time.

If you wish to be kept updated about this consultation and other Local Plan matters, please register for email alerts via our website.

Name: [REDACTED] Town Clerk

Organisation (if applicable): Farnham Town Council

Email (**preferred method of contact**): **Town.Clerk@farnham.gov.uk**

Farnham Town Council
Town Council Offices
South Street
Farnham
Surrey
GU9 7RN

How to respond using this form

Please refer to the *Why, when and how to get involved* guide available on our [website](#).

When responding, please include the name of the site your comments refer to. If commenting on more than one site, please make it clear which comment relates to which site.

There are a series of consultation questions. These are:

- 1: Do you have any comments on the proposed uses?
- 2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.
- 3: Do you know of any other constraints to developing the site? Please provide detail and evidence.
- 4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.
- 5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036.

- 6: Is there any reason that this is not achievable?
- 7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?
- 8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper? <link>
- 9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?
- 10: Is there any feedback you would like to give us about this consultation?

Large Development Sites

When responding to a consultation question please quote the question number from the list provided and where applicable, the site name.

Please refer to comments on the additional sheets.

Please provide your comments in the box below. Use additional sheets as required.

SUBMISSION

Please submit your comments to reach us by midnight on 15 October 2019 either by:

- E-mail to localplan@easthants.gov.uk
- By post to Planning Policy, East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

Thank you for taking the time to have your say.

Telephone: 01252712667

(Calls may be monitored or recorded for training purposes)

E-mail: town.clerk@farnham.gov.uk

15th October 2019

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

EAST HAMPSHIRE LOCAL PLAN LARGE DEVELOPMENT SITES REGULATION 18 CONSULTATION

I am writing on behalf of Farnham Town Council in response to the public consultation on the Large Development Sites.

Farnham Town Council representatives have attended the public consultation events, reviewed the proposals, discussed the potential impact on Farnham and responds to the consultation as follows:

Farnham Town Council objects to sites 1 to 8 (Northbrook Park, Chawton Park, Neatham Down, West of Lymington Bottom Road South Medstead, South Medstead, Land south of Winchester Road Four Marks, Four Marks South and Whitehill & Bordon) due to the impact on the A325 and A31 strategic routes to Farnham, noting that each development proposal makes reference to each site linking into these strategic routes with access to Farnham. The quantum of development already happening in the area has cumulatively had a significant impact on the town and avoiding further congestion and its subsequent effect on the environment and air quality is a key consideration.

Farnham Town Council supports and has a preference to sites 9 to 10 (Land south east of Liphook and extension of land east of Horndean (Hazleton Farm)) which both have easier access to the A3 strategic route and greater capacity to absorb increased traffic.

In terms of Site 1 (Northbrook Park) which abuts Farnham Town Council area, the following points reinforce those previously submitted in response to East Hampshire Draft Local Plan Part consultation in March:

Increased traffic – Farnham is already taking more housing despite the fact that the roads around the town are the most congested in the borough and there are significant air quality issues within the town. Farnham Town Council supports Bentley Parish Council's view that "the most severe traffic impact from the proposed Northbrook Park development will be felt beyond Bentley. However, many residents in the parish have to negotiate the Coxbridge Roundabout and the Farnham bypass on regular basis. With a development of this size in this location, those residents can expect further delays to and beyond Farnham." The Coxbridge roundabout is severely impacted by any traffic issues affecting the A31 and A325 – this strategic junction is now facing further pressure from the Northbrook site, 350 homes from the Coxbridge Farm development site and other developments. The Whitehill & Bordon regeneration alone will generate 2,400 new homes and a further 1,284 are proposed in the north of the town which will have a direct access onto the northbound A325 leading to Farnham.

Flood risk – parts of the site lie within the Upper River Wey Flooding Warning Area. The southern, central and north eastern boundaries are susceptible to surface water flooding. Historic flooding records show flooding from the River Wey in Farnham in 1950s, 1967, 2000 and 2013/14 which is likely to increase in the future due to climate change. Farnham Town Council has strong concerns that development in these areas would lead to canalization of the flood plan and have a detrimental downstream of the River Wey, increasing pressure on the flood defences in Farnham Town centre.

The site shows both surface water flood risk and groundwater flood risk. Development proposals include the siting of a SANG and employment land on the section of the site most susceptible to flooding but the qualitative assessment has not taken into account the potential canalization of the River Wey downstream leading to increased pressure on the flood defences in Farnham Town Council or the surface water flooding on A31.

Farnham Town Council notes that the Northbrook Park site has scored 9 reds out of a possible 15, according to the 'Stage 2 Red/Amber/Green Analysis of all sites and all Relevant Features', the highest red score of all the proposed sites:

Yours sincerely



Town Clerk

East Hampshire District Council - FC response to Major Development sites in the Local Plan

[REDACTED]
Mon 14/10/2019 19:05

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [REDACTED]

📎 1 attachments (141 KB)

19-10-14 FC to EHDC re Major Development Sites.pdf;

Dear Sirs

please find attached the Forestry Commission's advice re your consideration of the proposed major development sites for inclusion within the Local Plan.

Please note that our response is from the Forest Service's part of the Forestry Commission and our colleagues in Forestry England who are charged with managing the public forest estate will respond directly to highlight implications of the sites on the woodlands they manage directly.

Yours faithfully

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Partnership and Expertise Manager South East
Forestry Commission - South East & London
Bucks Horn Oak
Farnham
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GU10 4LS

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Tel: 0300 067 4420

Southeast&london@forestrycommission.gov.uk

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

14th October 2019

Dear Sirs

East Hampshire District Council – Local Plan – Major Development sites consultation

Thank you for seeking the Forestry Commission's advice about the impacts of these large development sites within the local authority. Please note that the Forestry Commission (FC) will respond in two discrete ways:

- a. This response from the Forest Services arm of the FC which will seek to advise re generic implications; and
- b. A direct response from our colleagues in Forestry England who will refer to the direct impacts on the woodlands which form part of the Public Forest Estate which they manage; the main sites impacted will be:
 - Northbrook Park (adjacent to Alice Holt Forest),
 - Chawton Park (sandwiched between Chawton Park Wood and Bushy Leaze Wood),
 - Hazelton Farm, Horndean (adjacent to Havant Thicket), and the
 - land south of Liphook (which refers to Ironhill in respect of 'SANGS' provision).

The key principles which we would encourage you to consider are:

1. **Protection of Ancient Woodland and veteran trees:** details of government policy on these irreplaceable national assets and our standing advice are provided below. Key elements include:
 - Avoid loss.
 - Buffer – to prevent encroachment and degradation.

- Avoid degradation of ancient woodland through overuse – several of the sites included lie adjacent to ancient woodland and in some cases it is suggested that this will provide excellent open space for new residents. The FULL implications of such ‘pressure’ should be assessed thoroughly as part of the sustainability appraisal and suitable measures to avoid degradation put in place for perpetuity.

2. Preservation of other woodland and existing trees:

- Other existing woodland can provide a range of eco-system services and should be protected and included in the design with appropriate measures to ensure their management in perpetuity.

3. Inclusion of new trees and woodland in the new development:

- Seek to enhance ecological networks at a landscape scale by buffering and connecting existing woodland (and other priority habitats);
- Consider this ‘green infrastructure’ at a landscape scale exploring opportunities to link existing networks;
- Consider the species and provenance of new trees and woodland to maintain the ecological value of ancient woodland but also to establish a more resilient ‘treescape’ which can cope with the full implications of a changing climate;
- Ensure that in planting new trees and woodland biosecurity is robust to avoid the introduction of pests and diseases.

4. Consider how the new development can help support sustainable management of our existing woodland through:

- Using locally sourced wood/timber within the new developments and their associated infrastructure;
- Optimising the energy efficiency of the new developments; and
- Where heat is required consider the opportunity for district heating and using lower grade locally sourced wood as the ‘carbon lean, fuel for such sites (we have a superb example of how this can be done at Highfield School immediately adj to the Liphook site and a major development site on the Isle of Wight which has a woodfuelled district heating system).

5. Minimise (ideally obviate) the implications of the development on the wider environment:

- Seek carbon neutrality;
- Seek nitrate neutrality of the development (potentially using new woodland to help utilise nitrates before the leave the site and use the wood to heat the site – this approach is well established in other countries); in sites which feed into protected sites this may be critical.

6. Engage future owners in the management of the site and associated green infrastructure:

- Encourage developers to 'embed' ownership and responsibility in the communities who will live and in some cases work on these sites

Specific issues which we would draw your attention to:

Northbrook Park:

- Has lots of ancient woodland within and adjacent;
- The SANGS proposed along the river valley could contribute to slowing flood flows if well designed;
- Significant recreational pressure is likely to be added to the Holt Pound Inclosure section of Alice Holt Forest.

Chawton Park:

- This proposal includes very significant recreational pressure to adjacent ancient woodland.

Whitehill – Bordon:

- We have contributed to the development plans for many years and have been very encouraged by some of the elements which have been included. However, it is disappointing that the proposed district heating network for the new town centre appears to have been dropped and would be interested to explore how the barriers to this approach might be addressed;
- Excellent Green Infrastructure was included in the development BUT we note that some of this is not being maintained;
- Large areas of woodland were retained and access enhanced within them BUT the woods themselves do not appear to have been managed; as such they are extremely vulnerable to the potential impacts of climate change such as storms. If GI is to be included in major development sites its' purpose and long term management needs to be clear and appropriately secured.

Land SE of Liphook:

- You should be aware that the adjacent Highfields School installed an extremely effective woodfuelled district heating system about 10 years ago. The installation included the removal of all (approx. 25) fossil fuelled boilers, the installation of a robust district heating system and the construction of a centralised 'energy centre' which supports the whole site

using locally sourced wood - which supports the sustainable management of existing, generally ancient and semi-natural, woodland. The energy centre may have capacity to support a wider heat network.

Hazelton Farm, Horndean:

- The site should not be considered in isolation as we understand proposals for a new reservoir are likely to be submitted for land south of the site;
- Forestry England manage the woodland at Havant Thicket which lies between the two 'developments';
- The added recreational pressure from both sites are likely to be significant;
- Nitrate implications of the site on Langstone Harbour and the Solent will require careful consideration.

Ancient Woodland. As a non-statutory consultee, the Forestry Commission is pleased to provide you with the attached information that may be helpful when you consider the application:

- Details of Government Policy relating to ancient woodland
- Information on the importance and designation of ancient woodland

Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "*there are wholly exceptional reasons and a suitable compensation strategy exists*" (National Planning Policy Framework paragraph 175).

We also particularly refer you to further technical information set out in Natural England and Forestry Commission's [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide and Case Decisions](#).

As a Non Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland.

Please be aware of the information provided on the [Ancient Woodland Inventory](#) (maintained by Natural England), which can be viewed on the [MAGIC Map Browser](#).

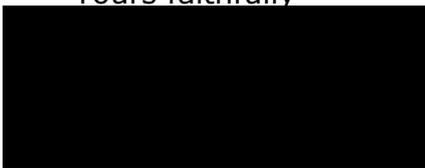
If the planning authority takes the decision to approve development, in principle, on some or all of these sites we may be able to give further support in developing appropriate conditions in relation to woodland management mitigation or compensation measures. Please note however that the Standing Advice states that *“Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal.”*

We suggest that you take regard of any points provided by Natural England about the biodiversity of the woodland.

We also assume that as part of any forthcoming planning application, the local authority will give a screening opinion as to whether or not an Environmental Impact Assessment is needed under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. If not, it is worth advising the applicant to approach the Forestry Commission to provide an opinion as to whether or not an Environmental Impact Assessment is needed under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended.

We hope these comments are helpful to you. If you have any further queries please do not hesitate to contact me.

Yours faithfully



Partnership & Expertise Manager South East

A summary of Government policy on ancient woodland

[Natural Environment and Rural Communities Act 2006](#) (published October 2006).

Section 40 – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.

[National Planning Policy Framework](#) (published July 2018).

Paragraph 175 – “*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*”.

[National Planning Practice Guidance](#) – Natural Environment Guidance. (published March 2014)

This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a non statutory consultee on “*development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in [Natural England’s Ancient Woodland Inventory](#)), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings*”

It also notes that ancient woodland is an irreplaceable habitat, and that, in planning decisions, **Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework**. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.

[The UK Forestry Standard](#) (4th edition published August 2017).

Page 23: “Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance (SLNCIs)”.

[Keepers of Time](#) – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005).

Page 10 “The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland”.

[Natural Environment White Paper “The Natural Choice”](#) (published June 2011)

Paragraph 2.53 - This has a “renewed commitment to conserving and restoring ancient woodlands”.

Paragraph 2.56 – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”.

[Standing Advice for Ancient Woodland and Veteran Trees](#) (first published October 2014, revised November 2018)

This advice, issued jointly by Natural England and the Forestry Commission, is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that are relevant to it.

The Standing Advice refers to an [Assessment Guide](#). This guide sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland.

[Biodiversity 2020: a strategy for England’s wildlife and ecosystem services](#) (published August 2011).

Paragraph 2.16 - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).

Importance and Designation of Ancient and Native Woodland

Ancient Semi Natural Woodland (ASNW)

Woodland composed of mainly native trees and shrubs derived from natural seedfall or coppice rather than from planting, and known to be continuously present on the site since at least AD 1600. Ancient Woodland sites are shown on Natural England's Inventory of Ancient Woodland.

Plantations on Ancient Woodland Site (PAWS)

Woodlands derived from past planting, but on sites known to be continuously wooded in one form or another since at least AD 1600. They can be replanted with conifer and broadleaved trees and can retain ancient woodland features, such as undisturbed soil, ground flora and fungi. Very old PAWS composed of native species can have characteristics of ASNW. Ancient Woodland sites (including PAWS) are on Natural England's Inventory of Ancient Woodland.

Other Semi-Natural Woodland (OSNW)

Woodland which has arisen since AD 1600, is derived from natural seedfall or planting and consists of at least 80% locally native trees and shrubs (i.e., species historically found in England that would arise naturally on the site). Sometimes known as 'recent semi-natural woodland'.

Other woodlands may have developed considerable ecological value, especially if they have been established on cultivated land or been present for many decades.

Information Tools – The Ancient Woodland Inventory

This is described as provisional because new information may become available that shows that woods not on the inventory are likely to be ancient or, occasionally, vice versa. In addition ancient woods less than two hectares or open woodland such as ancient wood-pasture sites were generally not included on the inventories. For more technical detail see [Natural England's Ancient Woodland Inventory](#). Inspection may determine that other areas qualify.

As an example of further information becoming available, Wealden District Council, in partnership with the Forestry Commission, Countryside Agency, the Woodland Trust and the High Weald AONB revised the inventory in their district, including areas under 2ha. Some other local authorities have taken this approach.

Further Guidance

[Felling Licences](#) - Under the Forestry Act (1967) a Felling Licence is required for felling more than 5 cubic metres per calendar quarter. Failure to obtain a licence may lead to prosecution and the issue of a restocking notice.

[Environmental Impact Assessment](#) - Under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended, deforestation which is likely to have a significant impact on the environment may also require formal consent from the Forestry Commission.

Consultation on East Hampshire District Council's (EHDC) Local Plan 2017-2036 - Large Development Sites

[REDACTED]
Tue 15/10/2019 14:25

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [REDACTED]

📎 2 attachments (555 KB)

EHDC Consultation Final Response_Forestry England.pdf; EHDC Local Plan Questionnaire large development sites for web.docx;

Dear Sir/Madam,

Please take this e-mail as a response to the consultation on the Local Plan for East Hampshire on behalf of Forestry England.

Kind Regards

[REDACTED]

[REDACTED]

[REDACTED]
Head of Planning & Environment
South District
Forestry England

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Dear Sir/Madam,

Consultation on East Hampshire District Council's (EHDC) Local Plan 2017-2036

Please take this e-mail as a response to the consultation on the Local Plan for East Hampshire on behalf of Forestry England. As previously discussed within a meeting held between EHDC and Forestry England on 7th October 2019, numerous of the strategic site options, otherwise referred to as 'large development sites' within the Local Plan, directly border areas of the Public Forest Estate (PFE) which we manage; these proposed sites include Chawton Park, Northbrook Park, Extension of Land East of Horndean and Land South East of Liphook. The key points stand in respect to the potential compromising of our ability to perform duties of biodiversity conservation within numerous components of the PFE.

Ancient Woodlands, which include Ancient Semi-Natural Woodland (ASNW) and Plantations (including conifers) on Ancient Woodland Sites (PAWS) are acknowledged as an irreplaceable habitat and a part of our natural and cultural heritage. Mixed broadleaved woodland, wood pasture and parkland are also regarded as principally important for the purpose of biodiversity conservation. It is not possible to mitigate against the loss of any irreplaceable habitat such as Ancient Woodland and we therefore need to ensure that minimal disturbance of these habitats takes place.

We have major concerns regarding the potential impacts of the proposed developments upon the woodlands we manage in this area and our ability to carry out our statutory duties including most notably, although not exclusively, biodiversity conservation. The insufficient buffering, and the omission of policy concerning the protection and restoration of Ancient Woodland i.e. 'Keepers of Time', is a major part of our concerns. It is inevitable that public recreational pressure will increase on the PFE as a consequence of development on neighbouring land. We are therefore keen to find a positive way forward to address this increase in recreational pressure, as well as protecting irreplaceable habitats and species. The impact that any development could have on neighbouring land should be considered as part of the proposal. It is worth bearing in mind that Ancient Woodland habitats adjacent to road improvements and properties will be impacted by pollution (e.g. exhaust fumes, road runoff onto verges, litter) and noise disturbance. We encourage you to design the associated green infrastructure, including green space and new woodland creation, as well as Public Rights of Way to build on the evolving network of green infrastructure linking the adjacent conurbations to the countryside. The PFE has the potential to be a part of this strategy, however we would like to be involved with the discussions in order to ensure that minimal detrimental impacts are imposed on the habitats we protect and manage, and that careful consideration is taken with regards to the impacts on our resources.

Please see below a list with our initial comments:

- Neither the Local Plan nor associated ecological surveys and assessments make adequate reference to Government policy on forests and woodlands and the core principle of Protect, Improve, Expand (PIE) as well as the Policy 'Keepers of Time' (DEFRA & FC England, 2005) which deals specifically with Ancient and Native Woodland restoration.
- The suggestion that a 15m buffer would prove adequate for the protection of the woodlands which we manage is unreasonable, as:

- it does not account for the impact of additional housing development and the associated recreational pressure on the habitats.
- it is based on a presumption that the existing conifer composition of the wood is a permanent state, which it is clearly not, given our policy obligations to restore the site to a native species composition. The bulk of the woodlands we manage in this area have been classified as Ancient Woodland with a high proportion of PAWS, which we are obliged to restore. For further reference to the objectives of Forestry England's woodland management, individual Forest Design Plans for each area of the PFE are available for public viewing. Specifically in relation to this consultation, the relevant Forest Design Plans can be found on the Forestry England website at <https://www.forestryengland.uk/forest-planning/hampshire-downs-forest-plans>; <https://www.forestryengland.uk/forest-planning/alice-holt-forest-plan> and <https://www.forestryengland.uk/forest-planning/forest-bere-forest-plan>). These give a detailed plan for each woodland's long-term direction and future sustainable management.

In light of the above we would like you to consider an appropriate ecological buffer for these sites, taking into account the sensitivities of specific locations and seeking advice from the relevant authorities. The buffer area must be wide enough to protect the existing and future ecological features and to facilitate the absorption of additional recreational pressure from residents once the proposed housing developments have achieved full build-out.

We strongly encourage you to consider a 50m buffer around all Ancient Woodlands and PAWS, as well as extra habitat connectivity throughout the large development sites, as an absolute minimum in order to ameliorate any future negative edge effects (i.e. noise pollution, light pollution, diffuse air pollutants etc.) on the existing Ancient Woodland footprint. It is important to reiterate the fundamental purpose for ecological buffer zones is the protection of Ancient Woodland and priority habitats as irreplaceable habitats. Therefore these buffer zones should be designed accordingly, with appropriate planting of semi-natural habitats, in order to contribute to wider ecological networks. Subsequently, it is inappropriate for buffers to be utilised for alternative purposes i.e. for walking or cycle trails serving the development, as this can harm habitats through potential littering and trampling. The purpose of the buffer is to safeguard the woodland's ecological sustainability and therefore it should not have a dual purpose; any green infrastructure should be in addition to the ecological buffer.

- Forestry England will welcome the inclusion of additional planting, as a way to deliver mitigation and provide an adequate buffer to the important woodlands located in this area, by extending the woodland footprint. Expansion of forest/woodland cover in this part of the District will serve as mitigation in respect of the undoubted increased footfall within the existing S.41 woodland habitat patches. The inclusion of a field complex in a forest expansion initiative will be vital in functionally connecting the outlying woodland habitats. Ideally we would be looking for a mix of planting and establishment of woodland edge/scrub/grassland habitats, and subsequent maintenance, to provide connectivity and foraging areas for fauna supported by the woodlands.

Habitat connectivity is key to sustaining the long-term population viability of European Protected Species (EPS) present in the area, which include dormouse and bats. Natural corridors between Ancient Woodlands and other semi-natural habitats should remain

free from development and safe for wildlife. Forestry England are keen to promote the creation of ecological corridors, including the potential for green bridges or wildlife overpasses, through development sites in order to link areas of PFE and other wildlife habitat, which will benefit a range of protected and vulnerable species.

Additional planting could take place as an extension of the PFE; ensuring woodlands are protected and managed will also contribute to meeting the new requirements of Schedule 4 of the Environmental Impact Assessment Regulations (2017). Careful consideration of the role trees and woodlands play in the scheme will ensure delivery of a more resilient landscape and contribute towards reducing greenhouse emissions, increasing carbon sequestration and to the wider climate change agenda.

- The Local Plan should consider the impact of the proposed developments on hydrological processes and the knock-on effect on S.41 NERC Act listed habitats. Our ability to conserve and enhance this type of habitat could be compromised in the future if appropriate consideration within the Local Plan has not been taken.
- With regards to European Protected Species (EPS) and Schedule 1 species:
 - There must be recommendations for protection of EPS and Schedule 1 species. This is part of our current standard practice under the UK Woodland Assurance Standard (UKWAS).
 - An adequate ecological buffer is necessary to reduce the impact of noise and light pollution on bat roosting and foraging activity. Forestry England would be keen to explore how a more robust ecological buffer can deliver part of the ecological mitigation for the adjoining development which might take the form of new native woodland, forest meadows and/or localised forest wetland habitats, all of which can play a role in supporting Sustainable Urban Drainage (SUDs). Additional justification for a robust ecological buffer comes in response to the potential for the deleterious effects of airborne pollution from proposed roads and elevated traffic levels more generally. We place great concern on the possible impact of air pollution and subsequently the knock-on effects of a potential reduced invertebrate biomass in the woodland environment and subsequent ramifications for foraging EPS listed woodland bats. Recommendations to protect individual trees for the protection of bat species would not contribute to offsetting the impacts of new development in the wider landscape. We are keen to discuss with you the appropriate mitigation for areas where bat species are present (Alice Holt Forest, near the proposed development of Northbrook Park; Havant Thicket near the proposed development of Land East of Horndean; Chawton Park and Bushey Leaze woodlands near the proposed development of Chawton Park). We are aware that developments have taken place in adjacent land without appropriate mitigation for bats.
 - The wider landscape has high potential for dormice. Much research suggests that a larger woodland block can sustain a more viable dormouse population over time. With this in mind one must also consider the value of the PFE as providing a robust breeding area for this EPS listed small mammal in future decades, as our Ancient and Native Woodland restoration programme progresses at a forest scale.

- An agreed financially sustainable visitor management plan could help further mitigate against the effects of elevated levels of visitor numbers on areas of the PFE. However, this could be overly optimistic in the absence of:
 - an appropriate ecological buffer as defined above.
 - a guaranteed additional resource to improve visitor infrastructure and interpretation i.e. surfaced access trails, pedestrian bridges over watercourses, interpretation and managed access points to woodlands, particularly where Ancient Woodland or PAWS are present.

We remain concerned about the potential impact that additional recreational pressure will have on the priority habitats and on Ancient Woodland soils if appropriate mitigation is not put in place. A fully funded visitor management plan should be considered and we are keen to be part of the discussions to accommodate green infrastructure to include interpretation and education, together with provision of adequate ecological buffer zones. The plan should include, but not be limited to, identifying the current recreational infrastructure in place and outlining proposals to provide for the increased pressure from activities such as dog walking, walking, cycling and informal forest activities, which these large development sites will bring. This plan should explore opportunities for investment into both existing and/or new infrastructure within the woodland, recognising that new and improved infrastructure will also create additional on-going management costs. Forestry England are therefore open to discussing different avenues of investment in-perpetuity in order to respond to the increased visitor pressures that would be created by these developments and enable us to continue to sustainably manage our woodlands in the future.

Such proposals must encourage public recreation away from ecologically sensitive areas, in order to enable biodiversity conservation, and take into consideration the safety requirements of ongoing forestry management activities, such as harvesting. It is important to recognise that these areas of the PFE are working forests and remain involved with the sustainable production of timber, which provides an extremely valuable source of revenue for Forestry England. Taking this into consideration, the creation of any visitor management plan will involve detailed discussions with developers and so we ask for a commitment to engaging and working closely with ourselves (Forestry England) in order to incorporate further adjustments to the outline proposal if appropriate. This could possibly enable the agreement of reasonable mitigation measures for increased visitor pressure and also for further site specific requirements to be met in the future.

- It is also worth highlighting that the design and layout of large development sites is extremely important when considering the protection of neighbouring Ancient Woodland ecosystems. If properties are immediately backing onto the buffers or woodland edges, as they are in numerous of the Local Plan's proposed sites, it brings the potential for garden waste being deposited on sensitive habitats. This can in turn lead to the potential risk of non-native or invasive species colonisation, as well as unlawful encroachment on to the buffers over time. Therefore an appropriate land use and layout for the development of the areas adjacent to sensitive sites, or within close proximity to woodland edges, is essential to minimise the potential risk of increased pollution, littering and further detrimental impacts, such as root damage due to soil compaction or even encroachment on sensitive areas.

Following the publication of the 25-year Environment Plan (<https://www.gov.uk/government/publications/25-year-environment-plan>), there is currently an emphasis on the principle of Biodiversity Net Gain (BNG) and the creation of a Nature Recovery Network (NRN) across England. We should take this opportunity to explore ways to embrace a constructive collaboration between East Hampshire District Council and ourselves (Forestry England) in respect of delivering a truly sustainable development in partnership with the Council that could be viewed as a model project by central Government. We are therefore keen to explore options that could benefit the Local Plan as a whole.

Yours sincerely,


Head of Planning & Environment
South District
Forestry England

Large Development Sites

(REGULATION 18)

CONSULTATION QUESTIONNAIRE

3 September – 15 October 2019



East Hampshire Local Plan Large Development Sites

This questionnaire has been prepared to assist you in responding to the consultation and should be used alongside the Large Development Sites consultation document and the Why, when and how to get involved guide.

Please note that the Council is unable to accept anonymous comments and for a comment to be formally accepted, a name and contact address (preferably e-mail) must be provided. Comments to this consultation are part of the evidence base which supports the emerging Local Plan. As such, all comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website. Your comments will be made publicly viewable at the appropriate time.

If you wish to be kept updated about this consultation and other Local Plan matters, please register for email alerts via our website.

Name

Organisation (if applicable)

Email (preferred method of contact)

Address Line 1

Post Town

Post Code



To be completed by agents acting on behalf of a client

Client Name

Client Organisation

Client Email

Client Address Line 1

Client Post Town

Client Post Code



How to respond using this form

Please refer to the ***Why, when and how to get involved*** guide available on our [website](#).

When responding, please include the name of the site your comments refer to. If commenting on more than one site, please make it clear which comment relates to which site.

There are a series of consultation questions. These are:

- 1: Do you have any comments on the proposed uses?
- 2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.
- 3: Do you know of any other constraints to developing the site? Please provide detail and evidence.
- 4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.
- 5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036.

- 6: Is there any reason that this is not achievable?
- 7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?
- 8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper? <link>
- 9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?
- 10: Is there any feedback you would like to give us about this consultation?



Large Development Sites

When responding to a consultation question please quote the question number from the list provided and where applicable, the site name.

Click here to enter text electronically

RESPONSE ATTACHED TO EMAIL (PDF DOCUMENT)



Please provide your comments in the box below. Use additional sheets as required.

Click here to enter text electronically

SUBMISSION

Please submit your comments to reach us by midnight on 15 October 2019 either by:

- E-mail to localplan@easthants.gov.uk
- By post to Planning Policy, East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX



Thank you for taking the time to have your say.



LARGE DEVELOPMENT SITES CONSULTATION - LOCAL PLAN 2017-2036 (REGULATION 18) SUBMISSION FROM FOUR MARKS PARISH COUNCIL

officer@fourmarkspc.co.uk

Tue 15/10/2019 12:23

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [REDACTED]

📎 1 attachments (672 KB)

FMPC Local plan submission Large Sites - FINAL.pdf;

Please find attached the submission, on behalf of Four Marks Parish Council, to the Consultation 3 September – 15 October 2019, as above.

Regards,

[REDACTED]
Executive Officer

clerk@fourmarkspc.co.uk

www.fourmarksvillage.co.uk

Tel: [REDACTED]

Follow us on Twitter @FourMarksPC and Facebook @fourmarksparishcouncil

Office hours 9.30am - 4.30pm

Four Marks Parish Council
The Parish Office
Uplands Lane
Four Marks
ALTON
Hampshire GU34 5AF

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DRAFT LOCAL PLAN 2017-2036

LARGE DEVELOPMENT SITES CONSULTATION 2019

Under Regulation 18 during 3rd September – 15th October 2019

FOUR MARKS PARISH COUNCIL'S SUBMISSION TO EHDC

1. The Submission Process

Four Marks Parish Council (FMPC) and Medstead Parish Council (MPC) have contributed to a separate comprehensive submission made by the Medstead & Four Marks Neighbourhood Plan Steering Group (M&FMSG). FMPC do not wish to duplicate that material, or its references, thus wasting valuable Officer time. This submission may cross-reference to the M&FMSG submission document "EHDC CONSULTATION ON 10 LARGE SITES"

FMPC have submitted a document response, as the provided Questionnaire was too restrictive for use by multiple Parish Councillors, at both Full Council and FMPC Planning Committee.

The Online Portal was restrictive in scope and was an unfamiliar technical format for the Parish Councillors and our Executive Officer (Clerk). There were repeated technical issues with the 'OpusConsult' system, so unreliable to use, especially with repeated issues regarding re-signing back in to saved submissions.

Large Site by Large Site Summary of FMPC views

LAND SOUTH OF WINCHESTER ROAD	OBJECTION
WEST OF LYMINGTON BOTTOM ROAD	OBJECTION
SOUTH MEDSTEAD	OBJECTION
FOUR MARKS SOUTH	OBJECTION
CHAWTON PARK	OBJECTION
NEATHAM DOWN	OBJECTION
LAND SOUTH EAST OF LIPHOOK	NEUTRAL
LAND EAST OF HORNDEAN	NEUTRAL
WHITEHILL AND BORDON	SUPPORT
NORTHBROOK PARK	SUPPORT

2. Councillor and Communities Engagement & Involvement

FMPC has engaged proactively across our community during the Large Sites Consultation. Many FMPC Councillors attended the EHDC meetings with all 10 Site Promoters on 2nd September at Petersfield, 3rd September at Alton and 14th September also at Alton. FMPC has separately met with the three EHDC Ward Councillors on four occasions, with Parish Councils' colleagues from Ropley and Chawton twice, and with residents at the locally organised Community meeting on 8th September (attended by 527 residents). Other smaller discussions with residents across Four Marks and Medstead (FM&M) and neighbouring communities have been extensive and consistent in the views, feedback, and wishes expressed.

3. Summary of Large Sites

FMPC and the Communities **strongly object** to all four of the FM&M sites (Land south of Winchester Road, Four Marks; West of Lymington Bottom Road, South Medstead; South Medstead and Four Marks South) and also **strongly object** to the massive proposal at Chawton Park.

FMPC are disappointed with the level of only superficial information, and the lack of facts and hard proposals in the case of the four FM&M sites. The site promoters stated repeatedly that no detail was available and that this would be submitted at Planning Application stages, or had not been allowed by EHDC at this consultation stage, this was frustrating, disingenuous and unacceptable.

The proposed sites are un-precedented sized housing development site(s) for a Tier 3 Small Local Service Centre like FM&M, potentially worth hundreds of £ millions to the developers and landowners with limited planning gain to the community. The impact of such a site(s) would subject the host community to 8-10 years of building disruption, high impacts of yet more population increases after a decade of rapid growth, place the existing under-resourced infrastructure under yet more pressure, whatever new infrastructure is proposed, and with too little employment or community benefits being evident.

Whitehill and Bordon and Northbrook Park were EHDC's recommendation at the initial draft Local Plan in February 2019 and FMPC's consultation submission in February / March supported strongly the proposal of those two sites. The first has significant infrastructure already implemented, and is a purpose designed new expanded community supported by government and an award winner. The latter (Northbrook Park) is a developed and well researched proposal with significant surveys, reports, and prior consultation with Ward Councillors, Parish Councils, and residents even before the original February/March 2019 Regulation 18 Draft Local Plan Consultation.

FMPC **endorses and supports** the Regulation 18 Draft Local Plan 2017-2036 (Consultation 5th February – 19th March 2019) recommendations made by EHDC for a large site at Whitehill & Bordon and a second large site at Northbrook Park. These would be the correct selections to meet the proposed spatial strategy, delivering 2,000 new homes as part of the 10,456 homes requirement to 2036. FMPC are disappointed that so much concern and disruption has been created to the Community in holding the subsequent Large Sites consultation, *apparently in reaction to alleged land owners and developers complaints, most of whom did not have the commercial initiative or planning awareness to promote their own Large Sites (with properly worked up plans) in addition to their LAA offerings in late 2018.*

4. Planning History

In the Local Plan for 1997-2012 FM&M had an allocation of two adjacent sites just south of the Winchester Road; Meadowbrook (174 dwellings) and Medstead Farm (110 dwellings) built out

between 2008 and 2016. Also, a significant number of windfall dwellings (150+) have been delivered inside the SPBs in cul-de-sac developments, doubling the forecast of 75 windfall homes for FM&M.

The JCS Local Plan 2013-2028 was adopted by EHDC in May 2014 and established a minimum 175 dwellings for FM&M. This was followed by Part 2 Allocations examined and adopted in April 2016 (EAST HAMPSHIRE DISTRICT LOCAL PLAN: HOUSING AND EMPLOYMENT ALLOCATIONS APRIL 2016), when a total of 316 dwellings were permissioned already, an 81% over-delivery for FM&M in the first 5 years of the Plan. The allocated sites were Land at Lymington Barns Farm (Miller Homes) and Land at Friars Oak (William Lacey Group / Bellway Homes) approved as applications under NPPF only, and Land north of Boyneswood Lane refused by EHDC but granted at Appeal (Bargate Homes). A further speculative application in Lymington Bottom Road was refused by EHDC, but the appeal was upheld for 70 dwellings (Cala Homes).

Since then, with a proven robust Five Year Land Supply at April 2016 (published October 2016), a dozen or so major speculative applications in FM&M have been refused by EHDC and five subsequently were dismissed at Appeals.

The decade of development frenzy (2006-2016) has left minimal infrastructure benefits for FM&M. Our community is acknowledged as lacking sufficient infrastructure by both EHDC (LAA Pro Formas December 2018) and a series of Appeal Inspectors quotes (see Neighbourhood Plan submission). There is a recognised and crucial need for FM&M to be allowed both time and resources to catch up, developing community integration and social cohesion along with the required infrastructure and facilities.

5. Planning Period 2017-2036 (Draft Local Plan)

The EHDC Draft Plan LAAs (December 2018) stated that *“The majority of the services in Four Marks (with the exception of the primary school) are located along the A31. The amount of services and facilities in Four Marks and South Medstead have not kept pace with the delivery of new residential development in recent years. It is considered that additional piecemeal development in Four Marks and South Medstead could exacerbate the current pressure on existing services and facilities”*.

The Draft Local Plan for consultation (February 2019) says *“S1.1 New homes will be directed to the most sustainable and accessible locations in the Area which have the most capacity to accommodate them whilst respecting local distinctiveness, protecting the Area’s physical, natural and historic environment, and recognising that places change and will sustainably grow”*. FM&M as a Tier 3 settlement is **neither** sustainable or accessible, **nor** does it have capacity to expand further currently.

The piecemeal and unrestricted site by site speculative development has been an exceptionally rapid across FM&M and created a subsequent decade of continuous disruption across both sides of the A31 which is the only major road access to FM&M. This has not been supported by the appropriate infrastructure provision, and having delivered a completed 81% of homes in excess of its allocation in the first 5 years of the 2013-2028 Local Plan, the FM&M area needs time to integrate and consolidate, as well as somehow to find the missing infra-structure. Yet further speculative promotions or applications of whatever size are therefore pre-mature and inconsistent with the community’s needs and best practice Planning Policy, and the NPPF itself.

Planning Inspector Grahame Gould stated in his Decision Letter of dismissal for Appeal Ref: APP/M1710/W/19/3225766 Land at Friars Oak Farm, Boyneswood Road, Medstead for 58 dwellings on 5th September 2019 :

28. *“Given the recent rate of housing delivery in Four Marks/South Medstead, I consider it unsurprising that MPC, FMPC and residents are concerned about the amount of new housing that has been built and any implications that has for the role and functioning of this area. Those concerns being voiced most particularly in terms of Four Marks/South Medstead becoming a dormitory housing area, with mitigating infrastructure not keeping pace with the rate of new housing delivery. I consider the provision of further housing alone, on what would in effect be an unplanned basis, would not be conducive to the reinforcement of Four Marks/South Medstead’s role and function as a small local service centre providing a limited range of services”.*

29. *“A consequence of the area’s recent rapid growth appears to be mitigating infrastructure provision lagging behind the realisation of the effects it is intended to address. In that regard Parish Councillor Thomas (FMPC) referred to the LEA being “tardy” in providing additional school accommodation¹¹, while Councillor Kemp-Gee (HCC) commented that while infrastructure contributions have been secured “the spend of that money has been slow”.*

Inspector Gould stated also:

19.*“Policy CP10 identified a need to provide a minimum of 175 dwellings between 2011 and 2028 for Four Marks/South Medstead, in practice by the time of the HEAP’s adoption there were 316 dwellings, as quoted in Table 1 of the HEAP4, subject to either allocations with permissions (237 units) or a permission concerning an unallocated site (79 units on the Cala Homes site east of Lymington Bottom Road). The figure of 316 permitted dwellings being around 81% more than the minimum target set for Four Marks/South Medstead, just five years into the JCS’s seventeen year time horizon. To the figure of 316 dwellings subject to permissions in April 2016, a further 83 dwellings have also been granted planning permission as windfalls”.*

20. *“So, since 2011 close to 400 dwellings have been granted planning permission in the Four Marks/South Medstead area, which is a number more than double the minimum target of 175 dwellings identified in Policy CP10”.*

21. *“Additionally, 284 dwellings, within two developments, were constructed between 2011 and 2016, pursuant to allocations predating the JCS Local Plan adoption in May 2014. With respect to recent housing delivery in Medstead and Four Marks, paragraph 1.36 of the Neighbourhood Plan records that since 2001 there has been a 38% increase in the number of homes, with the average number of new homes delivered per year between 2001 and 2011 being around 30 units, with that figure increasing to 60 units per year between 2011 and 2015”.*

22. *“I believe it fair to say, at around the halfway point of the JCS’s plan period, that there has been a significant exceedance of the minimum housing target for Four Marks/South Medstead, with that coming off the back of a period of sustained housing delivery, stretching back to 2011. I consider it is clear that the Four Marks/South Medstead area has been playing a noteworthy role in supporting the Government’s ‘... objective of significantly boosting the supply of homes ...’ (paragraph 59 of the Framework)”.*

The JCS Local Plan 2013- 2028 had the housing needs assessed and examined at a minimum of 10,060 homes in May 2016. The Allocations followed in April 2016, with a proven robust Five Year Land Supply since October 2016. Now the mandatory Five Year Review applies the new (and much criticised) national standard calculation of need for the Draft Local Plan at 10,456 for 2017-2036. Slightly more houses but over a longer period.

FM&M has made a significant and early contribution to the 2013-2028 Plan, as noted by Inspector Gould above. FMPC argues that no more new homes developments in FM&M should be considered until post 2028 at the earliest and even then, only at a small scale in-line with previous Plan periods’

allocations. A proposed allocation of 130-150 homes (post 2032) is the maximum realistic quantum the settlement can accommodate to 2036.

Any Large Site proposal of 600+ homes in, or abutting, FM&M is un-sustainable, un-deliverable, un-necessary, and un-suitable.

Therefore, the draft allocations proposed for FM&M in the Draft Plan 2017-2036 are for just one new housing site of 130-150 dwellings at Land South of Winchester Road – site SA25

Four Marks Parish

The following table shows the minimum quantum of development in Four Marks Parish during the plan period.

	Completions 17/18	Planning permissions	Allocations	Total
Housing (number of dwellings)	16	21	130-150	167-187
Gypsy and Traveller Pitches	1	0	11	12

The following table lists the proposed site allocations.

Site reference	Site address	Allocated for	Timeframe
Site SA25	Land South of Winchester Road, Four Marks	130-150 dwellings	2032/33 – 2035/36
Site SA26	Janeland, Willis Lane	5 Gypsy and Traveller pitches	Within the next 5 years
Site SA27	Briars Lodge, Willis Lane	4 Gypsy and Traveller pitches	Within the next 5 years
Site SA28	Land at Alton Lane	2 Gypsy and Traveller pitches	Within the next 5 years

Medstead Parish

The following table shows the minimum quantum of development in Medstead Parish during the plan period.

	Completions 17/18	Planning permissions	Allocations	Total
Housing (number of dwellings)	133	225	0	358

Although there are no new allocations proposed for Medstead, Land North of Boyneswood Lane allocation is being carried forward and is therefore set out on the following page (Site SA29). This site has planning permission and is therefore counted within the "planning permission" figure above.

The allocation for Land to the rear of Junipers, is not proposed to be carried forward.

6. Highways - A31 Traffic Flow and Access Capacity Considerations

The suggestion that traffic lights or roundabouts on the A31 could be appropriate mitigation solutions are unsubstantiated and unproven, especially considering HCC Highways stated policy of maintaining the flow of traffic through FM&M. The A31 traffic flow can be rapidly brought to a standstill by the smallest blockage, road works, or road traffic collision as experienced regularly by local residents for the last ten years. The Atkins Report (Atkins Technical Note of June 2016 'Package 1: Transport Feasibility Study' prepared for Hampshire County Council – version assessing the cumulative traffic impact of residential proposed in Four Marks) demonstrates that the major junctions at Telegraph Lane, Boyneswood Lane, and Lymington Bottom / Lymington Bottom Road are at 85 +% capacity. The two small roads serving Meadowbrook (174 dwellings) and Charles Church (110 dwellings) are frequently queued at peak hours unable to access the A31 even turning left, let alone right.

A recent (September 2019) HCC Traffic Flow Survey shows the high volumes of traffic flows through FM&M on the A31 for the single carriageways in each direction. At **each end of the village** at the HCC survey locations the peak flows morning and afternoon **in both directions** are over 600 vehicles per hour - 10 vehicles per minute, 1 vehicle every 6 seconds.

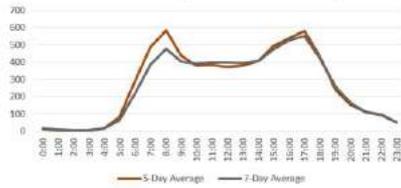
This continuous flow makes it difficult to enter the A31, or turn right across the traffic flow, at all major and some minor junctions. At Telegraph Lane, the eastbound morning peak of 800 vehicles per hour and westbound flow of 700 vehicles per hour at 08:00 makes a left hand turn difficult, and a right hand one virtually impossible. This leads to regular traffic queues in both Telegraph Lane and Blackberry Lane back from the A31 'T'-junction. At the 7 pm peak the westbound flow entering the village is registered by HCC at 1,000 vehicles per hour.



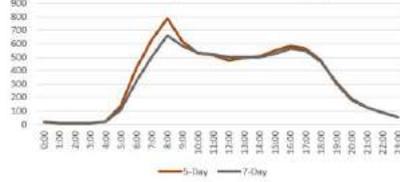
HCC Traffic Survey between 19/09/2019 to 26/09/2019



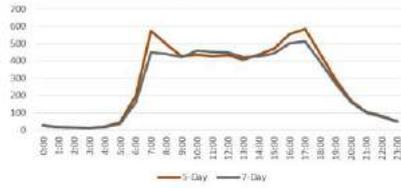
A31 Four Marks - September 2019 Vehicle Count
HCC Traffic Survey EASTBOUND Travelodge



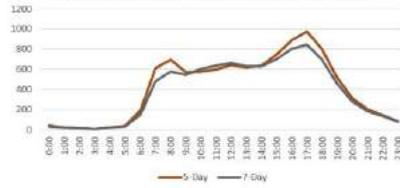
A31 Four Marks - September 2019 Vehicle Count
HCC Traffic Survey EASTBOUND Telegraph Lane



A31 Four Marks - September 2019 Vehicle Count
HCC Traffic Survey WESTBOUND Travelodge



A31 Four Marks - September 2019 Vehicle Count
HCC Traffic Survey WESTBOUND Telegraph Lane



7. 10 Sites – Site by Site Comments

LAND SOUTH OF WINCHESTER ROAD, FOUR MARKS

OBJECTION

SUMMARY

This site is unsustainable, unsuitable, undeliverable and unnecessary, and therefore OBJECT to this site's inclusion in the Local Plan as a Large Development Site.

1. GENERAL:

- *The site is sustainably located for access to the services and facilities in Four Marks and forms a logical extension to the settlement. Whilst the amount of services and facilities in Four Marks and South Medstead have not kept pace with the delivery of new residential development in recent years, a development of this size is able to make a greater contribution towards local infrastructure provision. **East Hampshire District Council Land Availability Assessment (LAA) December 2008 FM-013***
- *The area has a rural character, with low density sporadic development opposite. Development would have an adverse impact on the intrinsic character of the countryside. An intense residential development would be out of character with the area. Given the rural location, this is an unsustainable location for residential development. **East Hampshire District Council Land Availability Assessment (LAA) December 2008 ROP-015***
- Four Marks and South Medstead have already exceeded the minimum requirement of housing as stated in the Local Plan by over 80%, within the plan period to 2028 **in the first five years.**
- SA25 (FM-013 as above) has been identified as a possible major site for up to 160 homes, and supported as acceptable in principle, if the landscape and topography are not compromised.

2. SPATIAL STRATEGY:

- This proposal breaches the natural geographical boundaries of the settlement and community.
- Linear extension further fragments the existing settlement and community.
- The community hub proposed is too far away from the Four Marks central hub, elongating the existing ribbon pattern

3. ECONOMIC DEVELOPMENT

3.1 Employment

There is insufficient employment provision for the proposed additional households. The proposal indicates only two hectares of employment (approx. 200 jobs) for a development of 600 homes, and the offer is land *not* the buildings. The requirement should be one house, one job. Social cohesion creates a thriving and progressing community, but minimal local employment and over 650 new home in the last decade already has created some segmented commuter communities or even dormitory areas, which this proposal would accelerate further

3.2 Tourism & Heritage

The site will be in full visibility from the Watercress Line and so will have an adverse effect on the amenity of a major local tourist attraction, which has important local economic benefits. The immediate view from the railway embankment will not be of the existing pasture and arable farmland and hedges, but of a commercial and employment site and Gypsy & Traveller site / pitches creating a significant negative effect on an important local economic catalyst.

4. COMMUNITY

4.1 Open Spaces

There is no clear definition of what open space, recreational space and facilities are provided, and therefore not policy compliant. Just vague promises and illustrative indications.

4.2 Density

The proposed density, which is in excess of 30 dph and up to 35 dph, is of an urban development, totally inappropriate for this location and does not reflect even the worst examples of the recent existing developments.

5. NATURAL ENVIRONMENT

5.1 Landscape

- The development will affect the setting of the South Downs National Park and the visible amenity of long distance vistas due to the topography of the proposed site's elevated sections.
- There will be a detrimental affect on the landscape setting of Ropley, as identified in the adopted Ropley Neighbourhood Plan. This area is of 'significant visual prominence' and a valued landscape to Four Marks, Medstead and Ropley communities at the western gateway to Four Marks.
- The landscape from the westerly direction will be changed significantly, and the topography will highlight its prominence and will be viewed for some considerable distance, particularly at night with even restricted lighting conditions. Serious consideration needs to be given to the proximity to the SDNP and their Dark Skies Policy (Strategic policy SD8: Dark Night Skies)
- There will be a shrinking 'strategic gap' between the settlements of Four Marks and Ropley.

5.2 Ecology and climate change

The loss of prime agricultural land goes against the concerns about Climate Change, and both HCC and EDHC declaration of a Climate Emergency. In developing agricultural land, it will only add to carbon emissions, and not adhere to the government directive to ensure there are zero carbon emissions by 2050, by removing high quality agricultural land from production.

5.3 Flooding

Due to the topography there will be excessive water run off to lower levels and towards the River Itchen. The site will require nitrate mitigation, which has not been mentioned. This will also have a knock on effect on the environment, local ecology and climate. See point 5.2.

6. TRANSPORT AND ACCESS

- Any consideration for traffic management will have an adverse effect on the free flow of the A31 trunk road, already a high capacity route exacerbated by being single carriageway through Four Marks.
- There will need to be a pedestrian and land bridge provided to cross the A31 and connect the development with the employment area.
- Additional traffic movements; due to the location, vehicles will be used, adding to pollution and climate change. See point 5.2

7. INFRASTRUCTURE

- There is no provision for a community building and/or land to satisfy the needs of the whole community

- There is no provision for additional recreational activities or facilities for the youth.
- No consideration has been given to the already overstretched local medical facilities and current shortage of General Practitioners both locally and nationwide.

8. EDUCATION

- Primary education; Four Marks Primary School currently being extended to cater for the existing over development, Medstead Primary School is at full capacity with no option to extend.
- Secondary education. The proposed new development in Alresford will fill the secondary school in Alresford, this development will fall in their catchment. The two Alton secondary schools will have additional intake from the new Alton developments. There is no reference to or provision for secondary education.
- HCC promote walking to school. A primary school would need to be provided as there are no safe pedestrian routes to any local primary schools. Additional car journeys would add to pollution concerns. See point. 5.2.

WEST OF LYMINGTON BOTTOM ROAD, SOUTH MEDSTEAD

OBJECTION

SUMMARY

This site is unsustainable, unsuitable, undeliverable and unnecessary, and therefore OBJECT to this site's inclusion in the Local Plan as a Large Development Site.

1. GENERAL:

- *"The site is in the countryside and there is a lack of local infrastructure in South Medstead, particularly as vehicle access to the A31 is through a narrow single-track bridge and gaining vehicular access to the site is unresolved. The amount of services and facilities in Four Marks and South Medstead have not kept pace with the delivery of new residential development in recent years. It is considered that additional piecemeal development in Four Marks and South Medstead could exacerbate the current pressure on existing services and facilities. This is an unsustainable location for residential development". East Hampshire District Council Land Availability Assessment (LAA) December 2008*
- Four Marks and South Medstead have already exceeded the minimum requirement of housing as stated in the Local Plan by over 80%, within the plan period to 2028 **in the first five years**
- The proposal is undeliverable due to dislocated parcels of land, multiple land owners and developers.

2. SPACIAL STRATEGY:

- This is a bolt on to an existing development and detrimentally affects the existing landscape.

3. ECONOMIC DEVELOPMENT

3.1 Employment

- Insufficient employment provision for the additional households. The proposal indicates only two hectares of employment for a development of 600 homes, and the offer is land *not* building. The requirement is one house, one job. Social cohesion creates a thriving

and progressing community, minimal local employment means the creation of a community or dormitory town.

- Existing retail provision with permission to expand meet current employment needs, not designed to deliver additional employment for further housing development.

3.2 Tourism & Heritage

The site will be in full visibility from the Watercross Line and so will have an adverse effect on the amenity of a major local tourist attraction, which has important local economic benefits.

4. **COMMUNITY**

4.1 Open Spaces

There is no clear definition of what recreational space and facilities are provided, and therefore not policy compliant with the plan.

5. **NATURAL ENVIRONMENT**

5.1 Landscape

Developing a large area of open space and agricultural land will have a detrimental effect on the existing landscape setting of this area of Medstead.

5.2 Ecology and climate change

The loss of agricultural land goes against the action against climate change, developing agricultural land will only add to carbon emissions, and not adhere to the directive to ensure there are zero carbon emissions by 2025.

5.3 Flooding

Potential water run off to lower levels and towards the River Itchen, therefore the site will potentially require nitrate mitigation. This will also have a knock-on effect on the environment, local ecology and climate. See point 5.2.

6. **TRANSPORT AND ACCESS**

- Any consideration for traffic management will have an adverse effect on the free flow of the A31 trunk road, already a high capacity route exacerbated by being single carriageway through Four Marks.
- The proposed traffic lights at the bridge for traffic alleviation is an unworkable scheme
- Safety concerns with the pedestrian access under the bridge, Highways have already indicated that protective safety rails cannot be installed due to the restricted width.
- Both available junctions to the A31, Lymington Bottom Road and Boyneswood Road, are already over capacity (HCC Atkins Report) and both are single access.
- There is one primary access road to the development which would be through a recently developed site with restricted width and pinch point, commercial traffic would be compromising to existing residents and dwellings.
- Additional traffic movements and idling traffic at both sides of the bridge would add to the climate change concerns, see point 5.2.

7. **INFRASTRUCTURE**

- There is no commitment to build or introduce infrastructure. There is a requirement for a community building and/or land to satisfy the needs of the whole community
- There is no provision for additional recreational activities or facilities for the youth.
- No consideration has been given to the already overstretched local medical facilities and current shortage of General Practitioners both locally and nationwide.

8. EDUCATION

- Primary education; Four Marks Primary School currently being extended to cater for the existing over development, Medstead Primary School is at full capacity with no option to extend.
- Secondary education. The proposed new development in Alresford will fill the secondary school in Alresford, this development will fall in their catchment. The two Alton secondary schools will have additional intake from the new Alton developments. There is no reference to or provision for secondary education.
- HCC promote walking to school. A primary school would need to be provided as there are no safe pedestrian routes to any local primary schools. Additional car journeys would add to pollution concerns. See point. 5.2.

SOUTH MEDSTEAD

OBJECTION

SUMMARY

This site is unsustainable, unsuitable, undeliverable and unnecessary, and therefore OBJECT to this site's inclusion in the Local Plan as a Large Development Site.

1. GENERAL:

- *"The site is a large infill site surrounded by residential dwellings bordering a footpath and bridleway. The open pastoral fields bounded by mature trees and hedgerows are typical of the wider landscape and development of such a scale would affect the character locally. The site is in the countryside and there is a lack of local infrastructure in South Medstead, particularly as vehicle access to the A31 is through a narrow single-track bridge and gaining vehicular access to the site is unresolved. The amount of services and facilities in Four Marks and South Medstead have not kept pace with the delivery of new residential development in recent years. It is considered that additional piecemeal development in Four Marks and South Medstead could exacerbate the current pressure on existing services and facilities. This is an unsustainable location for residential development". East Hampshire District Council Land Availability Assessment (LAA) December 2008*
- Four Marks and South Medstead have already exceeded the minimum requirement of housing as stated in the Local Plan by over 80%, within the plan period to 2028, **in the first five years**
- The proposal is undeliverable due to dislocated parcels of land, multiple land owners and developers.

2. SPACIAL STRATEGY:

- This is a bolt on to existing developments, fragments the existing settlement and detrimentally affects the existing landscape.

3. ECONOMIC DEVELOPMENT

4.2 Employment

- Insufficient employment provision for the additional households. The proposal indicates only two hectares of employment for a development of 600 homes, and the offer is land *not* building. The requirement is one house, one job. Social cohesion creates a thriving

and progressing community, minimal local employment means the creation of a community or dormitory town.

- Existing retail provision with permission to expand meet current employment needs, not designed to deliver additional employment for further housing development.

4.3 Tourism & Heritage

A portion of the site will be in full visibility from the Watercross Line and so will have an adverse effect on the amenity of a major local tourist attraction, which has important local economic benefits.

4. COMMUNITY

4.1 Open Spaces

There is no clear definition of what recreational space and facilities are provided, and therefore not policy compliant with the plan.

5. NATURAL ENVIRONMENT

5.1 Landscape

Developing a large area of open space and agricultural land will have a detrimental effect on the existing landscape setting of this area of Medstead.

5.2 Ecology and climate change

The loss of agricultural land goes against the action against climate change, developing agricultural land will only add to carbon emissions, and not adhere to the directive to ensure there are zero carbon emissions by 2025.

5.3 Flooding

Development in this location is likely to increase water run off due to the topography of the site, exacerbating a historic flooding issue at Five Ash Lane junction with Lymington Bottom Road.

6. TRANSPORT AND ACCESS

- Any consideration for traffic management will have an adverse effect on the free flow of the A31 trunk road, already a high capacity route exacerbated by being single carriageway through Four Marks.
- The proposed traffic lights at the bridge for traffic alleviation is an unworkable scheme
- Safety concerns with the pedestrian access under the bridge, Highways have already indicated that protective safety rails cannot be installed due to the restricted width.
- Both available junctions to the A31, Lymington Bottom Road and Boyneswood Road, are already over capacity (HCC Atkins Report) and both are single access.
- Additional traffic movements and idling traffic at both sides of the bridge would add to the climate change concerns, see point 5.2.

7. INFRASTRUCTURE

- There is no commitment to build or introduce infrastructure. There is a requirement for a community building and/or land to satisfy the needs of the whole community
- There is no provision for additional recreational activities or facilities for the youth.
- No consideration has been given to the already overstretched local medical facilities and current shortage of General Practitioners both locally and nationwide.

8. EDUCATION

- Primary education; Four Marks Primary School currently being extended to cater for the existing over development, Medstead Primary School is at full capacity with no option to extend.
- Secondary education. The proposed new development in Alresford will fill the secondary school in Alresford, this development will fall in their catchment. The two Alton secondary schools will have additional intake from the new Alton developments. There is no reference to or provision for secondary education.
- HCC promote walking to school. A primary school would need to be provided as there are no safe pedestrian routes to any local primary schools. Additional car journeys would add to pollution concerns. See point. 5.2.

FOUR MARKS SOUTH

OBJECTION

SUMMARY

This site is unsustainable, unsuitable, undeliverable and unnecessary, and therefore OBJECT to this site's inclusion in the Local Plan as a Large Development Site.

1. GENERAL:

- *"The character along Blackberry Lane is for large detached dwellings fronting the road with large rear gardens. Backland development at this site would be out of character with this part of Four Marks. The amount of services and facilities in Four Marks and South Medstead have not kept pace with the delivery of new residential development in recent years. It is considered that additional piecemeal development in Four Marks and South Medstead could exacerbate the current pressure on existing services and facilities". East Hampshire District Council Land Availability Assessment (LAA) December 2008 FM-002*
- *Development would have an adverse impact on the intrinsic character of the countryside. The majority of the services in Four Marks (with the exception of the primary school) are located along the A31. The amount of services and facilities in Four Marks and South Medstead have not kept pace with the delivery of new residential development in recent years. It is considered that additional piecemeal development in Four Marks and South Medstead could exacerbate the current pressure on existing services and facilities. East Hampshire District Council Land Availability Assessment (LAA) December 2008 FM-005*
- *The general character along Blackberry Lane and Alton Lane is for large detached dwellings fronting the road with large rear gardens. Additional backland development at this site would be detrimental to the character of the area. The amount of services and facilities in Four Marks and South Medstead have not kept pace with the delivery of new residential development in recent years. It is considered that additional piecemeal development in Four Marks and South Medstead could exacerbate the current pressure on existing services and facilities. East Hampshire District Council Land Availability Assessment (LAA) December 2008 FM-011 and FM-012*
- Four Marks and South Medstead have already exceeded the minimum requirement of housing as stated in the Local Plan by over 80%, within the plan period to 2028, **in the first five years.**
- The proposal is undeliverable due to dislocated parcels of land, multiple land owners and developers.

- Large numbers of existing residents will be detrimentally affected by the long term disruption of this fragmented large scale development, disturbing their quality of life and potentially even their physical and mental health.

2. SPACIAL STRATEGY:

- This is a fragmented site, there will be no social cohesion, just random pieces of land put forward with clear divisions and gaps. A speculative proposal and a consortium of opportunism.

3. ECONOMIC DEVELOPMENT

3.1 Employment

Insufficient employment provision for the additional households. The proposal indicates only one hectare of employment for a development of over 800 homes, which is a gross under-provision. The requirement is one house, one job. Social cohesion creates a thriving and progressing community, minimal local employment means the creation of a community or dormitory town.

3.2 Tourism & Heritage

A rural public footpath runs through the site which links with the historic St Swithun's Way.

4. COMMUNITY

4.1 Open Spaces

There is no clear definition of what recreational space and facilities are provided, and therefore not policy compliant with the plan.

5. NATURAL ENVIRONMENT

5.1 Landscape

An area of the proposed development is adjacent to the South Downs National Park which will affect the setting. The fragmented infill nature of this development will detrimentally affect the existing rural setting.

5.2 Ecology and climate change

- The loss of agricultural land goes against the action against climate change, developing agricultural land will only add to carbon emissions, and not adhere to the directive to ensure there are zero carbon emissions by 2025.
- No proposed mitigation for the protection of rare local species, including dormice, slow worms and rare orchids.

5.3 Flooding

There will be excessive water run off due to the topography of the site, exacerbating a historic flooding issue at the Lymington Bottom junction with Alton Lane.

5.4 Pollution

- Development of this scale will have a massively detrimental effect on light pollution, and due to its proximity to the SDNP, against the SDNP Dark Skies policy (Strategic policy SD8: Dark Night Skies)

6. TRANSPORT AND ACCESS

- Any consideration for traffic management will have an adverse effect on the free flow of the A31 trunk road, already a high capacity route exacerbated by being single carriageway through Four Marks.

- Highways have indicated that there is no scope to improve any of the affected and unsustainable junctions at Blackberry Lane/Brislands Lane, Blackberry Lane/Telegraph Lane, Telegraph Lane/A31 Winchester Road, Alton Lane/Lymington Bottom and Alton Lane/Telegraph Lane, all of which are already at capacity.

7. INFRASTRUCTURE

- Commitment to build or introduce infrastructure is vague. There is a requirement for a community building and/or land to satisfy the needs of the whole community.
- There is no provision for additional recreational activities or facilities for the youth.
- No consideration has been given to the already overstretched local medical facilities and current shortage of General Practitioners both locally and nationwide.

8. EDUCATION

- Primary education; Four Marks Primary School currently being extended to cater for the existing over development, Medstead Primary School is at full capacity with no option to extend.
- Secondary education. The proposed new development in Alresford will fill the secondary school in Alresford, this development will fall in their catchment. The two Alton secondary schools will have additional intake from the new Alton developments. There is no reference to or provision for secondary education.
- The initial proposal to relocate the primary school to a peripheral location will move the facility further away making accessibility difficult for pupils at the far end of the village. A subsequent goal post moving proposal to designate the new facility as a second primary school will just sub divide the community further and would be inferior to the current facilities at the existing school.

CHAWTON PARK

OBJECTION

This proposal is in a special landscape setting, next to a historic railway line, and abutting ancient woodland. Development here would have a major detrimental effect on a national tourist attraction. The deliverability is doubtful due to potential multiple land owners.

To access Chawton Village a Pedestrian bridge would be required over the A31.

The site would be adjacent to the permissioned Treloar Meadows and Selborne Road developments, with only a single access bridge and proximity to the sports centre and special interest facilities

The employment land is under separate ownership and allocated separately in the draft plan for proposed Alton development sites, and only 1 hectare per 1200 dwellings is grossly under provided.

The development would quadruple the size of the heritage village of Chawton and will affect the setting of the SDNP.

This site is not deliverable, nor sustainable, and would have a detrimental effect on its locality and OBJECT to its inclusion as a large development site.

NEATHAM DOWN

OBJECTION

This proposal changes the nature of Alton by moving it to the South side of the A31 and outside the natural containment of the existing town.

It will be a highly visible site and affect the setting of Alton due to its topography.

Lack of local employment opportunity will affect commuter access, and the current station car park would not be cope with increased capacity, and additional strain on the A31.

You have to go through the designated employment area to get to houses and is an inadequate size.

This site is not deliverable, nor sustainable, and would have a detrimental effect on its locality and OBJECT to its inclusion as a large development site.

LAND SOUTH EAST OF LIPHOOK

NEUTRAL

There are several pros and cons with this site, it is self-contained land with good transport connections, it makes the existing site more viable and is a natural completion of the site. However, the additional traffic movement will have an adverse effect and disrupt the village centre.

This proposal is neither supported nor objected to and remain NEUTRAL on this proposal.

EXTENSION OF LAND EAST OF HORNDEAN (Hazleton Farm)

NEUTRAL

Although there are clear merits of the site; it abuts the new development, has good transport links, but the new development of 700 has not yet been built out and therefore believe it is too premature to bring this site forward for inclusion at this stage.

This proposal is neither supported nor objected to and remain NEUTRAL on this proposal.

WHITEHILL AND BORDON

SUPPORT

This site is fully viable, has new Infrastructure already in place, and significant transport links.

It is a good example of a well considered proposal, within the award winning eco redevelopment, with one land owner and primarily an MOD brownfield site.

This proposal is fully SUPPORTED

NORTHBROOK PARK

SUPPORT

This proposed development is well designed and advanced in planning. With only one land owner has a higher probability of deliverability.

It is a sustainable, self-contained development, with easy access to transport links and two local railway stations, with good commercial provision.

There are active discussions on mitigation of traffic, alleviating concerns over A31 capacity.

The community facilities provided will be run in trust in perpetuity.

It is a flat, well screened sight, currently parkland with a provision of 15 hectares of SANGS

This proposal is fully SUPPORTED.

8. Conclusions

For the reasons given above, and those in the more detailed analysis of the Medstead & Four Marks Neighbourhood Plan Steering Group, Four Marks Parish Council (FMPC) strongly objects to the proposed Large Sites in, or close to, Four Marks and Medstead on the grounds of un-sustainability, over-development in a location lacking essential infrastructure, saturation of the A31 and feeder roads, and the lack of social cohesion / sense of community created by commuter settlements without sufficient local employment provided.

FMPC also object to the Large Sites at Chawton Park and Neatham Down.

FMPC has neutral views on the sites at Land south east of Liphook and Land east of Horndean.

FMPC support the selection of the Large Sites at Whitehill & Bordon and Northbrook Park which have existing or well-planned infrastructure and capacity to deliver integrated communities.

Froyle Parish Council Response to EHDC Draft Local Plan Consultation Large Development Site Consultation

clerk@froyleparishcouncil.org.uk

Fri 11/10/2019 17:11

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [REDACTED]@froyleparishcouncil.org.uk>; [REDACTED]@froyleparishcouncil.org.uk>; [REDACTED]@froyleparishcouncil.org.uk>; [REDACTED]@froyleparishcouncil.org.uk>; [REDACTED]@froyleparishcouncil.org.uk>; [REDACTED]@froyleparishcouncil.org.uk>; [REDACTED]@froyleparishcouncil.org.uk>; [REDACTED]@froyleparishcouncil.org.uk>; [REDACTED]@froyleparishcouncil.org.uk>; [REDACTED]@froyleparishcouncil.org.uk>

 1 attachments (40 KB)

Response to Local Plan consultation 10_19.doc;

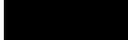
Dear Sir,

Please find enclosed Froyle Parish Council's response to EHDC's Draft Local Plan Consultation for your consideration

Kind regards

[REDACTED]

Greatham Parish Council response to Large Sites Consultation - Whitehill & Bordon

 <clerk@greatham-hants.org.uk>

Fri 11/10/2019 16:29

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Greatham Parish Council wish to submit the following response to the Large Sites consultation relating to the proposed Whitehill & Bordon site.

We acknowledge that the proposed Whitehill and Bordon large development site falls outside of our parish and therefore we would only wish to respond on the impact to Greatham Parish.

We therefore propose commenting as follows:

Greatham Parish Council would like to respond to the EHDC Large Sites Consultation Document. Our comments relate to the Whitehill and Borden site, and concern two main themes:

Traffic: At a time when Greatham Parish Council is working hard to reduce the number and speed of cars travelling through the village of Greatham, we have concerns that the proposed large development in Whitehill and Bordon will increase traffic.

The A325 is the principal road south from the proposed development into the South Downs National Park. Particularly during periods when the A3 is busy and traffic approaching the Ham Barn Roundabout is backed up to the Longmoor turn off, Greatham is used as a cut through from the A325.

We are very concerned that, with additional houses and businesses in Whitehill and Bordon, the village will become further congested, with consequent impact on the safety and quality of life of Greatham residents.

Conversely, additional houses present an opportunity to improve public infrastructure. As a small village with limited facilities Greatham would welcome the provision of an improved public transport link if this development goes ahead. This could bring more custom to facilities and reduce traffic into Greatham.

Green Space: At present there is a clear separation between the settlements of Whitehill and Bordon and the parish of Greatham. This separation is provided by the green space areas of Blackmoor to the west and Longmoor to the east.

As a gateway to the South Downs National Park, we are extremely keen to maintain that separation, and would object to anything that diminished that green space. We note that the proposed development only abuts the green separation, so we would not object as it currently stands.

We would welcome the opportunity to work with EHDC on both of these issues.


Clerk to Greatham Parish Council

I work 12 hours per week on a flexible basis so may not answer emails immediately. If anything is urgent please call [REDACTED].

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Hampshire Public Health Response to East Hampshire Large Development Sites Consultation
Local Plan 2017-2036 October 2019

Consultation:	East Hampshire Large Development Sites Consultation
Comments by:	Hampshire County Council Public Health
Date of Comments:	14 th October 2019
Correspondence to:	[REDACTED]

Thank you for the opportunity to respond to this consultation on options for large development sites in East Hampshire.

In response to this consultation, we have provided below relevant health needs and challenges for the areas being considered. We hope this will help to guide the requirements for social, community and transport infrastructure, as well as potential future site-specific policies and master planning. Emerging local plan policy (policy S4) in East Hampshire recognises the roles of spatial planning in health and wellbeing and emphasises healthy lifestyles, including making provision within new developments for walking and cycling, active travel, community spaces and green infrastructure.

1.1. Health and demographic profile for East Hampshire

Health in East Hampshire is generally good, with average life expectancy across the district being higher than the national average. East Hampshire also has a higher proportion of older adults and lower proportion of working-aged adults than the national average. The proportion of people aged over 65 is expected to further increase for East Hampshire over the lifetime of the local plan. This ageing population will define the way in which residents interact with the physical environment and will also define infrastructure needs.

Additionally, across the district there is a trend of rising rates of childhood obesity. Meanwhile, more than two thirds of adults in East Hampshire are overweight or obese. This highlights the distinct need for developments that support healthy weight and physical activity. For example, walkable neighbourhoods and healthy high streets.

1.2. Ward-level health profiles

We have included below extracts from local health profiles for East Hampshire. These provide health data at ward-level. The wards identified in the table below perform particularly poorly on specific health indicators. All of these wards below are geographically linked to potential large development sites. We recommend these health and wellbeing challenges are taken into account when considering the needs at individual potential sites.

The health and wellbeing challenges in these areas can be broadly distinguished as:

- Income deprivation
- Overweight and obesity in children and adults
- Low levels of physical activity in children and adults
- High proportions of older people living alone, which could suggest potential for high social isolation
- Self-harm, indicating poor mental health
- High levels of limiting long-term illness/disability

This suggests a need for developments in the areas included within the consultation to promote social cohesion, healthy lifestyles and inclusive communities.

Table 1. Relevant ward-level health data for East Hampshire

Ward	Performance
Alton Eastbrooke	<ul style="list-style-type: none"> • Income deprivation is higher than national average • % of older people living alone is higher than national average • Rate of all-cause hospital admissions is worse than national average • Rate of emergency hospital admissions for COPD is worse than national average • Rate of hospital stays for self-harm are higher than national average • % of people who report having a limiting long-term illness or disability is higher than the national average • Life expectancy for males and females is lower than national average • All-cause mortality is higher than the national average • Rate of deaths from stroke is higher than national average
Alton Westbrooke	<ul style="list-style-type: none"> • % of older people living alone is higher than national average • Rate of hospital stays for self-harm are higher than national average • % of people who report having a limiting long-term illness or disability is higher than the national average
Alton Wooteys	<ul style="list-style-type: none"> • Rate of hospital stays for self-harm are higher than national average • % of people who report having a limiting long-term illness or disability is higher than the national average • All-cause mortality is higher than the national average
Binstead and Bently	<ul style="list-style-type: none"> • All-cause mortality is higher than the national average • Rate of deaths from stroke is higher than national average
Horndean, Hazelton and Blendworth	<ul style="list-style-type: none"> • % of people who report having a limiting long-term illness or disability is higher than the national average • All-cause mortality is higher than the national average • Rate of deaths from stroke is higher than national average
Whitehill Chase	<ul style="list-style-type: none"> • % of older people living alone is higher than national average
Whitehill Deadwater	<ul style="list-style-type: none"> • Income deprivation is higher than national average
Whitehill Pinewood	<ul style="list-style-type: none"> • Rate of childhood development at age 5 is lower than national average • Rate of emergency hospital admissions for COPD is worse than national average

Source: PHE Local Health Profiles

More information on ward-level health data for East Hampshire can be found at <https://fingertips.phe.org.uk/profile/local-health/data#page/0/gid/1938133180/pat/201/par/E07000085/ati/8/are/E05004459/iid/93113/age/244/sex/2>.

Hart DC response to Large Sites consultation

[Redacted]

Fri 11/10/2019 10:09

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: Potts, Victoria <Victoria.Potts@easthants.gov.uk>; Stevens, Heather <Heather.Stevens@easthants.gov.uk>

 1 attachments

Hart response to East Hants Large Sites Consultation Oct 2019.pdf;

Hi,

Please find attached Hart District Council's response to the Large Sites Consultation.

[Redacted]

Planning Policy Manager

Hart District Council

[Redacted]

<http://www.hart.gov.uk>

Twitter: [@HartCouncil](https://twitter.com/HartCouncil)

Facebook: [/HartDistrictCouncil](https://www.facebook.com/HartDistrictCouncil)

Hart District Council response to East Hampshire Large Development Sites Consultation (Regulation 18) 3 September to 15 October 2019

11/10/19

1. Hart District Council supports East Hampshire District Council's intention to meet all of its development needs without recourse to neighbouring authorities.
2. However it does have major concerns regarding the suitability of Northbrook Park for significant development in respect of traffic impact given the nature of rural lanes running north into Hart from the vicinity of the site. The lanes and villages in this southern part of Hart are unsuited to additional traffic generation and it is difficult to see how in a practical sense these roads could be suitably mitigated. In the absence of a Transport Assessment and clarity on what mitigation can be provided the Council oppose the potential allocation of this site, particularly given the presence of several alternative options.
3. Traffic impact is probably the only cross-boundary issue of concern to Hart. However we note there is little or no information provided in the consultation on landscape impacts associated with the site. If the site is allocated in the Regulation 19 Draft we would expect the supporting evidence at that time to have assessed the landscape impacts of all site options.
4. In respect of the sustainability of the site, whilst the Council understands the merits of new settlements vis a vis urban extensions, in the case of Northbrook Park we have strong doubts as to whether the development will be of sufficient scale (800 homes) to support on-site infrastructure, sustainable transport, jobs, school, shops etc. in the short, medium and long term. For example, will an on-site primary school be viable in the long term as demographics of the site change over time? If it will at some point rely on children from elsewhere it is clearly not well located for that purpose.
5. Finally, we also note that Northbrook Park scores more 'reds' on the site scoring matrix than any other of the site options.
6. As a neighbouring authority we look forward to future discussions as your plan progresses to the next stage, in particular on the transport work that will support the Regulation 19 version of the plan.

██████████, Portfolio Holder for Place

Hampshire County Council Response on the EHDC Large Development Sites Consultation

[REDACTED]

Tue 15/10/2019 16:25

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: Planning Consultations <planningconsultations@hants.gov.uk>

📎 2 attachments (301 KB)

PH Response to East Hants Large Development Sites Consultation Oct 2019.docx; HCC Response - EHDC Reg 18 Large Sites Consultations - October 2019.pdf;

Dear Sir / Madam,

Please find attached the Hampshire County Council Response on the EHDC Large Development Sites Consultation.

I also attach a note from Public Health which provides an overview of health and wellbeing challenges at ward-level for the relevant areas. Public Health have not at this stage made any specific recommendations, other than to consider these health and wellbeing needs and challenges.

Thank you

Regards

[REDACTED]

[REDACTED]
Principal Planning Policy Officer

01962 846738

[REDACTED]

Strategic Planning

First Floor, Ell Court West,
The Castle, Winchester SO23 8UD



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Julia Mansai
Planning Policy
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GU31 4EX

*Economy, Transport and Environment Department
Elizabeth II Court West, The Castle
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Textphone 0300 555 1390
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Enquiries to

[REDACTED]

My reference

EHDC-LARGESITES

Direct Line

01962 846738

Your reference

Date

15 October 2019

Email

[REDACTED]

Dear Julia,

Hampshire County Council Response to East Hampshire District Council Local Plan Large Development Sites Consultation

The following response is provided on behalf of Hampshire County Council to the **East Hampshire Local Plan Large Development Sites Consultations**, in its capacity as Local Highway Authority, Adult Services provider, Local Education Authority and Minerals and Waste Planning Authority.

The County Council would like to make clear at this stage that the comments provided in the attached table are limited to general overarching comments on some of the principles of the large development sites rather than site specific assessments. However, the County Council would like to arrange a roundtable meeting with East Hampshire District Council to discuss the individual sites in more detail prior to potentially supplementing our initial response with a more considered and technical assessment for each site. However, I would like to draw your attention to the following comments regarding Whitehill and Bordon and Alton.

It is important to note that the Local Highway Authority's Transport Strategy for Whitehill and Bordon is based and tested against the 'current' quantum of development set out in the Masterplan. The Local Highway Authority is concerned that additional development at that location could prejudice the delivery of the Transport Strategy, particularly elements relating to the local highway network.

Therefore, should the local planning authority be minded to allocate future sites in Whitehill and Bordon, it will be necessary to review the existing Transport Strategy and undertake new site allocation or options report, and that new masterplanning and

Transport Assessment work would need to be undertaken to help the Local Highway Authority understand the transport consequences of the additional development.

Additionally, the County Council would like to work with East Hampshire District Council to develop a transport package of measures for Alton to address the existing through traffic and mitigate the impacts of any potential future large development sites and growth in the town.

Further detailed comments are provided in the attached table. If you have any queries or concerns regarding the above, please do not hesitate to contact my colleague [REDACTED]

Yours sincerely,

[REDACTED]

Head of Strategic Planning

**East Hampshire District Council Reg 18 Large Sites Consultation
Hampshire County Council Response – October 2019**

	Comment
General Comments – Highway Authority	<p>The County Council as the local Highway Authority has not been able to provide an assessment of each of the large development sites that have been nominated by site promoters at this stage as there is currently not enough technical evidence provided in the submissions to make a robust assessment of the impacts on the highway network of each proposed large development; and / or assess the package of proposed mitigation measures that will need to be agreed and provided as part of the final planning application to bring any of the proposed developments forward successfully.</p> <p>Hampshire County Council would therefore like to arrange a focussed meeting with East Hampshire District Council on the large development sites to consider the technical issues in more detail and help East Hampshire District Council develop an evidence base that enables the impact of each of the proposals on the highway network to be quantified and to ensure that the necessary mitigation measures that will be required to support the developments can be agreed upfront as part of the assessment of the large development sites at this stage, but also critically when considering the masterplanning principles for each of the large sites that do proceed through the local plan process, so that the technical details and transport impacts are considered fully and upfront throughout the plan making and masterplanning process.</p> <p>The County Council would recommend that to fully assess the impacts of each of the proposed large development sites at this stage of the process, the proposed large development site proposals should still be supported by robust transport appraisals. A transport appraisal should consider the sustainable transport and masterplanning principles with some suggested essential mitigation packages that could be assessed and agreed by the Highway Authority at an early stage. This could then help inform and assist in the assessment of the large development sites from a transport and accessibility perspective as the District Council will be further assessing as part of the next stage of the plan making process.</p> <p>It should be noted however that the County Council does have some site specific general considerations for both Alton and Whitehill and Bordon which are set out below:</p> <p><u>Alton</u></p> <p>Alton experiences significant levels of strategic through traffic due to its geographic location. The County Council would therefore like to work with East Hampshire District Council to develop an Alton transport package of measures to address the existing through traffic and mitigate the impacts of any future large development sites and growth in the town.</p>

The County Council is of the view that there is a need for significant levels of funding to mitigate the transport impacts of any proposed large developments in Alton. The County Council has identified the need for substantial transport infrastructure to support future growth, which includes the following:

- A31 / B3004 Caker Lane new junction;
- Anstey Road / Anstey Lane junction signalisation;
- Paper Mill Lane / Wilsom Road / Mill Lane / Ashdell Road junction improvement;
- A339 / B3349 junction improvement;
- B3349 New Odiham Road / Basingstoke Road junction improvement; and
- Chawton Park Road / Whitedown Lane junction improvement.

Whitehill and Bordon

The County Council consider that any increase to the existing quantum of development in Whitehill and Bordon through additional large development sites could potentially help achieve the levels of critical mass which make sustainable transport options more achievable for Whitehill and Bordon.

However, the County Council recommend that any future additional large development sites will need to effectively support and complement the existing development masterplan for Whitehill and Bordon as a whole, including the associated transport strategy.

Additional development beyond the current masterplan will need to be located carefully and designed effectively so as to adhere to the principles incorporated in the existing Transport Strategy. The County Council are concerned that any failure to integrate new additional developments beyond the current masterplan for Whitehill and Bordon could potentially prejudice the delivery of the existing Transport Strategy, particularly elements relating to new accesses onto the relief road that has been built in Whitehill and Bordon.

If new additional developments are not carefully considered and masterplanned the County Council is concerned that the Whitehill and Bordon Relief Road could cease to offer a relief function for the town and would effectively become a development road to service the new additional development which would have impacts on the overall objectives of the Whitehill and Bordon masterplan.

<p>General Comment – Adult Services</p>	<p>Hampshire County Council has a statutory duty to provide adult social care and social work to support Hampshire residents. The County Council owns and manages a range of care and support facilities across the county. In order to meet the changing needs of communities, and in particular, the needs of ageing population it is vital that plan policies relating to large sites both encourage and, where appropriate, require the provision of suitable housing, including affordable adult extra care housing. It is also important that the strategic allocation of large sites enables the opportunity to ensure all new housing is accessible to all members of the community (as per Building Regulations Part M4(2) and Part M4(3)).</p> <p>When considering the allocation of large development sites (and specifically sites that are well connected and integrated to existing or other proposed communities, services and facilities) the County Council consider that specialist housing provision should be made for supported housing, including affordable extra care housing for older persons and supported housing to meet the specific needs of those adults with mental health, learning or physical disability. Large development sites can ensure that a range of housing needs are met but also support the objective of creating a mixed, balanced community whose changing requirements over time, as the community evolves and matures, can be met.</p> <p>Hampshire County Council Adult Services have identified an affordable housing need within the adult extra care and supported needs sector within East Hampshire. Poor affordability means the need to provide such housing is particularly acute for those who needs are not met by the market. Where there is an identified need and the site is of sufficient size and in a suitable location to accommodate affordable extra care housing, such housing should normally be provided, to meet the affordable housing requirements of those households in need of supported accommodation, whose needs are not met by the market.</p> <p>The focus of this County Council Adult Services response is therefore on the identified Affordable Extra Care Housing for Older Persons and supported housing to meet the specific needs of those adults with mental health, learning or physical disability, not the wider market needs as identified in the SHOP data for East Hampshire. It should however still be noted that based on the SHOP data for East Hampshire (which includes the SDNPA area in that data) there is a significant increase in unmet needs over the EHDC plan period across the different types of older persons accommodation.</p> <p>In terms of a specific requirement for affordable adult extra care accommodation on individual large development sites it may be prudent at this stage to focus attention on the large development sites that are the most likely to be allocated through the EHDC assessment process. With this in mind as the site selection process continues the County Council would like to work with EHDC to understand the prospect of each site becoming an allocation as this will enable the County Council to carefully consider what the realistic timeframes for housing delivery of each large site ultimately chosen may be so that the County Council can ensure that the appropriate provision of Affordable Extra Care Housing for Older Persons and supported housing to meet the specific needs of those adults with mental health, learning or physical disability can be planned for.</p>
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In the shorter term the County Council would suggest that large sites in established larger settlements such as Alton and Whitehill and Bordon would be preferable in terms of their location and access to services in comparison to Horndean and Four Marks when considering the provision of specialist accommodation, although it is important to consider that greater needs may emerge in other locations over the plan period.

Finally, the County Council consider that small scale affordable supported housing for younger adults (that meet the needs of those with mental health, learning or physical disability) works well around the 12-person model. It is the County Council's experience that this scale of supported housing provides a scheme where there can be mutual support, and an economic model of care provision whilst avoiding an institutional setting. However, it is important to note that some County Council schemes that come forward are slightly larger and some slightly smaller depending on the needs that exist at the time that a site is being brought forward for development.

In relation to the specific proposed allocations the County Council (Adult Services) therefore provides the following comments:

Whitehill and Borden

The County Council welcome the objective of meeting the housing needs of everyone developing a balanced community. It is noted that there is reference to a C2 care home, though no more detail is provided so the County Council cannot make any further detailed comments at this stage.

The provision of Affordable Extra Care Housing for Older Persons should be a requirement of the site allocation policy. This should be around 80 homes. This would normally be expected to fall within Use Class C3.

The County Council recommends that affordable supported housing of a smaller scale (around 12 homes) should be provided to meet the specific needs of those with mental health, learning or physical disability.

Land East of Horndean

The provision of Affordable Extra Care Housing for Older Persons should be a requirement of the site allocation policy. This should be around 60 homes. This would normally be expected to fall within Use Class C3.

The County Council recommends that affordable supported housing of a smaller scale (around 12 homes) should be provided to meet the specific needs of those with mental health, learning or physical disability.

	<p><u>Housing at Alton – 1) Chawton Park and 2) Neatham Down</u></p> <p>Alton is an area of particularly high housing need for affordable extra care accommodation for older persons. Provision should be made as part of one of these large site allocations (around 60 units). It is noted, and welcomed, that the Neatham Down promoters refer to inter-generational living. Locational factors influencing the best location for extra care housing include shops, services and facilities that are to be provided as part of the broader development and the relationship / accessibility to existing services and facilities in Alton is an important consideration.</p> <p>The County Council recommends that affordable supported housing of a smaller scale (around 12 homes) should be provided to meet the specific needs of those with mental health, learning or physical disability.</p> <p><u>Four Marks - 1) South and 2) South of Winchester Road 3) South Medstead 4) West of Lymington Bottom Farm</u></p> <p>The proposal for extra care housing in both proposed allocations is welcomed. There should be the opportunity to consider this as part of the affordable housing element (1 scheme in total - around 60 units). This would normally be expected to fall within Use Class C3.</p> <p>The County Council recommends that affordable supported housing of a smaller scale (around 12 homes) should be provided to meet the specific needs of those with mental health, learning or physical disability.</p> <p>In summary, the County Council is committed to working with the Local Planning Authority to develop local plan policies in East Hampshire that enable the appropriate type of accommodation to come forward and the County Council will continue to engage with East Hampshire District Council to develop robust policies including, where appropriate the inclusion of a site-specific criteria for provision of specialist accommodation.</p>
<p>General Comment – Education Authority</p>	<p>Hampshire County Council as the Local Education Authority has a statutory duty to ensure there are sufficient school places in the county to meet current and future demand. It is the role of the County Council to plan, organise and commission places for all maintained schools in Hampshire in a way that raises standards, manages rising and declining pupil numbers and creates a diverse school community.</p> <p>In terms of school place planning methodology, the County Council considers that new large site housing proposals being brought forward should be of a minimum 700 eligible dwellings and in multiples of 700 dwellings. An eligible dwelling is one of 2+ bedrooms. The County Council is aware that this sounds like an arbitrary number however it is the experience of the County Council school place planning experts that 700 eligible dwellings will yield a sufficient number of pupils to fill a 1 form entry (fe) (210 place) primary school. As 1fe primary schools are financially challenging establishments to run the County</p>

	<p>Council would always prefer and recommend the building of a 2fe (420 place) primary school serving a development area of 1,400 eligible dwellings. The County Council has met with East Hampshire District Council and is hopeful that EHDC recognise the minimum number of dwellings on large development sites being brought forward that would be most effective for school place planning.</p> <p>As you will be aware, amended Community Infrastructure Levy (CIL) Regulations came into force on 1 September 2019 which removed Regulation 123. This therefore removed the pooling restrictions for section 106 obligations and renders Council's Regulation 123 list obsolete. The County Council has previously raised concerns about the Council's approach to CIL as it only allowed new schools associated with the Whitehill Bordon regeneration development to be secured through section 106. All other developments were linked to the CIL Regulation 123 list and the County Council as the local Education Authority could never secure sufficient capital funding from East Hampshire District Council through this route to provide new schools to support large new development sites. In light of the changes to the Regulations, the County Council intends to secure section 106 obligations from all developments that require the delivery of new school places in order to mitigate the impact upon education facilities in accordance with its Developers' Contributions towards Children's Services Facilities guidance.</p> <p>The County Council as Local Education Authority also proposes that for each large site proposal (and as per section 23 of the Department for Education (DfE) document "Securing developer contributions for education") it will seek a site larger than is required just to mitigate each of the potential large site developments, in order to future proof later housing and in line with good planning practice.</p> <p>The County Council as Local Education Authority sets out the following assessment below of each potential large development site in terms of school place planning requirements / education infrastructure:</p>
Northbrook	<p>This is a development of 800 dwellings so will work as a new 1fe primary school as it is likely that there will be at least 700 eligible dwellings. A site of at least 1.2ha of useable area should be made available to build a 1fe primary school but as stated above I will be seeking a site of approximately 1.6ha to allow future expansion.</p>
Whitehill and Bordon expansion	<p>This is a potential additional 1,300 dwellings which will generate the need for another 2fe primary school (2ha) on another site (on top of the site already identified as part of the existing plans). The existing plans suggest an expansion of the Bordon Infant and Junior Schools together with a new site (already set aside) for another 3fe primary school.</p>
Chawton Park Farm	<p>An additional 1,200 dwellings will require a new 2fe primary school set on 2.8ha of land (this size of site will allow a future expansion to a 3fe school if required). The County Council refer East Hampshire District Council to our comment regarding the optimum number of dwellings for school place planning methodologies. In the case of Chawton Park Farm this would be a slightly larger development i.e. 1,400 eligible dwellings.</p>

Land East of Horndean expansion	As this proposal might potentially result in up to another 1,000 dwellings (proposed on land adjacent to the site currently going through the planning process) this will require a new 1.5fe primary school with a minimum area of 1.6ha. The County Council will be seeking a 2ha site just in case there is a need to expand the school in the future.
Land South-East of Liphook	This is a development proposal of 600 dwellings with a proposal to either provide a new 1fe primary school (as a satellite to Bohunt on a site size of 1.6ha) or expansion of 1fe of the Liphook Infant and Junior Schools. The site at Liphook is large enough to accept a 1fe expansion so the promoters of this site may wish to consider providing additional dwellings on the site they have set aside for the new primary school to get closer to the 700 dwellings required to provide sufficient pupils for a 1fe expansion.
Neatham Down	This is a development proposal of 600 dwellings on the other side of the A31 from all other schools. Therefore, a new 1fe primary will be required but, the County Council reiterate the point made previously about the number of dwellings required to support a 1FE school. It is recommended that the number of dwellings would therefore need to be increased to ensure the school is full. The County Council will be seeking a site area of 1.6ha.
Four Marks South	This development proposal is for 800 dwellings. On face value this will provide sufficient pupils to fill a 1fe primary school. At present the promoters are suggesting a relocation of Four Marks Primary School (soon to be a 2fe following a proposed expansion) but they are only suggesting a new 2fe primary school. The school would need to be a 3fe primary school and the County Council will be seeking the site and school (at 3fe) to be funded by the developer. The County Council could not pay for the relocation of Four Marks Primary as the County Council would not secure sufficient capital receipt from the site to rebuild it on another site. The County Council will be seeking a school site of 2ha.
Winchester Road, Four Marks	<p>This development proposal is for 600/700 dwellings. On face value this should just work but the development straddles the A31 (so a new crossing point will be required) and any new school associated with this development will put it very close to both the existing Four Marks Primary and Ropley Primary Schools. If this development is brought forward (and not Four Marks South at the same time) the County Council will be seeking a site area of 1.6ha.</p> <p>Should both developments in Four Marks come forward then a new 2fe primary school (2.8ha) on the Four Marks South site would be helpful and the County Council would look at potentially changing the catchment area of the existing school.</p>
Land West of Lymington Bottom, Medstead	This development proposal is for 650 dwellings so the County Council do not consider it is quite large enough to provide a 1fe primary school but if this proposal is brought forward then the County Council will be seeking a site size of 1.6ha.

<p>South Medstead</p>	<p>This development proposal is for 600 dwellings. The County Council consider that this is another site with not quite enough dwellings to fill a 1fe primary school. If this proposal is brought forward, then the County Council would require a site requirement of 1.6ha. f both sites are brought forward in Medstead then a new 2fe primary (2.8ha) could be provided to serve both sites. The County Council cannot expand Medstead Primary School as it sits on a very restricted site so any development in Medstead will require a new primary school.</p>
<p>General Comment – Minerals Safeguarding</p>	<p>Hampshire County Council as the Minerals and Waste Planning Authority has not made a detailed assessment of the potential for prior extraction at any of the large development sites as part of this consultation. However, the County Council is very willing to work with East Hampshire to provide any information that would assist the District Council in the assessment of the large sites as part of their local plan preparation.</p> <p>As per the County Council's response on the draft Local Plan (19 March 2019) the County Council would recommend that the requirement for further investigation or a mineral assessment should be included as site specific criteria in local plan policies to support site allocations (alongside other site investigations) and this would then effectively support a large site planning application in the future.</p>

Hampshire Public Health Response to East Hampshire Large Development Sites Consultation
Local Plan 2017-2036 October 2019

Consultation:	East Hampshire Large Development Sites Consultation
Comments by:	Hampshire County Council Public Health
Date of Comments:	14 th October 2019
Correspondence to:	Lynn.butler@hants.gov.uk

Thank you for the opportunity to respond to this consultation on options for large development sites in East Hampshire.

In response to this consultation, we have provided below relevant health needs and challenges for the areas being considered. We hope this will help to guide the requirements for social, community and transport infrastructure, as well as potential future site-specific policies and master planning. Emerging local plan policy (policy S4) in East Hampshire recognises the roles of spatial planning in health and wellbeing and emphasises healthy lifestyles, including making provision within new developments for walking and cycling, active travel, community spaces and green infrastructure.

1.1. Health and demographic profile for East Hampshire

Health in East Hampshire is generally good, with average life expectancy across the district being higher than the national average. East Hampshire also has a higher proportion of older adults and lower proportion of working-aged adults than the national average. The proportion of people aged over 65 is expected to further increase for East Hampshire over the lifetime of the local plan. This ageing population will define the way in which residents interact with the physical environment and will also define infrastructure needs.

Additionally, across the district there is a trend of rising rates of childhood obesity. Meanwhile, more than two thirds of adults in East Hampshire are overweight or obese. This highlights the distinct need for developments that support healthy weight and physical activity. For example, walkable neighbourhoods and healthy high streets.

1.2. Ward-level health profiles

We have included below extracts from local health profiles for East Hampshire. These provide health data at ward-level. The wards identified in the table below perform particularly poorly on specific health indicators. All of these wards below are geographically linked to potential large development sites. We recommend these health and wellbeing challenges are taken into account when considering the needs at individual potential sites.

The health and wellbeing challenges in these areas can be broadly distinguished as:

- Income deprivation
- Overweight and obesity in children and adults
- Low levels of physical activity in children and adults
- High proportions of older people living alone, which could suggest potential for high social isolation
- Self-harm, indicating poor mental health
- High levels of limiting long-term illness/disability

This suggests a need for developments in the areas included within the consultation to promote social cohesion, healthy lifestyles and inclusive communities.

Table 1. Relevant ward-level health data for East Hampshire

Ward	Performance
Alton Eastbrooke	<ul style="list-style-type: none"> • Income deprivation is higher than national average • % of older people living alone is higher than national average • Rate of all-cause hospital admissions is worse than national average • Rate of emergency hospital admissions for COPD is worse than national average • Rate of hospital stays for self-harm are higher than national average • % of people who report having a limiting long-term illness or disability is higher than the national average • Life expectancy for males and females is lower than national average • All-cause mortality is higher than the national average • Rate of deaths from stroke is higher than national average
Alton Westbrooke	<ul style="list-style-type: none"> • % of older people living alone is higher than national average • Rate of hospital stays for self-harm are higher than national average • % of people who report having a limiting long-term illness or disability is higher than the national average
Alton Wooteys	<ul style="list-style-type: none"> • Rate of hospital stays for self-harm are higher than national average • % of people who report having a limiting long-term illness or disability is higher than the national average • All-cause mortality is higher than the national average
Binstead and Bently	<ul style="list-style-type: none"> • All-cause mortality is higher than the national average • Rate of deaths from stroke is higher than national average
Horndean, Hazelton and Blendworth	<ul style="list-style-type: none"> • % of people who report having a limiting long-term illness or disability is higher than the national average • All-cause mortality is higher than the national average • Rate of deaths from stroke is higher than national average
Whitehill Chase	<ul style="list-style-type: none"> • % of older people living alone is higher than national average
Whitehill Deadwater	<ul style="list-style-type: none"> • Income deprivation is higher than national average
Whitehill Pinewood	<ul style="list-style-type: none"> • Rate of childhood development at age 5 is lower than national average • Rate of emergency hospital admissions for COPD is worse than national average

Source: PHE Local Health Profiles

More information on ward-level health data for East Hampshire can be found at <https://fingertips.phe.org.uk/profile/local-health/data#page/0/gid/1938133180/pat/201/par/E07000085/ati/8/are/E05004459/iid/93113/age/244/sex/2>.

FORMAL RESPONSE: #8485 East Hampshire District Council Local Plan (Large Development Sites Consultation)

[REDACTED]
Thu 19/09/2019 15:10

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [REDACTED]

Our Reference: 8485

FAO: Planning Policy Team

East Hampshire Local Plan (Large Development Sites) Consultation

Dear Sir or Madam

Thank you for inviting Highways England to comment on the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3, A27, M3 and M27.

We have reviewed this consultation and its supporting documentation and have the following comments. The ten sites that are under consideration in this Consultation are listed below, numbered as per Figure 1 of the *Large Development Sites Consultation*, Local Plan 2017-2036 (regulation 18) document, together with the main traffic generating land uses and their likely level impact on the SRN:

1. **Northbrook Park, Bentley** (800 Homes, New primary School, 2.6Ha Employment, Hotel and village centre accommodating a pub, shops and hi-tech village Work Hub) - This large site straddles the A31 to the east of Bentley and is distant from the A3 and M3, therefore the impact on SRN is expected to be minimal.
2. **Chawton Park Farm, near Alton** (1200 Homes, 1Ha Employment land, New primary School and a local centre) - This site is close to A31 but approximately equidistant between the M3 and A3, therefore the impact on SRN is expected to be minimal.
3. **Neatham Down, near Alton** (600 Homes, 1Ha Employment land, New primary School and a pub/local shop) - This site is close to A31 but approximately equidistant between the M3 and A3, therefore the impact on SRN is expected to be minimal.
4. **West of Lymington Bottom Road**, South Medstead (650 Homes, 2Ha Employment land, a New primary School and the expansion of Local Centre) - This site is close to A31 but approximately equidistant between the M3 and A3, therefore the impact on SRN is expected to be minimal.
5. **South Medstead** (600 Homes, 2Ha Employment land and a New primary School) - This site is close to A31 but approximately equidistant between the M3 and A3, therefore the impact on SRN is expected to be minimal.

6. **Land South of Winchester Road, Four Marks** (600-700 Homes, 2Ha Employment land, a new primary school and pre-school and a local centre) - This site straddles the A31 but approximately equidistant between the M3 and A3, therefore the impact on SRN is expected to be minimal.
7. **Four Marks South** (700-800 Homes, 1Ha Employment land, care home and extra care facility) - This site is close to A31 but approximately equidistant between the M3 and A3, therefore the impact on SRN is expected to be minimal.
8. **Whitehill & Bordon extension** (1284 Homes, 3.1Ha Employment land and potential C2 use) - This large site is to the north of the A3/A325 and A3/Farnham Road junctions and **will impact on the A3 at these junctions, particularly the A3/A325 Longmoor Junction**. Highways England will therefore expect to be consulted if this site comes forward for development.
9. **Land South East of Liphook** (600 Homes, Community hub, New primary School and 2Ha Employment) - This large site is to the southeast of Liphook and **will impact on the A3 junctions at Liphook**. Highways England will therefore expect to be consulted if this site comes forward for development.
10. **Extension to Land East of Horndean** (Hazleton Farm) (1000 Homes, 1.63Ha Employment land and a local centre) – This large site to the southeast east of Horndean **will impact on the A3 (M) Junction 2**. Highways England will therefore expect to be consulted if this site comes forward for development.

Highways England highlights that the two development sites at Alton (sites 2 and 3) which will result in about 1,800 homes, and the four developments at Four Marks, (sites 4 to 7) which will result in about 2,750 homes need to be considered and assessed cumulatively as they may have an impact on the SRN that needs to be assessed and potentially mitigated against during the Local Plan process. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth in East Hampshire without careful consideration of mitigation measures. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible.

Highways England in general, will support a local authority proposal that considers sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort.

We have reviewed the information provided. Individually, many of the sites due to their size and/or location would unlikely materially impact the operation of the SRN. However, consideration should to be given to assessing the cumulative impact of new proposals together with already planned growth in East Hampshire on the SRN. We request that we continue to be consulted as these sites are progressed both through the Local Plan process and when they are brought forward after it. Once preferred sites are identified we would expect to be consulted and a Transport Assessment undertaken and provided for our information.

Regards

[REDACTED]
Highways England | Bridge House | Walnut Tree Close | Guildford GU1 4LZ
[REDACTED]

Web: www.highwaysengland.co.uk



Registered Office: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
Highways England Company Limited registered England and Wales number 09346363

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East Hampshire Local Plan (Large Development Sites Consultation)

[REDACTED]@HistoricEngland.org.uk>

Mon 14/10/2019 15:32

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (101 KB)

East Hampshire Local Plan (Large Development Sites Consultation) (HE response)-14.10.19.pdf;

Dear Sir or Madam

I attach a letter setting out Historic England's response to the above consultation.

Yours faithfully,

[REDACTED]
Historic Environment Planning Adviser
Regions Group, London and South East Region
Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Direct Line: 020 7973 3654



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Historic England

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

[By email only to localplan@easthants.gov.uk](mailto:localplan@easthants.gov.uk)

Our ref: PL00332222

Your ref:

Telephone 020 7973 3700

Email e-seast@historicengland.org.uk

Date

14 October 2019

Dear Sir or Madam

East Hampshire Local Plan (Large Development Sites Consultation)

Thank you for your email of 3 September 2019 inviting comments on the above document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document.

Historic England's comments are set out detail below.

The National Planning Policy Framework states that all policies in local plans should be underpinned by a relevant and up-to-date evidence base. As regards the historic environment, it further requires local planning authorities to maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

We note that one of the stated purposes of the consultation is "To gather useful information to help build the Local Plan evidence base" (page 6). However, we can find reference no to historic environment-related evidence documents or studies identified in the Council's



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Environment Evidence base on the Evidence base webpage, although it explains that the environmental evidence base studies cover heritage.

Sources of evidence for the historic environment should include the National Heritage List for England (www.HistoricEngland.org.uk/listing/the-list), the Hampshire Archaeology and Historic Environment Record, the Hampshire Integrated Character Assessment, Hampshire County Council's Hampshire Register of Historic Parks and Gardens, the Historic England Heritage at Risk Register, conservation area character appraisals and management plans and any archaeological assessments, extensive urban studies etc. Is there a list of locally important heritage assets? Has the Council undertaken a survey of Grade II buildings at risk?

When gathering evidence, it is important to bear in mind that this is not simply an exercise in setting out known sites but, rather, in understanding the value to society (i.e. the significance) of sites both known and potential, without which an understanding of the sometimes subtle qualities of the local distinctiveness and character of the local area may be easily lost. It may be helpful to collate this information within a Heritage Topic Paper to draw together the evidence prepared and the subsequent implications and actions required.

It should also be remembered that the definition of "historic environment" in the National Planning Policy Framework is wide-ranging, encompassing more than just the built environment: *"All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora."*

We will expect the Council to have an adequate, up-to-date and relevant historic environment evidence base and to demonstrate in the Local Plan how that historic evidence base has informed and influenced the Plan's policies and site allocations. If the evidence base for the historic environment is not adequate, the Council will need to commission proportionate research, for example:

- detailed historic characterisation work assessing the impact of a proposal for a major urban extension or rural development;
- heritage impact assessments, considering the potential impact of allocations on the significance of heritage assets; and/or
- an appropriate archaeological assessment to consider whether heritage assets with archaeological potential are likely to be present in areas where the HER indicates that there has been little or no previous investigation.

We believe that it would be helpful if the Large Development Sites Consultation made explicit the nature and extent of the evidence on the historic environment on which its policies and site allocations are based, and detail the assessment that has been undertaken to identify, avoid or mitigate impacts arising from the development of sites.



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Telephone 020 7973 3700 HistoricEngland.org.uk

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Specific Sites with identified heritage significances of national or regional importance that we wish to highlight include the following (note this is not an exhaustive list and all sites should be screened for heritage significances that may be impacted):

Whitehill & Bordon: The Bordon Garrison site contains a number of barrow scheduled monuments. In our comments on planning application SDNP/14/06604/FUL we stated “A number of scheduled Bronze Age barrows (burial mounds) will potentially be affected by the scheme. Areas that are zoned for housing at or near to the Barrow cemetery at Bolley Avenue could cause harm to the barrows. In one case there is the potential for substantial harm. Detailed design of the scheme should address these concerns and seek opportunities to enhance the setting of the monuments. The impact on other monuments is assessed to be neutral”. However, we understand that this application was approved and is currently being implemented.

The Land East of Horndean Road, Rowlands Castle: the site is within the setting of the Grade II listed Pyle Farmhouse and two other listed structures. The development of this site should preserve or enhance the setting of these buildings and this should be included as a requirement in the allocation policy if this site is taken forward.

Northbrook Park, Bentley: The Land at Northbrook Park, Bentley site contains a range of Grade II listed buildings (Northbrook Farm Cottages, barn, stables Northbrook and The Lodge). The development of this site should retain these buildings and preserve or enhance their setting, which would be expected to be in an open landscape. This should be a requirement in the allocation policy if this site is taken forward.

However, there is provisional archaeological survey evidence to suggest a very large enclosure of likely prehistoric date to the south of the A31. This is currently not designated but likely to be of national importance and which should therefore be considered subject to the policies in the National Planning Policy Framework applying to scheduled monuments. We consider that further archaeological investigation of this site should be undertaken before this site is taken forward as an allocation to provide further evidence on whether or not this feature should be scheduled and how it would affect the developable area (and therefore quantum) of this site.

Chawton Park: The Land at Wolf’s Lane, Chawton site appears to be within the setting of the Chawton Conservation Area. We note that there is no detailed Character Appraisal for the Conservation Area and, as we have not been able to visit this site, we are unclear as to the contribution this site in its undeveloped form makes to the character and appearance of the Conservation Area. If this assessment has not yet been undertaken, we consider that it should be before this site can be considered suitable for development.

The development of this site may also detract from the experience of visiting historic Chawton, which is one of Hampshire’s premier visitor attractions. Has any assessment been undertaken of this potential impact? If it is shown that there would be an adverse impact, although the Jane Austen connection would still be a very strong draw, this could potentially threaten the viability of the museum at the Grade II* listed Chawton House, set within a Grade II Registered Historic Park and Garden.



Land South of Winchester Road, Four Marks: a number of listed buildings are located adjacent to the site, principally in the parish of Ropley to the west of the development area (e.g. Ropelia Cottage, Manor Farm House, North Street Farm House, Stables west of North Street Farm House, Turnpike Cottage – all Grade II). An assessment of the potential impacts of the development of housing in this area on the settings of these heritage assets should be undertaken.

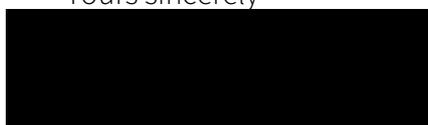
The presence of, or potential for, locally significant heritage assets on the above sites is not identified within this submission. The council's conservation adviser would be best to advise on this. If the Conservation Officer is satisfied that the sites could be developed without an unacceptable adverse effect on the character and appearance of Conservation Areas, locally listed buildings or other non-designated heritage assets this requirement should be included in the allocation policy, as should a requirement to preserve or enhance the setting of the heritage assets.

For all the sites, the potential for non-designated archaeological remains should be considered, with reference to the Hampshire Historic Environment Record. For the greenfield sites, reference should be made to the Hampshire Integrated Character Assessment. The Council's Conservation Officer and the Hampshire County Council Archaeologist should be consulted.

We have prepared specific advice on The Historic Environment and Site Allocations in Local Plans, <http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>. Advice on the setting of heritage assets is given in Historic England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, <http://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>.

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

Yours sincerely



Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 HistoricEngland.org.uk

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Large Sites Consultation

[REDACTED]@hiwwt.org.uk>

Tue 15/10/2019 17:38

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (329 KB)

191007 Large Development Sites Consultation [REDACTED].pdf;

Dear East Hampshire DC Planning Policy Team,

Please find attached Hampshire & Isle of Wight Wildlife Trust's response to the EHDC Large Sites Consultation.

If there are any points which need following-up in any way, please do get in touch.

Kind regards,

[REDACTED]
Senior Policy & Evidence Advisor

[REDACTED]
01489 774433

[REDACTED]
Hampshire & Isle of Wight Wildlife Trust, Beechcroft House, Vicarage Lane, Curdridge, Hampshire SO32 2DP



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15th October 2019

Dear sir / madam,

East Hampshire Large Development Sites Consultation

Thank you for the opportunity to comment on the proposed large sites for East Hampshire. The Wildlife Trust is not able to comment in detail on each site, but we set out below some strategic considerations with regard to biodiversity. In particular we wish to highlight the Sustainability Appraisal Key Objective for Biodiversity to '*Increase habitat connectivity and support improvements in biodiversity*' which we consider to be compromised by some of the proposals.

A critical body of evidence, which we believe must be borne in mind at the earliest stage of identifying large sites for development, is the Local Ecological Network map published by Hampshire Biodiversity Information Centre and available to EHDC. This is accompanied by a policy document produced in 2018 by the Local Nature Partnership and supported by the Hampshire & Isle of Wight Planning Officers' Group. The Wildlife Trust considers that these resources should be used at the earliest stage to determine whether large sites conflict or indeed may enhance this network of habitats required to not only prevent ongoing declines of wildlife, but to allow recovery.

With this in mind we wish to highlight those Large Development Site locations where we believe there could be conflict in this regard:

Chawton Park – the proposed development site sits entirely within a strategic Biodiversity Opportunity Area and could sever existing ecological links between Chawton Park Wood and Bushy Leaze Wood Sites of Importance for Nature Conservation (SINCs). Furthermore the location was previously identified as a priority area of strategic importance in EHDC's Biodiversity Action Plan to '*Create/restore habitat to link and increase size of Chawton Park Wood and Bushy Leaze Wood*'. Even with the design of substantial ecological networks within a development in this location, without very careful management, the resulting recreational impacts on the adjacent woodland SINCs would make this a damaging and unacceptable site for development.

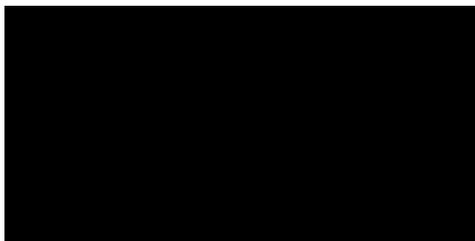
Whitehill & Bordon – the Wildlife Trust has a long history of engagement regarding development in this location as well as managing large areas of nearby Special Protection Area (SPA). We are concerned that, given the proximity to the SPA and Biodiversity Opportunity Area, as well as potential for direct loss of habitats depicted as Ecological Network Opportunity, the increased density of housing in this area puts further pressure on the highly designated landscape and wider ecological network even if there were to be a strategic approach to mitigation and Biodiversity Net Gain.

West of Lymington Bottom Road / South Medstead / Land South of Winchester Road – we note that these areas are in close proximity to the headwaters of the River Itchen Special Area of Conservation, a focus for an ambitious and important project, Watercress & Winterbournes, which is hosted by the Wildlife Trust on behalf of a broad partnership. The headwaters of this internationally significant river system are exceptionally sensitive and due to the sloping nature of the ground at some of these sites, as well as their proximity to pumping infrastructure, the impacts of any pollution during and after construction could be very high, not least on the last Hampshire population of White-Clawed Crayfish. We note the inclusion of Sustainable Urban Drainage Systems which are only likely to mitigate some potential impacts from development in this location and must be suitably designed and maintained in perpetuity to ensure effectiveness.

Horndean – This area was previously identified in East Hampshire Biodiversity Action Plan as part of the Forest of Bere mosaic of Habitats. The land in question is part of the core network in the Local Ecological Network and any development here should not only protect but enhance the ecological connectivity provided by this habitat, especially for bats for which this area is important.

To conclude, the Wildlife Trust is concerned that the large sites coming forward as part of this consultation do impinge on both designated sites and the Local Ecological Network and should be revisited in the light of the evidence available.

Yours faithfully,



Senior Policy & Evidence Advisor

Main Switchboard: 01489 774400
Email: feedback@hiwwt.org.uk

Large Development Sites

(REGULATION 18)



CONSULTATION QUESTIONNAIRE

3 September – 15 October 2019



East Hampshire Local Plan Large Development Sites

This questionnaire has been prepared to assist you in responding to the consultation and should be used alongside the Large Development Sites consultation document and the Why, when and how to get involved guide.

Please note that the Council is unable to accept anonymous comments and for a comment to be formally accepted, a name and contact address (preferably e-mail) must be provided. Comments to this consultation are part of the evidence base which supports the emerging Local Plan. As such, all comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website. Your comments will be made publicly viewable at the appropriate time.

If you wish to be kept updated about this consultation and other Local Plan matters, please register for email alerts via our website.

Name

Organisation (if applicable)

Email (preferred method of contact)

Address Line 1

Post Town

Post Code



To be completed by agents acting on behalf of a client

Client Name

Client Organisation

Client Email

Client Address Line 1

Client Post Town

Client Post Code



How to respond using this form

Please refer to the *Why, when and how to get involved* guide available on our [website](#).

When responding, please include the name of the site your comments refer to. If commenting on more than one site, please make it clear which comment relates to which site.

There are a series of consultation questions. These are:

- 1: Do you have any comments on the proposed uses?
- 2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.
- 3: Do you know of any other constraints to developing the site? Please provide detail and evidence.
- 4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.
- 5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036.

- 6: Is there any reason that this is not achievable?
- 7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?
- 8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper?
- 9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?
- 10: Is there any feedback you would like to give us about this consultation?



Large Development Sites

When responding to a consultation question please quote the question number from the list provided and where applicable, the site name.

Please provide your comments in the box below. Use additional sheets as required.

POLICY HNL:

I am concerned that the planned scale of housing will endanger Climate change problems.

We must ensure that we protect existing trees and then plant more trees and we must protect existing greenfield environments

I should like to see "green" barriers/spaces between the new build and existing buildings

The Broadwalk and Sockfield row are butterfly and Dragonfly habitats - these it is important for future Biodiversity that we maintain the "green" environments.

Pro



Medical facilities.

I believe that the Hazleton site will require its own Doctor/Dentist / Well being / Medical centre. I believe that the Horndean Surgery (Brewery site) will not be able to cope with the increase of people -

furthermore alongs this line, I consider that a dedicated " Medical Centre" with Doctor Triage minor injury is required for the Catherington - Horndean + Hazleton site and Clamfield is needed. (Consider the travel for and ad treatment how either QA or Peterfield (2 miles each way on an 8 or 37/38 bus service")

SUBMISSION

Please submit your comments to reach us by midnight on 15 October 2019 either by:

- E-mail to localplan@easthants.gov.uk
- By post to Planning Policy, East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

Thank you for taking the time to have your say.



Horndean Parish Council
Tyfield House
Blendworth Lane
Horndean
Hants
PO8 0AA
contact@horndeanpc-hants.gov.uk



Horndean Parish Council - Response to Large Development Sites Consultation.

1: Do you have any comments on the proposed uses?

Land East of Horndean – Hazleton Farm

Horndean Parish Council objects to the proposed allocation. LEOH is a huge development that will be providing circa 850 houses with the associated infrastructure. The existing outline application in the main had public support and followed extensive consultation by the then agent acting on behalf of the applicants. The decision to concentrate so much housing in one area was made so that the infrastructure designed to mitigate the negative impact of the development could be provided on site. Importantly, the character of the area was to be retained eg the hedging along the Havant Rd. This included the development being sympathetic to the SDNP being on the southern and eastern boundaries. There is an application for up to 850 dwellings on the same site currently in progress.

The proposed allocation is unacceptable. It is important that any development will give a sense of place where community spirit and enterprise are strong, that it has the right mix of housing, appropriate infrastructure and recreational and leisure opportunities. It would need to form part of Horndean and not have a separate identity effectively giving rise to urban sprawl.

In approving LEOH, Horndean has met its obligations with regard to providing the housing need allocated to it. LEOH now offers a significant increase in the number of dwellings so Horndean is providing some of the extra houses EHDC is required to provide using the amended method of calculation. The appropriate infrastructure has been determined and it should be possible to integrate the development so that the residents do feel part of Horndean and participate in Horndean life accordingly.

An additional 1000 houses is simply too much and would have a significant adverse impact on the area and in particular, Horndean. East Hampshire will see a huge increase in its housing stock and this should be distributed throughout the District. There is no need for this site in this location.

An added complication is that whilst the site is in Horndean, it forms part of Rowlands Castle Parish despite being totally separated from Rowlands Castle by Havant Thicket and intervening countryside. Horndean and Rowlands Castle have very separate and distinct identities and the provision of so much housing in one area would effectively lead to a new settlement with no sense of place whilst having significant adverse impacts on both Horndean and Rowlands Castle.

The location of the gypsy and traveller pitches do not comply with acknowledged requirements by those communities.

2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Land East of Horndean – Hazleton Farm

The infrastructure that would be needed to mitigate the impacts of such a proposal simply cannot be provided.

Firstly, we have referred to the fact that it would not be possible to integrate the development into Horndean so this would form a settlement with no sense of place or community. Infrastructure for such a large development does have to be provided on site to mitigate its impact or you end up with streets of housing and no sense of place- the worst example of development which the NPPF provides should be sustainable.

Secondly, the highway network would be unable to cope with so much additional housing and commercial use. Rowlands Castle is limited as to its highway capacity and the double roundabout is inadequate. The Havant Rd along its entire length from Horndean to Rowlands Castle is inadequate particularly if it is to retain any sense of being a rural road and if severe impact on the SDNP is to be avoided.

Development here would render infrastructure provision at LEOH obsolete and inadequate. Schooling is the first point. The new school would be too small and the secondary provision in Horndean itself would be inadequate. The second point would be a significant adverse impact on the Doctor's surgery. It is debatable if the existing surgery is adequate for the LEOH development. Let alone an additional 1000 dwellings. The net result would be both developments having a significant adverse impact on Horndean and the Southern Parishes. It should be noted that there is no firm commitment on LEOH with known final detail of what will be on site so the risk lies that this will just be a soulless area of urban sprawl.

Transport is a serious consideration. It is a fact that to live in Horndean, you need to have a car. There is a limited bus service along a restricted route that will not be extended to LEOH. It is disingenuous and misleading to show any sort of bus route on the indicative plan as this will simply not happen. There is nothing in the presentation to suggest a robust or workable public transport system which would require finance and commitment from the developer. Service 28 is a term time bus service used by students at HTC, Oaklands School and Havant College. The bus company itself has confirmed that it is not used as a public service. A new service would have to be created by another operator with proper funding being provided to ensure its viability. Our experience of "diverting" a "through route" around an estate is dismal- it doesn't happen.

The presentation mentions "jobs/work" but where are these jobs? They would appear to be away from the development thereby setting up the need for commuter travel. Although there is a commercial element to the proposal, there is no suggestion that this would be built first to provide onsite work for the housing and is very small in relation to the number of houses- less than for LEOH which also provides jobs at the community centre and care village.

The indicative plan shows a self contained site with a small local centre, parkland and some employment land but nothing else by way of mitigation or that would even contribute to a sense of place. It would not complement or enhance the existing town of Horndean nor LEOH once built. There would be two separate communities.

3: Do you know of any other constraints to developing the site? Please provide detail and evidence.

Land East of Horndean – Hazleton Farm

The site is outside the SPB and opposite the South Downs National Park. Obvious constraints arising from the proximity of the SDNP are the safeguarding of views, relative tranquility, dark night skies, biodiversity and geodiversity and transport and accessibility. This site would result in a huge urban population adjacent to a National Park that has the highest level of protection.

There could be a serious detrimental impact on groundwater and the potential for contamination of the aquifer thus affecting both the natural environment and human health. Mitigation would always be insufficient.

It is believed that such a density of housing would seriously impact on biodiversity with Bechstein bats being an obvious concern.

The site forms part of the natural break between Horndean and Rowlands Castle. We have mentioned the very different cultures of the two settlements. Both areas have their own identity and sense of place and development of this site would increase the problem of the loss of the same.

4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.

Land East of Horndean – Hazleton Farm

None. Horndean has met its housing allocation for the plan period to 2036. (Extra dwellings at LEOH and windfall numbers are robust and being delivered.) East Hampshire District Council has given careful consideration to the distribution of housing growth throughout the District giving the best benefit to all areas. This development would have a significant detrimental impact on the Southern Parishes.

5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

Land East of Horndean – Hazleton Farm

The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036.

The significant adverse impact on Horndean and Rowlands Castle as well as the South Downs National Park have been highlighted in preceding questions.

6: Is there any reason that this is not achievable?

Land East of Horndean – Hazleton Farm

A sustainable development with a sense of place and community spirit as part of Horndean is not achievable for reasons set out in preceding questions.

7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?

Land East of Horndean – Hazleton Farm

We believe that each area should speak for itself as they are the only ones to speak with any knowledge or accuracy on the benefits or otherwise of development. There is no such site in Horndean.

8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper?

Land East of Horndean – Hazleton Farm

The background paper is comprehensive and provides a fair balance of all the considerations involved in identifying development sites.

9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?

Land East of Horndean – Hazleton Farm

No. Papers that have been produced are comprehensive and balanced. Horndean Parish Council commented separately on the draft Local Plan and we would not repeat those comments here so as not to detract from the serious negative impact issues presented by this suggested development site.

10: Is there any feedback you would like to give us about this consultation?

None at present.

08 October 2019.

Representation received. ID:26461

East Hampshire District Council <easthants@jdi-consult.net>

Fri 04/10/2019 13:02

To: parish_clerk_at_kingsleyparishcouncil.org [REDACTED]

Kingsley Parish Council,

Your representation has been received.

ID: 26461

Type: Comment

Document: Large Development Sites

Section: WB1: Do you have any comments on the proposed uses?

Summary:

Full Text:

Kingsley Parish Council would like there to be consideration of traffic routes through Kingsley when any development is considered, particularly any further development in Whitehill & Bordon.

Land South East of Liphook

[Redacted]

Sun 13/10/2019 21:09

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (175 KB)

LHA reponse to EHDC consultation 13Oct19.pdf;

Dear Sir / Madam

Please find attached a consultation response to the proposal for Land South East of Liphook from the **Lynchmere Hamlet Association**.

Regards

[Redacted]

[Redacted]



LYNCHMERE HAMLET ASSOCIATION

EHDC Large Development Sites (Regulation 18) Consultation Response

Proposal to develop land south east of Liphook to deliver 600 new homes

13 October 2019

Introduction

This response is from the Committee members of the Lynchmere Hamlet Association who represent the residents of Lynchmere village, consisting of about 50 houses. The centre of the village is less than one mile from the proposed development and is directly affected, although in West Sussex and not Hampshire. Lynchmere village lies within the parish of Lynchmere and the Parish Council is making its own, independent representation. The Committee members have all seen this letter.

The proposed site goes right up to the Hampshire – West Sussex border and the boundary of the South Downs National Park (SDNP). There was no consultation with Lynchmere Parish Council at Stage 1 of the process. There is a duty under the NPPF to have cross-border co-operation and the Lynchmere PC's comments should have been considered before deciding whether this was a suitable site for 600 houses that could proceed to Stage 2.

Across Highfield Lane is Highfield School which agreed a Whole Estate Plan (WEP) with the SDNP in March 2018. Lynchmere falls within the SDNP, and the impact on Lynchmere of more modest development proposals at Highfield School was a key consideration of the WEP. The proposed development south east of Liphook makes no mention of the WEP, even though one member of the consortium of landowners of this site is the owner of Highfield School and has made commitments to the SDNP.

The proposed development is on a significantly larger scale and the impact on the SDNP and the environment of Lynchmere will be substantial and detrimental.

Objection

The residents of Lynchmere object to this proposed development on the following grounds:

Destruction of the rural environment bordering the SDNP and the impact on rare habitat

- The site is located between the existing settlement policy boundary for Liphook and the SDNP boundary, with much of the proposed development bordering the SDNP and some of it within the SDNP. This would result in a loss of the strategic and green gap between the built-up environment and the SDNP, including the village of Lynchmere, suburbanising the landscape immediately adjacent to the SDNP.
- The proposed site is close to both Stanley Common and Lynchmere Common, both lowland heath habitats that are host to rare bird and reptile species. The proposed development will result in significant light pollution that will impact these species as well as the rural community of Lynchmere. Light pollution was a key constraint in the Highfield WEP but has not been addressed by this proposal.
- The claimed mitigation by the provision of a Suitable Natural Green Space (SANG) is no mitigation at all. It is already unfenced land crossed with public and permissive footpaths, mostly already within the SDNP and is more than a mile from the development site accessible only down the busy Highfield Lane which has no pavement and therefore completely unsuitable for pedestrians.
- 600 new homes in such a sensitive location is serious over-development, and is complete urbanisation of a rural location.

A comprehensive environmental impact assessment is required.

Lynchmere Parish Council Response To East Hants Consultation On Site Allocation For Land To The South East Of Liphook / Large development site consultation 03.09.19-15.10.19

[Redacted]

Thu 10/10/2019 09:32

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (158 KB)

Lynchmere Parish Council Response To East Hants Consultation On Site Allocation For Land To The South East Of Liphook.docx;

Dear Sir/Madam

Please see attached the Lynchmere Parish Council Response To the East Hants Large development site consultation 03.09.19-15.10.19: Consultation On Site Allocation For Land To The South East Of Liphook I would be grateful for confirmation of receipt.

Kind regards

[Redacted]

[Redacted]

Clerk & RFO to Lynchmere Parish Council

[Redacted]

[Redacted]

[Redacted]

[Redacted]

www.lynchmere-pc.gov.uk



09.10.19

Lynchmere Parish Council Response To East Hants Consultation On Site Allocation For Land To The South East Of Liphook

Sent by email to: localplan@easthants.gov.uk

Dear Sir/Madam

Lynchmere Parish Council were aware of a possible planning application for housing on land south east of Liphook but have significant concerns about the suitability of this site being allocated for such a large development of 600 houses. These include the scale and mass of the proposals, Highways and access issues as well as environmental damage. We feel the Application is contrary to the vision in the Highfield Whole Estate Plan (WEP) endorsed by the SDNP in March 2018. This Plan was supported by Lynchmere Parish Council. We understand the WEP is now a material consideration in any future planning applications. It agrees to conserve all facets of the landscape and to enhance the wildlife and cultural heritage of the area which includes a large part of the arable land located on the proposed major development site. While the actual site is just inside the East Hants boundary the surrounding narrow roads and access points are in the SDNP area of West Sussex in Lynchmere Parish. As we are so closely involved we are disappointed that East Hants has had no Consultation with us during Stage 1 of this Consultation which could have taken our local knowledge into account. We feel this goes against the duty to co-operate cross boundary as stated in the NPPF.

Lynchmere Parish Council objects to these proposals on the grounds of

1. OVER -DEVELOPMENT

600 houses on this site would be over development of these fields on the South East side of Liphook. It would result in the loss of the strategic and green gap between the built-up area and the more rural environment of Lynchmere which would suburbanise the landscape and blur their distinctive characteristics detracting from the existing panoramic views.

2. HIGHWAYS ISSUES

There are already considerable traffic problems along both the B2131 and Highfield Lane where there are 3 private schools. These roads are especially busy at school and commuter travelling times. The junction between Highfield Lane and the historic sunken Devil's Lane is particularly dangerous with no clear sightlines. We have considerable safety concerns about the advisability of extra traffic along these routes and of vehicles turning in and out of the proposed access points along them. The Whole Estate Plan states that it would resist plans for road improvements which would alter the experience of travelling through the existing landscape and the need to conserve the ancient sunken lanes. It also disapproves of any housing development that would create more dense settlement along the roadside.

3. ENVIRONMENTAL ISSUES

The importance of the dispersed settlement pattern in maintaining the rural and tranquil character of the Highfield Estate area is also recognised in the WEP. It stresses the environmental benefits of maintaining a low density of settlement with associated dark skies and low noise levels which is particularly valuable to maintain when in close proximity to areas of more dense settlement. The Estate has been part of both the Lynchmere and Liphook communities for over 100 years and gradual development and improvements mainly to the Highfield School area have been generally accepted while keeping it relatively tranquil and respecting the surrounding countryside. However Lynchmere Parish Council does not feel these proposals would maintain this and, while there are welcome plans for recreational green spaces, safer pedestrian and cycling routes avoiding local roads, nature conservation and food growing, it has not seen sufficient evidence of how the developers would mitigate the detrimental environmental effects of building so many houses on this rural landscape. The proposed SANG is not in fact an alternative new green space as indicated but is an existing one. The site is also in very close proximity to Lynchmere Commons and the Nature reserve owned by the Lynchmere Society. Lynchmere Parish Council is very concerned about the adverse impacts on this lowland heath habitat and on its wild life that such a large housing development could bring and would request that an environmental impact assessment is done to include this area if the proposals continue to be put forward.

4. LACK OF INFRASTRUCTURE

There is a lack of detail about what extra infrastructure would be provided to cope with a housing development of this size. There is reference to the possible provision of extra schooling without identifying what this will be. There is no mention of extra GP provision or how the water supply and sewerage could manage. LPC understands the sewerage system is already under strain from other housing developments in Liphook. Part of the proposed site near the B2131 is also subject to regular groundwater flooding which can extend across the road.

5. CONSTRAINTS

At the Consultation event in Bordon LPC was informed that all the land was registered and that it was not believed to be subject to any Covenants. However, we have since found reference to Covenants in the Highfield WEP (page 16). LPC requests that East Hants checks these Covenants and clarifies whether they show anything that could constrain or prevent a housing development going ahead on this part of the proposed site.

Lynchmere Parish Council recognises the need for increased housing provision and could be more supportive of a much lower density scheme. However, for the reasons outlined above, we feel that the damage of building 600 houses in this particular location outweighs the benefits and that it would not be in accordance with the values put forward in the WEP. We therefore object to it being included in the East Hants Large Site Development Plan.

Yours sincerely



(Clerk to Lynchmere Parish Council)

The Lynchmere Society's Response to East Hants Consultation On Site Allocation For Land To The South East Of Liphook

[REDACTED]

Tue 15/10/2019 19:10

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (262 KB)

LETTER TO EAST HANTS COUNCIL.doc;

Attached is a Response from the Lynchmere Society to the above.

--

[REDACTED]



The Lynchmere Society

Registered Charity No. 1010371

[REDACTED]
[REDACTED]
[REDACTED]

Tel: [REDACTED]

THE LYNCHMERE SOCIETY RESPONSE TO EAST HANTS CONSULTATION ON SITE ALLOCATION FOR LAND TO THE SOUTH EAST OF LIPHOOK

Sent by e-mail to: localplan@easthants.gov.uk

15 October 2019

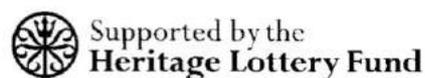
Dear Sir/Madam,

The Trustees of The Lynchmere Society are very concerned about the possibility of this site being allocated for such a large development. This Society was formed in 1991. A Volunteer-run registered Charity, the interests include Planning and Architecture, Education, and protection and improvement of features of historic, environmental and historic interest. When the Commons came up for sale in 1996 we embarked on a huge fundraising effort, generously supported by local residents not only from Lynchmere, but from Liphook, Fernhurst and Haslemere etc. With the help of the National Lottery we became owner of some 307 acres of lowland heath. Lynchmere and Stanley Commons were registered as a **Local Nature Reserve** and we began the restoration of this endangered landscape. We have around 375 addresses (around 50 in Liphook alone) on our Membership list, giving us well over 400 Members. We are in the South Downs National Park's Heathland Reunited Partnership. The Serpent Trail runs the whole length of our Commons.

We object to this proposal because of :

(1) Environmental issues *(our ecological adviser writes)*

The density of 600 houses in this vicinity would have a huge impact on the local lowland heath which is now one of the rarest habitats in the world, let alone in England. This Reserve is a vital heathland corridor that links Marley Common to Chapel Common following the Greensand Ridge. There are a number of rare species found here including ground-nesting birds such as nightjar and woodlark that would suffer from cat predation and disturbance from the increase of dog-walking. Within the woodland area there are dormice which would also be at risk. The railway line acts as a buffer against cat predation at present. Large growth in the population on this side of Liphook would increase the likelihood of more litter being dumped in the landscape, contaminating the countryside, and raising the chances of fires and alien species that destroy our local flora.



The logo of Bell Heather (Erica cinerea) indicates the Society's ownership of the Lynchmere Commons



The Lynchmere Society

Registered Charity No. 1010371

The idea of improving access and SANG creation beside the Reserve is not what is needed here. There is already adequate access using the existing paths and any change in path surfacing would affect the resident invertebrate populations.

This site is adjacent to the International Dark Sky Reserve (IDSR) in the South Downs National Park (May 2016) It is the 2nd IDSR in England and one of only 13 in the world. Dark night skies help nocturnal wildlife, and the light pollution from this development would cause serious disturbance to bats' foraging corridors. All three varieties of bat have been seen on our Commons.

A definite need for an Impact Assessment is indeed necessary before any such scheme is considered.

(2) Roads

Traffic to the south and east of Liphook is a problem at present, particularly at the morning rush hour and beginning and end of the school day. That Liphook falls within Hampshire but many residents rely on Haslemere in Surrey for express trains, library, variety of shops, etc. can only mean a large increase in traffic on the B2131 corridor - in West Sussex - which is heavily-used and often dangerously!

(3) Lynchmere Parish Council's Response

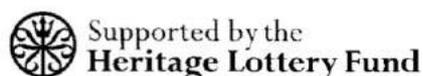
The Lynchmere Society agrees with all the points mentioned in Nos 4 and 5 of their Response.

Climate change requirements must surely be to reduce the trend of changing natural and/or agricultural land into areas of housing.

Yours faithfully,

██████████ (Chairman)

on behalf of the Trustees of The Lynchmere Society





The Lynchmere Society

Registered Charity No. 1010371

Supported by
rural action
FOR THE ENVIRONMENT



 Supported by the
Heritage Lottery Fund

The logo of Bell Heather (Erica cinerea) indicates the Society's ownership of the Lynchmere Commons

EHDC Large Development Site Consultation - Objection

[REDACTED]
Mon 14/10/2019 11:21

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>; "victoria.potts\"@easthants.gov.uk <"victoria.potts\"@easthants.gov.uk>

Cc: [REDACTED]

 2 attachments (3 MB)

M&FMNP Support documentation.pdf; M&FMNP Submission to EHDC Large Development Site Consultation.pdf;

Dear Sirs,

Please find the attached submission to the EHDC Large Development Site Consultation from the Medstead & Four Marks Neighbourhood Plan Steering Group.

The Steering Group objects to the sites:

- **Four Marks South**
- **Land West of Lymington Bottom Road**
- **Land South of Winchester Road**
- **South Medstead**

Our reasons are contained in our Submission document and amplified in the supporting documentation.

Regards,

[REDACTED]

[REDACTED]

Secretary,

Medstead and Four Marks Neighbourhood Plan



**MEDSTEAD AND FOUR MARKS
NEIGHBOURHOOD PLAN**



**Core Documents
To Support Representations from the Steering Group
Medstead and Four Marks Neighbourhood Plan**

October 2019



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Core Documents to Support Representations from the Steering Group

Medstead and Four Marks Neighbourhood Plan

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Core Document 1

Submission from the NPSG to the appeal in the case of Land at Friars Oak Farm, Boyneswood Road, Medstead, Alton. (East Hampshire District Council Reference Number: 25256/045)

The Planning Inspectorate,
Room 3D,
Temple Quay House,
2 The Square,
Temple Quay,
Bristol, BS1 6PN

9 May, 2019

Dear Madam,

Town and Country Planning Act 1990.

Planning Inspectorate Reference: APP/M1710/ W/19/3225766

Appeal by: William Lacey Group

Location: Land at Friars Oak Farm, Boyneswood Road, Medstead, Alton

East Hampshire District Council Reference Number: 25256/045

On the 12 May 2016 the Medstead and Four Marks Neighbourhood Plan (M&FMNP) was "made" by East Hampshire District Council (EHDC). This Neighbourhood Plan now forms part of the Development Plan and its policies hold full weight for the decision maker.

The Neighbourhood Plan Steering Group (NPSG) who were responsible for the development of the M&FMNP recommend that this appeal be rejected. The reasons for this are as follows:

1. THE DEVELOPMENT WOULD CONFLICT WITH POLICY 1 OF THE 'MADE' NEIGHBOURHOOD PLAN

Policy 1 of the Neighbourhood Plan is shown below:

"Policy 1: A Spatial Plan for the Parishes

The Neighbourhood Plan designates a Medstead Village Settlement Policy Boundary (MVSPB), a South Medstead Settlement Policy Boundary (SMSPB) and a Four Marks Settlement Policy Boundary (FMSPB) as shown on the Policies Maps. Development Proposals on land within the Settlement Policy Boundaries will be supported, subject to accordance with relevant policies.

The inappropriate development of residential gardens, for example, where such development would harm local character, will be refused."

The NPSG understand that EHDC can demonstrate a robust 5 year land supply and therefore the Local Plan is not out of date. The Neighbourhood Plan therefore remains an integral part of the Statutory Development Plan.

2. THE M&FMNP MEETS THE CRITERIA LAID OUT IN THE NPPF PARA 11D

The appellant claims that the NP did not allocate sites. This is not the case. The NP did allocate sites by explicitly recognising the sites that were included in the EHDC Housing and Employment Allocations: April 2015. This is clearly stated in para 1.31 of the NP.

To confirm that there was no confusion over this point, the Inspector in his report at the Examination stated that:

*"I am especially mindful that East Hampshire District Council does not dissent from the Neighbourhood Plan being in general conformity with adopted strategic policies. Given the above, there is no need for the Neighbourhood Plan to go on allocating additional land over and above that required. There is no need for the NP to allocate **new** housing sites."*

3. THE CURRENT LEVEL OF DEVELOPMENT IN THE SETTLEMENT CANNOT BE CONSIDERED TO BE 'SUSTAINABLE DEVELOPMENT' AS IT DOES NOT MEET THE CRITERIA LAID OUT IN THE NPPF.

The level of new housing within the settlement that has been delivered and approved over the 5 years to 31st March 2018 is substantially greater than that planned in the JCS adopted by EHDC in June 2014.

Scale: it exceeds the absolute number by 3 times (626* vs. 175)

Speed: It exceeds the Plan's annual rate by 10 times (125 dpa vs. 11dpa)

The NPSG are of the view that the extent to which the actual delivery of new housing has exceeded the Plan means that the development in this settlement is not currently sustainable as it does not meet the criteria for 'sustainability' as laid out in the NPPF.

The three criteria for 'sustainable development' in the NPPF are covered below:

a) An Economic Objective

The NPPF expects development 'to build a strong, responsive and competitive economy'

The building of 58 new houses is unlikely to contribute to this objective. This statement is based on the fact that the application contains no proposals for new employment sites. This is consistent with the situation that the settlement has already experienced with the 626* new dwellings already approved. In this settlement no new sites have been made available for employment (employing > 5 people). Indeed, the evidence shows that there have been three sites that have had the designation changed from industrial/employment to residential.

We accept that there is a short term economic benefit from the building of new houses. However, in a recent planning application the applicant stated that there would be a workforce of 71 people working on their site. This would bring

* Letter sent prior to publication of EHDC 5 Year Land Supply Data 2018

additional custom to the shops. But, the application also noted that less than 10% would be local residents. This is a good example of the fact that any benefit that does accrue to the local settlement is small scale and temporary.

The NPPF directs that 'sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.'

This appeal is for a development that is neither the right type of development nor in the right place.

The right type of housing would be market housing at a price that reflects the financial constraints of local people on a median salary. In this area the median house price is a very large multiple of the median salary. With a median salary of around £30,000 a house costing more than £200,000 looks unattainable to those trying to get onto the housing ladder. It is unlikely that his application will contain any houses at this price level.

The right place for housing would be close to

- i) sources employment
- ii) public transport.

In this settlement, despite the increase in houses of 626*, there has been no increase in the provision of local employment opportunities.

Similarly, there has been no increase in the provision of public transport to enable those living in these houses to be able to commute to work by public transport.

- There is no public train service from Medstead. (There is a train station but this is only for the Mid Hants Railway tourist line)
- There is no direct bus service to any of the following local employment locations: Farnham, Basingstoke, Liphook, or Petersfield.
- There is a direct bus service to Winchester, Alresford and Alton. However, this is not a popular service with commuters as it is inconvenient and insufficiently reliable.

This specific development is also clearly not in the right place because of its location on the 'wrong' side of the railway line. This will create unnecessary traffic bottlenecks at the single lane over the narrow bridge crossing the Mid Hants Railway.

b) A Social Objective

The NPPF states that sustainable development should 'support strong, vibrant and healthy communities'.

Recent development in this area has failed to meet this objective. The key reason is that the newcomers do not have jobs within the local community. They commute to other locations for their employment. This means that the demands of their working week make it difficult for them to contribute to and become engaged in the local community.

* Letter sent prior to publication of EHDC 5 Year Land Supply Data 2018

This proposal would only lead to more of the same.

The NPPF states that sustainable development should provide ‘a sufficient range of homes to meet the needs of present and future generations’.

The main concern for present and future generations is about getting onto the housing ladder. What the present, and future, generations are looking for is market housing at a price that reflects the financial constraints of local people on a median salary – as discussed above.

There is no evidence that the ‘affordable housing’ contained in this proposal will meet this objective.

The NPPF states that ‘sustainable development’ should ‘reflect current and future needs and support communities ‘health, social and cultural well-being.

As noted above, there are not sufficient jobs available in the locality for all those living in the new houses. Those of working age often commute long distances to work. This means that the demands of their working week make it difficult for them to contribute to and become engaged in the social and cultural well-being of the local community.

Furthermore, despite the rapid increase in the number of houses, there has been no increase in infrastructure to support the health, social or cultural well-being of the increased population.

c) An Environmental Objective

The NPPF states that new developments should ‘contribute to protecting and enhancing our natural, built ... environment’.

This development is planned for a greenfield site. Steps are proposed to mitigate the adverse environmental impact of building on this greenfield site, but none of the actions taken could be said to be improving biodiversity nor of contributing positively to the environment. Further, it is noted in the Appellant’s Planning statement he offers contaminated land to Medstead Parish Council as a site for a community building.

The NPPF states that new developments should be ‘minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy’

These 58 new homes would be built in a location that has poor public transport facilities, and, as noted above, are likely to be occupied by those who commute to work using a car.

In addition, it is highly likely that any children of school age will have to travel to Alton or Chawton. For secondary school children, there are no schools in Medstead or Four Marks. For primary school children who move to the proposed development, there would be no opportunity to attend the Medstead School as it is already full. It is also unlikely that they would be able to attend the Four Marks school as that is in the process of being filled by the children moving into the 626¹ new homes that are in the process of being built. All the children of school age who moved into this new development would have to travel by car or bus to school. This proposal is clearly not meeting the objective of moving to a low carbon economy

4. THERE IS SUPPORT FROM THE PLANNING INSPECTORATE FOR OUR VIEW THAT THIS SCALE OF DEVELOPMENT IS NOT SUSTAINABLE

There are a number of examples where Inspectors have clearly indicated that the speed and scale of delivery of new homes in this settlement, when compared with the minimum target contained in the JCS, is excessive and could undermine sustainability.

- ***The examination of the EHDC Local Plan: Housing and Employment Allocations 15 February 2016***

In his Report, the Examiner noted the following¹:

“The overall JCS requirement is significantly exceeded and although additional sites have been put forward in representations there is no need to allocate further sites. Indeed, any significant further increase could begin to conflict with the JCS in terms of the scale and distribution of development between the settlements.”

- ***The Examination of the Medstead and Four Marks Neighbourhood Plan***

In his report, the Examiner noted the following²:

“there is no need for the Neighbourhood Plan to go on allocating additional land over and above that required. The results of consultation establish that the community is concerned that the essentially rural character of Neighbourhood Area, part of “the Hampshire Alps,” risks harm resulting from increased urbanisation. There are concerns that additional housing is not being supported by the provision of additional employment – resulting in unsustainable patterns of movement; and that investment in local infrastructure, including services and facilities, has failed to keep pace with housing growth’

- ***The Appeal in the case of The Haven, Dinas and Merrow Down, Land west of Boyneswood Road, Medstead, Alton, Hampshire GU34 5DY (Appeal Ref: APP/M1710/W/16/3154870. Decision date: 22 December 2016)***

In his report, the Inspector noted the following³:

“the development plan strategy seeks to provide for sustainable development, seeking to ensure that land is brought forward for

¹ EHDC Local Plan: Housing and Employment Allocations, 15 February 2016
https://www.easthants.gov.uk/sites/default/files/documents/EHDHousingAndEmploymentAllocations_0.pdf

² Medstead and Four Marks Neighbourhood Plan Examination, A Report to East Hampshire District Council. Examiner Nigel McGurk - November 2015

<https://www.easthants.gov.uk/sites/default/files/documents/Medstead%20%26%20Four%20Marks%20Neighbourhood%20Plan%20Examiner%27s%20%20Report.pdf>

³ Appeal Ref: APP/M1710/W/16/3154870. Decision date: 22 December 2016 Inspector David Cliff
https://planningpublicaccess.easthants.gov.uk/online-applications/files/52FB1760DFC7C5F2652F15CF6FEA5F8E/pdf/55949_001-APPEAL_DECISION-689681.pdf

development to meet housing need in a sustainable manner so that it is supported by the necessary infrastructure and provides for protection of the countryside. Given that there already permissions in place to take new housing well beyond the identified figure, the resulting implications for local infrastructure weighs against the sustainability credentials of the proposal."

- **The Appeal in the case of Land to the North of The Telephone Exchange, Lymington Bottom Road, Medstead, Hampshire GU34 5EP** (Appeal Ref: APP/M1710/W/15/3134150. Decision date: 09 February 2016)

In his report the Inspector noted the following⁴:

"24. The additional 175 dwellings to be provided across the plan period was the subject of a sustainability appraisal. The fact that this target has been met and substantially exceeded early in the plan period demonstrates the pressure that the settlement is under, and which is likely to continue. The small level of services that are within the village are under significant pressure given the size of the settlement and the pace of increase at this point in time. This adds to the pressure on services and facilities including in terms of public open space, community facilities and education."

- **The Appeal in the case of Land to the rear of 131 Winchester Road Four Marks, Alton, GU34 5HY** (Appeal Ref: APP/M1710/W/17/3168191 Decision date: 27 June 2017)

In his report the Inspector noted the following⁵:

"I am also conscious of the relevant parts of the Framework which set out that planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date and provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. The Council have clearly demonstrated that this approach underpins their plan-making and decision-taking."

⁴ Appeal Ref: APP/M1710/W/15/3134150. Decision date: 09 February 2016 Inspector Kenneth Stone
https://planningpublicaccess.easthants.gov.uk/online-applications/files/D90B9603645A0233D540B22086EDDC3A/pdf/39009_005-APPEAL_DECISION-607497.pdf

⁵ Appeal Ref: APP/M1710/W/17/3168191 Decision date: 27 June 2017 Inspector H Butcher
https://planningpublicaccess.easthants.gov.uk/online-applications/files/4D21D1E53ACE79D08F848E0B9B3ABFB5/pdf/30800_010-APPEAL_DECISION-723057.pdf

5. IF THIS APPEAL WERE ALLOWED, IT WOULD UNDERMINE THE WHOLE PRINCIPLE OF NEIGHBOURHOOD PLANNING

The NPSG would also like to express their disappointment with the contempt that the appellant shows for the whole Neighbourhood Planning process by lodging this appeal.

This Neighbourhood Plan was subjected to the full statutory process laid out in the Localism Act. The process included extensive consultation within the community on the Draft Plan; a formal Submission Plan; an Examination by a Planning Inspector; and a Referendum at which there was a turnout of 41% of whom over 93% voted in favour. The Plan was then 'made' and is now part of the statutory development plan.

Furthermore, this Plan was put together by volunteers within the local community who gave willingly of their time to get to grips with some of the more arcane processes of the planning system and devise a plan that would represent the needs and aspirations of the local community for the next 15 years.

For this Plan to be challenged on such flimsy grounds within 3 years of the Plan being 'made', leads people in the community to ask 'what was the point'. People are concerned that they were asked to exercise their democratic right to vote on the Plan only to find that their wishes are ignored.

Such a cavalier approach appears to undermine all the social objectives that are enshrined in the NPPF and encourages an unnecessary level of anger and conflict within our society.

Additionally, there is no evidence that the appellant engaged in the process of the development of the NP by challenging the Plan as it went through due process of formulation as there is no record that he made any representation to the NPSG or to the Examiner.

Unfortunately for the appellant the vast majority of those who voted in the Referendum, voted in favour of the Plan and they would be extremely distressed if this misguided attempt to overturn their democratic decision was given any credence at all.

Yours faithfully



Chairman of the Neighbourhood Plan Steering Group

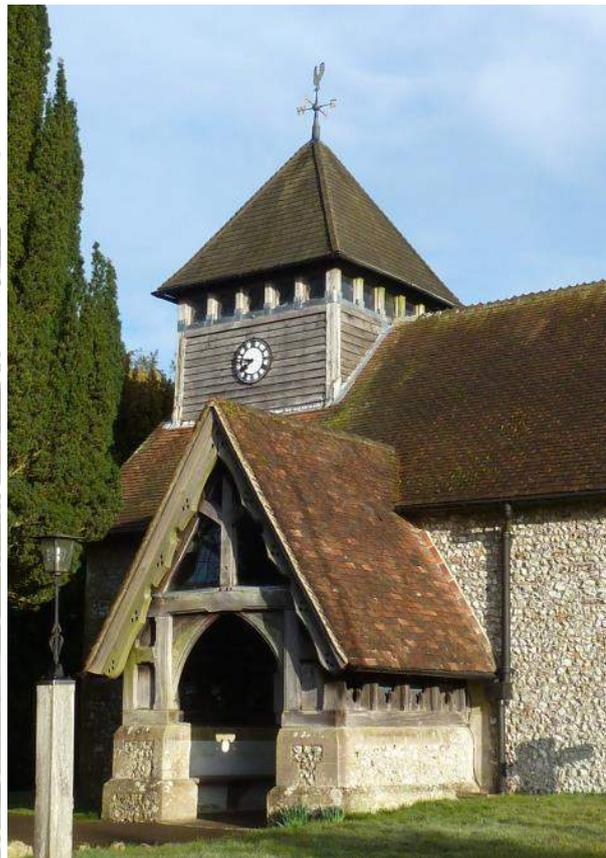
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Core Document 2

MEDSTEAD & FOUR MARKS NEIGHBOURHOOD PLAN REVIEW



Housing Review

August 2019



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Housing Review

1. Summary

- 1.1 The Joint Core Strategy, adopted by EHDC, identified the settlement of Four Marks/ 'South Medstead' as a 'small local service centre'. The JCS recommended that Four Marks/'South Medstead' should provide a minimum of 175 additional dwellings by 2028.
- 1.2 To April 2019, the number of completions for Four Marks / 'South Medstead' was 540. In addition, permission has been granted for a further 86. It is expected that by the end of 2019 the total of completions will be 628, if all built out in the year.
- 1.3 The speed and scale of these unplanned changes has resulted in the local infrastructure failing to keep up with the number of dwellings being built.

2. Housing in Four Marks and Medstead Ward

- 2.1 From the 2011 census figures (Office of National Statistics ⁶), there were 2,249 dwellings: Medstead - 851, Four Marks – 1,562 and The Shrave (Chawton) – 36.
- 2.2 The housing base for the JCS was set at 1st April 2013. From the data, the housing completed to 1st April 2019:

Completions in Financial year	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
2013	4	5	15	0	24
2014	3	2	28	4	37
2015	4	5	74	0	83
2016	7	2	86	20	115
2017	8	126	16	0	150
2018	9	142	9	6	166
Change to date	35	282	228	30	575

- 2.3 This shows that the number of completions in the settlement of Four Marks/'South Medstead' is already 540.

⁶ ONS Housing Data Sets

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/2011censusdetailedcharacteristicsonhousingforlocalauthoritiesinenglandandwales>

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- 2.4 The EHDC 5 Year Land Supply 2018 report, dated 1st April 2019, also includes the data for dwellings that have been granted planning permission but have not been built out.

Outstanding	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
Large	0	54	0	0	54
Small	4	17	14	3	38
Total	4	71	14	3	92

- 2.5 From the above we can see that the current proposed total of dwellings in the area is

Outstanding	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
Change to date	35	282	228	30	575
Awaited	4	71	14	3	92
Currently Expected	39	353	242	33	667

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Appendix 1

1. EHDC Housing Strategy

- 1.1 EHDC housing strategy is based around the current settlements within the area, but is restricted by the South Downs National Park Authority (SDNPA) the local Planning Authority for the National Park.
- 1.2 Sustainable development is a key theme of the EHDC's sustainable community strategy as well as national planning policy guidance. It acknowledges that development needs to be distributed in a sustainable way and an effective tool for measuring this is via a settlement hierarchy.
- 1.3 In Core Policy 2 Spatial Policy, in EHDC Local Plan 1 – Joint Core Strategy⁷, a sustainable hierarchy of settlements is set out based upon the accessibility of settlements, their availability of a broad range of facilities, their economic role, and the environmental constraints to development. Development in all settlements was to be consistent in maintaining and enhancing their character.
 - **Level 1** - Market Towns were the most sustainable locations for most new development in terms of access to local services and facilities. Within environmental constraints, they were to continue to offer the widest range of shopping and be main destinations for social, leisure, entertainment, cultural, commercial and economic activity, serving wide catchment areas. Small, independent traders would continue to thrive, contributing to a strong sense of place.
 - **Level 2** - Large Local Service Centres provided a range of services and are suitable locations to accommodate new development. Their role was to be maintained to ensure they continue to serve a wider, rural hinterland with vibrant centres and a range of local services. They would complement the market towns by providing for main convenience food shopping and a reasonable range of other shops and other services.
 - **Level 3** - Small Local Service Centres had a more limited range of services but were suitable locations to accommodate some new development. These centres would have different roles depending on their size, but they all play an important part in the life of their communities. They will be maintained to ensure that they provide basic food and grocery shopping, supported by a limited choice and range of other shops plus a range of non-retail services and community uses. Modest development to meet local needs for housing, employment, community services and infrastructure would secure their continuing vitality and ensure thriving communities.
 - **Level 4** - Other settlements with a settlement policy boundary have a limited

⁷ EHDC Local Plan 1 Joint Core Strategy CP2 p24

<http://www.easthants.gov.uk/sites/default/files/documents/DP01EastHampshireDistrictLocalPlanJointCoreStrategy.pdf>

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range of local services and might be appropriate for some further small scale local development.

- **Level 5** - Rural villages considered as being in the countryside with limited access to facilities and workplaces and new development limited to that which is appropriate to rural

1.4 The majority of development was to be focused in or adjoining the most sustainable towns and larger villages where it was to be consistent with maintaining and enhancing their character. Policy boundaries for each settlement were to be defined through the Local Plan: Allocations and the South Downs National Park Local Plan taking into account sites allocated to meet the community's development needs. The proposed hierarchy is:

South Downs National Park	Position in Hierarchy
Petersfield	Market Town
Liss	Small Local Service Centre
Bucks Horn Oak, Buriton, Chawton, East Meon, East Worldham, Greatham, High Cross, Hill Brow, Liss Forest, Lower Farringdon, Selborne, Sheet, Steep, Stroud, Upper Farringdon, West Liss Blackmoor, Binsted, Blendworth,	Other settlements with a settlement policy boundary
All other settlements	Small rural villages/hamlets within the countryside

North of South Downs National Park and Whitehill & Bordon	Position in Hierarchy
Alton, Whitehill & Bordon	Market Town,
Liphook	Large Local Service Centre

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Four Marks/'South Medstead', Grayshott Small Local Service Centres Alresford, Beech, Bentley, Bentley Station, Bentworth, Bramshott,	Other settlements with a settlement policy boundary
Griggs Green, Headley, Headley Down, Holt Pound, Holybourne, Kingsley, Lindford, Medstead village, Passfield Common, Ropley, Ropley Dean, Upper Froyle	All other settlements - Small rural villages/hamlets within the countryside
All other settlements	Small rural villages/hamlets within the countryside

Southern Parishes	Position in Hierarchy
Horndean,	Large Local Service Centre
Clanfield, Rowlands Castle	Small Local Service Centre
Catherington, Lovedean	Other settlements with a settlement policy boundary
All other settlements	Small rural villages/hamlets within the countryside

1.5 Development in Four Marks/'South Medstead' (small local service centre) was to be primarily that to achieve sustainable communities. The quantity and type was to reflect its role, distinct character and development constraints. Four Marks lies close to the boundary of the National Park.

1.6 In CP10, EHDC LP1 – Joint Core Strategy 2014⁸ determined the proposed housing required in the District between 2013 and 2028 as a minimum of 10,060'

Provision is made for a minimum increase of 10,060 dwellings in the period 2011 to 2028 by means of:

⁸ EHDC Local Plan 1 Joint Core Strategy CP10 p41
<http://www.easthants.gov.uk/sites/default/files/documents/DP01EastHampshireDistrictLocalPlanJointCoreStrategy.pdf>

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- completion of existing permissions and allocations,
- development within the defined settlement policy boundaries of towns and villages where it is consistent with maintaining and enhancing their character and quality of life,
- the Strategic Allocation at Whitehill & Bordon of 2,725 new dwellings over the Plan period and the remainder of the 4,000 in total beyond the Plan period (see Policy CSWB4), and
- the allocation of sites at the most sustainable settlements to provide:
 - a minimum of 700 dwellings at Alton and Horndean and Petersfield;
 - a minimum of 200 dwellings at Clanfield;
 - a minimum of 175 dwellings at both Liphook and Four Marks/'South Medstead';
 - a minimum of 150 dwellings at both Liss and Rowlands Castle;
 - a minimum of 150 dwellings at other villages outside the National Park;
 - a minimum of 100 dwellings at other villages in the National Park.

Sites will be identified through the Local Plan: Allocations, SDNP Local Plan or Neighbourhood Plans and settlement policy boundaries adjusted accordingly.

Housing should be accommodated through development and redevelopment opportunities within existing settlement policy boundaries in the first instance. In addition to sites allocated to meet the housing numbers set out above, and development in accordance with Policies CP14 and CP19, housing and other small scale development outside settlement policy boundaries will only be permitted where it:

- meets a community need or realises local community aspirations;
- reinforces a settlement's role and function;
- cannot be accommodated within the built up area; and
- 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.

Within the South Downs National Park any housing provision should meet the needs of local communities in the National Park.

- 1.7 From CP10 it was determined that as a Level 3 settlement, Four Marks /'South Medstead' would be developed with a minimum of 175 dwellings.
- 1.8 It must be noted that when the EHDC LP1 – JCS was examined, the Examiner , Jonathan Bore , MRTPI, in his **Report to East Hampshire District Council on the East Hampshire District Local Plan: Housing and Employment Allocations** 15th February

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2016, noted with regard to Four Marks/ 'South Medstead'⁹:

"Four Marks and 'South Medstead'"

The JCS requires allocations for a minimum of 175 dwellings. Site FM1, Lymington Farm is allocated for about 107 dwellings, FM2, land at Friars Oak Farm, Boyneswood Road, is allocated for about 79 dwellings, and site FM3, Land north of Boyneswood Road, Medstead, is allocated for about 51 dwellings. All three sites have planning permission.

*There are additional housing commitments in Four Marks and 'South Medstead' amounting to some 79 dwellings that are not allocated in the plan. The overall JCS requirement is significantly exceeded and although additional sites have been put forward in representations there is no need to allocate further sites. **Indeed, any significant further increase could begin to conflict with the JCS in terms of the scale and distribution of development between the settlements.***

- 1.9 Mr Bore notes that the building of additional houses over and above his total of 316 in Four Marks/ 'South Medstead' would cause an imbalance and hence be in conflict with the philosophy of LP1 – JCS.

⁹ Medstead and Four Marks Neighbourhood Plan Examination, A Report to East Hampshire District Council. Examiner Nigel McGurk - November 2015

<https://www.easthants.gov.uk/sites/default/files/documents/Medstead%20%26%20Four%20Marks%20Neighbourhood%20Plan%20Examiner%27s%20%20Report.pdf>

Appendix 2

2. Level 3 Settlement – Four Marks /'South Medstead'

- 2.1 EHDC identified Four Marks /'South Medstead' as a Level 3 Settlement in its 2018 Core Strategy Issues & Options, Background paper for Settlement Hierarchy ¹⁰



Ordnance survey licence 100024238

Map 1: EHDC Interactive Map showing Four Marks/ 'South Medstead' Settlement

Note: Green Line - Eastside Ward Boundary – Four Marks/Medstead and Chawton
Westside Ward Boundary - Four Marks/Medstead and Ropley

- 2.2 From the EHDC interactive map, showing the CP10 settlement of Four Marks/ 'South Medstead', it will be noted that the eastern end of the settlement is in Chawton Civil Parish.

¹⁰ Settlement Hierarchy Background Paper For the East Hampshire District Local Plan Regulation 18 consultation
<https://www.easthants.gov.uk/sites/default/files/documents/Settlement%20Hierarchy%20Background%20Paper%202018.pdf>

Appendix 3

3. EHDC Housing Completion Data

3.1 The net housing data for 2013 was provided by EHDC Housing Officers, see Appendix 4:

2013	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
Large Sites	0	0	0	0	0
Small Sites	4	5	15	0	24
Total	4	5	15	0	24

3.2 The net housing data for 2014 was drawn from the EHDC 5 Year Land Supply 2014 report, dated 1st April 2015:

2014	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
Large Sites	0	0	19	2	21
Small Sites	3	2	9	2	16
Total	3	2	28	4	37

3.3 The net housing data for 2015 was drawn from the EHDC 5 Year Land Supply 2015 report, dated 1st April 2016:

2015	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
Large Sites	0	0	53	0	53
Small Sites	4	5	21	0	28
Total	4	5	74	0	83

3.4 The net housing data for 2016 was drawn from the EHDC 5 Year Land Supply 2016 report, dated 1st April 2017:

2016	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
Large Sites	0	0	38	0	38
Small Sites	7	2	48	20	77
Total	7	2	86	20	115

3.5 The net housing data for 2017 was drawn from the EHDC 5 Year Land Supply 2017 report, dated 1st April 2018:

2017	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
Large Sites	0	116	10	0	126
Small Sites	8	10	6	0	24
Total	2	126	16	0	150

3.6 The net housing data for 2018 was drawn from the EHDC 5 Year Land Supply 2018 report, dated 1st April 2019:

2018	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
Large Sites	7	142	0	0	149
Small Sites	2	0	9	6	17
Total	9	142	9	6	166

3.7 From the data, the housing completed to 1st April 2019:

Completions to 1st April 2018	Medstead	South Medstead	Four Marks	The Shrave Chawton	Total
2013	4	5	15	0	24
2014	3	2	28	4	37
2015	4	5	74	0	83

2016	7	2	86	20	115
2017	8	126	16	0	150
2018	9	142	9	6	166
Change to date	35	282	228	30	575

3.8 The completions for the Level 3 Settlement - Four Marks/ 'South Medstead' is the total for Four Marks, Chawton and 'South Medstead' i.e. 540 and for Medstead is 35 from the 2013 baseline.

3.9 The proposed number of new dwellings in Four Marks/'South Medstead' under CP10, LP1 – JCS was a minimum of 175 houses to be completed by 2028. Thus the 'housing completions' as of 1st April 2019 was some 209% over the proposed minimum.

Appendix 4 EHDC Housing Supply Data

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Appendix 4.7	EHDC 5 Year Land Supply Outstanding Permissions 2017	34

Appendix 4.1

EHDC 2013 Completion data¹¹

ADDRESS		PROPOSAL	DWELLING	BEDS	START GAIN	COMP GAIN	COMP LOSS
BENWHYLES BOYNESWOOD ROAD	South Medstead	DEMOLITION OF SIDE EXTENSION TO BENWHYLES, TWO SEMI-DETACHED AND THREE DETACHED DWELLINGS TO REAR.	HOUSE	3-BED	0	2	0
BENWHYLES BOYNESWOOD ROAD	South Medstead	DEMOLITION OF SIDE EXTENSION TO BENWHYLES, TWO SEMI-DETACHED AND THREE DETACHED DWELLINGS TO REAR.	HOUSE	4-BED	0	3	0
TWINKLE COTTAGE BOYNESWOOD ROAD	South Medstead	TWO DETACHED FOUR BEDROOM DWELLINGS AND ASSOCIATED PARKING (REVISION TO 25227/006) (AS AMENDED BY PLANS RECEIVED 25/07/11)	HOUSE	4-BED	0	1	0
LITTLE ACRE LAND EAST OF WINDSOR ROAD	South Medstead	SINGLE STOREY DWELLING TO REAR OF NEWLANDS.	HOUSE	3-BED	0	1	0
MOORS BOYNESWOOD LANE	South Medstead	REMOVAL OF CONDITION 3 TO APPLICATION 28793/003 - TO ALLOW CONVERSION OF SWIMMING POOL ENCLOSURE TO ANNEXE	ANNEXE	2-BED	0	1	0
MEDSTEAD HARDWARE STORES REAR OF HIGH STREET	Medstead	ONE PAIR OF SEMI-DETACHED DWELLINGS	HOUSE	1-BED	2	0	0
31 ROSEWOOD ABBEY ROAD	Medstead	DETACHED DWELLING FOLLOWING DEMOLITION OF DWELLING	HOUSE	3-BED	0	1	0
OLD FORGE HIGH STREET	Medstead	TERRACE OF THREE DWELLINGS FOLLOWING DEMOLITION OF DWELLING	HOUSE	1-BED	0	1	0
THE FOLLY WIELD ROAD	Medstead	DWELLING AND DETACHED GARAGE AFTER DEMOLITION OF EXISTING DWELLING.	HOUSE	2-BED	0	0	1
THE FOLLY WIELD ROAD	Medstead	DWELLING AND DETACHED GARAGE AFTER DEMOLITION OF EXISTING DWELLING.	HOUSE	4-BED	1	0	0
139 WINTERBORNE WINCHESTER ROAD	Four Marks	DETACHED SINGLE STOREY DWELLING TO SIDE, FOLLOWING DEMOLITION OF GARAGE (AMENDMENT TO PREVIOUSLY APPROVED SCHEME)	HOUSE	2-BED	1	1	0
7-15 LAND REAR OF BLACKBERRY LANE	Four Marks	FOUR TWO STOREY DWELLINGS WITH GARAGES (VARIATION OF 51818/002 ALLOWED ON APPEAL)	HOUSE	3-BED	0	1	0
7-15 LAND REAR OF BLACKBERRY LANE	Four Marks	FOUR TWO STOREY DWELLINGS WITH GARAGES (VARIATION OF 51818/002 ALLOWED ON APPEAL)	HOUSE	5-BED	0	2	0
7-15 LAND REAR OF BLACKBERRY LANE	Four Marks	FOUR TWO STOREY DWELLINGS WITH GARAGES (VARIATION OF 51818/002 ALLOWED ON APPEAL)	HOUSE	4-BED	0	1	0

¹¹ Data provided by EHDC Planning Officers August 2018

ADDRESS		PROPOSAL	DWELLING	BEDS	START GAIN	COMP GAIN	COMP LOSS
THE BRACKENS AND CASTANEA LAND TO THE NORTH OF THE SHRAVE	Four Marks	THREE DETACHED DWELLINGS WITH PARKING, LANDSCAPING AND ACCESS VIA HANDYSIDE PLACE.	HOUSE	4-BED	0	2	0
3 LAND EAST OF CRANFORD TELEGRAPH LANE	Four Marks	DETACHED DWELLING FOLLOWING DEMOLITION OF GARAGE	HOUSE	1-BED	1	0	0
81 FUCHSIA COTTAGE BLACKBERRY LANE	Four Marks	REPLACEMENT DWELLING FOLLOWING DEMOLITION OF PROPERTY	HOUSE	4-BED	0	1	0
HAWTHORN FARM WILLIS LANE	Four Marks	REPLACEMENT 2-STOREY DWELLING	HOUSE	UNK N	0	0	1
COLD CONTROL SERVICES STATION APPROACH	Four Marks	SEVEN DWELLINGS INCLUDING PARKING, LANDSCAPING, BIN STORAGE, TURNING AND ACCESS FOLLOWING DEMOLITION OF EXISTING BUILDINGS	HOUSE	3-BED	2	2	0
COLD CONTROL SERVICES STATION APPROACH	Four Marks	SEVEN DWELLINGS INCLUDING PARKING, LANDSCAPING, BIN STORAGE, TURNING AND ACCESS FOLLOWING DEMOLITION OF EXISTING BUILDINGS	HOUSE	2-BED	5	5	0
68 LYMINGTON BOTTOM	Four Marks	REVISED PROPOSALS FOR TWO DETACHED DWELLINGS, APPROVED UNDER REFERENCE 23112/001.	HOUSE	4-BED	0	1	0
68 LYMINGTON BOTTOM	Four Marks	REVISED PROPOSALS FOR TWO DETACHED DWELLINGS, APPROVED UNDER REFERENCE 23112/001.	HOUSE	3-BED	1	0	0
24 PILGRIMS CORNER LYMINGTON BOTTOM	Four Marks	DETACHED DWELLING	HOUSE	3-BED	1	1	0
30 LAND ADJACENT TO THE WINDMILL INN WINCHESTER ROAD	Four Marks	EIGHT DWELLINGS WITH ASSOCIATED PARKING, TURNING, ACCESS, LANDSCAPING AND BIN STORAGE.	HOUSE	4-BED	5	0	0
30 LAND ADJACENT TO THE WINDMILL INN WINCHESTER ROAD	Four Marks	EIGHT DWELLINGS WITH ASSOCIATED PARKING, TURNING, ACCESS, LANDSCAPING AND BIN STORAGE.	HOUSE	3-BED	3	0	0
			Total		22	28	2

Appendix 4.2

EHDC 2014 Completion data ¹²

Large Sites	Completions				
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
52501/002	RESERVE HOUSING ALLOCATION BRISLANDS LANE	FOUR MARKS	19	0	19
32658/003/FUL	QUAVERS REST LAND AT THE SHRAVE	CHAWTON	1	0	1
26077/004	NORTHBOURNE LAND REAR OF THE SHRAVE	CHAWTON	1	0	1
		Total	21	0	21
Small Sites	Completions				
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
34149/012/FUL	OAKLANDS THE SHRAVE	CHAWTON	2	0	2
49866/004	MARCHWOOD, THE WREKIN & WOODVIEW REAR OF THE SHRAVE	CHAWTON	0	0	0
54493	15 BLACKBERRY LANE	FOUR MARKS	0	1	-1
53822/001	3 LAND EAST OF CRANFORD TELEGRAPH LANE	FOUR MARKS	1	0	1
53264/002	WHYTE GATE, TWO OAKS AND WOODLANDS NORTH OF THE SHRAVE	FOUR MARKS	0	0	0
23112/002	68 LYMINGTON BOTTOM	FOUR MARKS	1	0	1
20171/015	30 LAND ADJACENT TO THE WINDMILL INN WINCHESTER ROAD	FOUR MARKS	8	0	8
26306/008	20 GLENTHORNE LYMINGTON BOTTOM	FOUR MARKS	1	0	1
31677/003	WYMOND DENE ALTON LANE	FOUR MARKS	1	0	1
35807/010	KINGSWOOD ALTON LANE	FOUR MARKS	1	1	0
54942/004	HILLSIDE WILLIS LANE	FOUR MARKS	0	1	-1
27747/008	15 PINE RIDGE LYMINGTON BOTTOM ROAD	FOUR MARKS	0	0	0
37012/001	GREENWAYS FARM BRISLANDS LANE	FOUR MARKS	0	1	-1
55422	1A OAK GREEN PARADE WINCHESTER ROAD	FOUR MARKS	0	1	-1
28346/002	WESTEND VALE WEST END LANE	MEDSTEAD	1	1	0

¹² EHDC 5 Year Land Supply report 2014

25099/015	BOYNESWOOD YARD BOYNESWOOD LANE	SOUTH MEDSTEAD	3	0	3
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
21263/005	THE RECTORY TRINITY HILL	MEDSTEAD	1	0	1
35954/001	THE FOLLY WIELD ROAD	MEDSTEAD	1	0	1
54291/001	OVERDALE UPPER SOLDRIDGE ROAD	MEDSTEAD	0	1	-1
22638/002	74 WISTARIA LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	0	1	-1
22983/008	CEDAR STABLES CASTLE STREET	MEDSTEAD	3	1	2
		Total	24	9	15

Appendix 4.3

EHDC 2015 Completion data ¹³

Large sites					
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
52501/002	RESERVE HOUSING ALLOCATION BRISLANDS LANE	FOUR MARKS	53	0	53
		Total	53	0	53
Small sites					
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
22112/016	148-154 WINCHESTER ROAD	FOUR MARKS	8	2	6
22112/021	148 THE BUNGALOW WINCHESTER ROAD	FOUR MARKS	1	0	1
21149/008	THE LIMES STATION APPROACH	FOUR MARKS	0	1	-1
54143	48 GLENTHORNE TELEGRAPH LANE	FOUR MARKS	1	1	0
54493	15 BLACKBERRY LANE	FOUR MARKS	1	0	1
53264/002	WHYTE GATE, TWO OAKS AND WOODLANDS LAND TO THE NORTH OF THE SHRAVE	CHAWTON	9	0	9
27747/008	15 PINE RIDGE LYMINGTON BOTTOM ROAD	FOUR MARKS	2	0	2
22638/002	74 WISTARIA LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	5	0	5
37012/001	GREENWAYS FARM BRISLANDS LANE	FOUR MARKS	1	0	1
49399/001	137 WINCHESTER ROAD	FOUR MARKS	1	0	1
55202/001	33 WINDMILL FIELDS	FOUR MARKS	2	0	2
21566/005	CHURCHILLS BRISLANDS LANE	FOUR MARKS	0	1	-1
23228/003/FUL	OLD FORGE HIGH STREET	MEDSTEAD	1	0	1
51402/004	MEDSTEAD GRANGE TRINITY HILL	MEDSTEAD	3	0	2
25979/004	BARN END WIELD ROAD	MEDSTEAD	0	1	-1
		Total	35	6	28

¹³ EHDC 5YearLandSupplyreport2015

Appendix 4.4

EHDC 2016 Completion data ¹⁴

Large Sites	Completions				
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
52501/002	RESERVE HOUSING ALLOCATION BRISLANDS LANE	FOUR MARKS	38	0	38
		Total	38	0	38
Small Sites	Completions				
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
55155/003	HERRIES TO LITTLE OAKS LAND TO THE NORTH OF THE SHRAVE	CHAWTON	8	0	8
38654/002	91 EREHWON WINCHESTER ROAD	FOUR MARKS	3	1	2
55397/002	89 ROMANY WINCHESTER ROAD	FOUR MARKS	1	0	1
25235/008	100 WINCHESTER ROAD	FOUR MARKS	0	0	0
25235/008	100 WINCHESTER ROAD	FOUR MARKS	0	1	-1
49989/001/FUL	WILD ACRES STATION APPROACH	FOUR MARKS	2	0	2
53279	91 OLD PASTURE FARM BLACKBERRY LANE	FOUR MARKS	1	1	0
49866/004	MARCHWOOD, THE WREKIN & WOODVIEW LAND TO THE REAR OF THE SHRAVE	CHAWTON	8	0	8
54942/004	HILLSIDE WILLIS LANE	FOUR MARKS	1	0	1
20171/021	30 THE WINDMILL INN WINCHESTER ROAD	FOUR MARKS	4	0	4
55766	71 MAYTREES LYMINGTON BOTTOM	FOUR MARKS	2	1	1
55936	LYNDENHURST TO MARCHWOOD LAND NORTH OF THE SHRAVE	CHAWTON	4	0	4
54970/002	WOODFIELD WINDSOR ROAD	SOUTH MEDSTEAD	3	1	2
23228/003/FUL	OLD FORGE HIGH STREET	MEDSTEAD	1	0	1
30742/005	BALIMA PAICE LANE	MEDSTEAD	1	1	0

¹⁴ EHDC 5YearLandSupplyreport2016

33485/002	FOXWOOD ROE DOWNS ROAD	MEDSTEAD	1	1	0
54383/001	ROSERY LOWER PAICE LANE	MEDSTEAD	1	1	0
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
50313/001	TOWNGATE FARM HOUSE LAND NORTH OF WIELD ROAD	MEDSTEAD	4	0	4
54643/004	PAX GROSVENOR ROAD	MEDSTEAD	0	1	-1
25979/004	BARN END WIELD ROAD	MEDSTEAD	4	0	4
30039/003	STEVENSTONE ROE DOWNS ROAD	MEDSTEAD	0	1	-1
		Total	49	10	39

Appendix 4.5

EHDC 2017 Completion data ¹⁵

Large Sites	Completions				
Application	Address	Settlement (JCS Policy CP10)	Gross Completions	Completed Loss	Net Completions
53305/004	LYMINGTON FARM INDUSTRIAL ESTATE, LAND TO THE WEST OF LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	46		46
53305/006	LYMINGTON FARM INDUSTRIAL ESTATE, LAND TO THE WEST LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	23		23
53305/005	LYMINGTON FARM INDUSTRIAL ESTATE, LAND TO THE WEST OF LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	7		7
22160/007	1-3 LAND REAR OF GLOUCESTER CLOSE	FOUR MARKS	42		42
25256/032	FRIARS OAK FARM, LAND AT BOYNESWOOD ROAD	SOUTH MEDSTEAD	31		31
55197/002	LAND EAST OF (20-38) LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	149	0	149
	Total		127	1	126
Small Sites	Completions	Settlement (JCS Policy CP10)	Gross Completions	Completed Loss	Net Completions
55766	71 MAYTREES, LYMINGTON BOTTOM	FOUR MARKS	1	0	1
21566/005	CHURCHILLS, BRISLANDS LANE	FOUR MARKS	1	0	1
25235/008	100 WINCHESTER ROAD	FOUR MARKS	4	0	4
54970/005	WOODFIELD, WINDSOR ROAD	SOUTH MEDSTEAD	4	0	4
21957/010	HIGH MEAD, PLOT EAST OF BOYNESWOOD LANE	SOUTH MEDSTEAD	2	0	2
56360	FIRFIELD, WINDSOR ROAD	SOUTH MEDSTEAD	1	0	1
36404/002	TOWER HURST, WINDSOR ROAD	SOUTH MEDSTEAD	1	0	1
27121/005	MEDSTEAD HARDWARE STORES, HIGH STREET	MEADSTEAD	2	0	2
55275/002	KITWOOD PLACE, LAND EAST OF LYEWAY LANE	FOUR MARKS	0	0	0
37904/FUL	JUBILEE COTTAGE, HIGH STREET	MEADSTEAD	1	0	1

¹⁵ ¹² EHDC 5 Year Land Supply report 2017

Small Sites	Completions	Settlement (JCS Policy CP10)	Gross Completions	Completed Loss	Net Completions
20897/004	ASHLING, ROOKWOOD LANE	MEADSTEAD	1	1	0
27121/005	MEDSTEAD HARDWARE STORES, HIGH STREET	MEADSTEAD	2	0	2
23903/002	KELMSCOT, HATTINGLEY ROAD	MEADSTEAD	1	1	0
54291/001	OVERDALE UPPER, SOLDRIDGE ROAD	MEADSTEAD	1	0	1
30843/010	MEADOW FARM STUD, WIELD ROAD	MEADSTEAD	0	0	0
54643/004	PAX, GROSVENOR ROAD	MEADSTEAD	1	0	1
30039/003	STEVENSTONE, ROE DOWNS ROAD	MEADSTEAD	1	0	1
57001	MILBERRY CLOSE, GOATACRE ROAD	MEADSTEAD	0	1	-1
39646/021	NORTHFIELD STABLES, SOLDRIDGE ROAD	MEADSTEAD	1	0	1
	Total		25	3	22

Appendix 4.6

EHDC 2018 Completion data ¹⁶

Large Sites	Completions				
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
25256/032	FRIARS OAK FARM, LAND AT BOYNESWOOD ROAD	SOUTH MEDSTEAD	46	0	46
53305/005	LYMINGTON FARM INDUSTRIAL ESTATE LAND TO THE WEST OF LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	23	0	23
55010/004	CEDAR STABLES, LAND EAST OF CASTLE STREET	MEDSTEAD	7	0	7
55197/002	LAND EAST OF (20-38) LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	42	0	42
55258/004	LAND NORTH OF BOYNESWOOD LANE	SOUTH MEDSTEAD	31	0	31
		Total	149	0	149
Small Sites	Completions				
Application	Address	Settlement	Gross Completions	Completed Loss	Net Completions
49664/002	2 THORN CLOSE	FOUR MARKS	1	0	1
55766/001	71 MAYTREES LYMINGTON BOTTOM	FOUR MARKS	3	0	3
3919/007	WITHIES, THE SHRAVE	FOUR MARKS	6	0	6
55451/001	27 GLENMORE LYMINGTON BOTTOM	FOUR MARKS	2	0	2
34918/005	70 WINCHESTER ROAD	FOUR MARKS	1	0	1
24349/007	AVADI 10 LYMINGTON BOTTOM ROAD	FOUR MARKS	2	0	2
31790/001	ASSISI THE SHRAVE	FOUR MARKS	1	1	0
29846/012	NEW PARK FARM ABBEY ROAD	MEDSTEAD	1	0	1
57001	MILBERRY CLOSE GOATACRE ROAD	MEDSTEAD	1	0	1
55262/002	OAK TREE REDWOOD LANE	MEDSTEAD	1	0	1
		Total	19	1	18

¹⁶ EHDC 5YearLandSupplyreport2018

Appendix 4.7

EHDC Incomplete Permission data 2018 ¹⁷

Large Sites	Outstanding Permissions			
Application	Address	Settlement (JCS Policy CP10)	Net Outstanding	Under Construction
55258/004	LAND NORTH OF BOYNESWOOD LANE	SOUTH MEDSTEAD	20	20
25256/032	FRIARS OAK FARM LAND AT BOYNESWOOD ROAD	SOUTH MEDSTEAD	34	34
		Total	54	54
Small Sites	Outstanding Permissions			
Application	Address	Settlement (JCS Policy CP10)	Net Outstanding	Under Construction
23986/010	HUNTERS PLACE BIGHTON ROAD	MEDSTEAD	1	1
23986/007	GROVE FARM BIGHTON ROAD	MEDSTEAD	1	0
30843/010	MEADOW FARM STUD WIELD ROAD	MEDSTEAD	1	1
30843/010	MEADOW FARM STUD WIELD ROAD	MEDSTEAD	-1	0
24777/006	GLENELDON HOMESTEAD ROAD	MEDSTEAD	1	0
22584/011	ST CATHERINES PAICE LANE	MEDSTEAD	1	0
22584/011	ST CATHERINES PAICE LANE	MEDSTEAD	-1	0
56157/009	NEW CLOVELLY HOMESTEAD ROAD	MEDSTEAD	1	0
56157/009	NEW CLOVELLY HOMESTEAD ROAD	MEDSTEAD	-1	0
56366/005	ANNALIESE SOLDRIDGE ROAD	MEDSTEAD	1	0
56366/005	ANNALIESE SOLDRIDGE ROAD	MEDSTEAD	-1	0
23782/010	THREE BEECH FARM HOMESTEAD ROAD	MEDSTEAD	1	0
32375/003	FAIRFIELD GRAVEL LANE	FOUR MARKS	0	1
25699/003	BRISLANDS BRISLANDS LANE	FOUR MARKS	1	0
25699/003	BRISLANDS BRISLANDS LANE	FOUR MARKS	-1	0
55262/002	OAK TREE REDWOOD LANE	MEDSTEAD	-1	0
56936	LYMINGTON FARM INDUSTRIAL ESTATE LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	3	0
56936	LYMINGTON FARM INDUSTRIAL ESTATE LYMINGTON BOTTOM ROAD	SOUTH MEDSTEAD	4	0

¹⁷ EHDC 5 Year Land Supply report 2018

**MEDSTEAD & FOUR MARKS
NEIGHBOURHOOD PLAN REVIEW**



Land Availability Assessment Summary
October 2019



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Land Availability Assessment Summary

1. Introduction

- 1.1 In December 2018 EHDC published a Land Available Assessment¹⁸. It forms part of the EHDC Evidence base for its Draft Local Plan.
- 1.2 The LAA is a technical study which informs the East Hampshire District Local Plan. It helps to inform future planning policy by assessing land for its development potential. From this assessment, sites can be chosen to be included in the Development Plan to help meet objectively assessed needs.
- 1.3 The LAA assesses land for a variety of land uses:
 - New homes (C3 use class)
 - Mobile homes (C3 use class)
 - Self and / or custom build plots (C3 use class)
 - Older persons accommodation (C2 use class)
 - Gypsy, Traveller and Travelling Showpeople accommodation (suigeneris use class)
 - Employment (office, light / general industrial, storage) (B1, B2 and B8 use classes)
 - Retail (A1 – A5 use classes)
 - Assembly and leisure (e.g. community facilities, recreation facilities) (D2 use class)
 - Cultural and non-residential institutions (e.g. places of worship, museums, schools) (D1 use class)
 - Other, including hotel (C1 use class), and open space.
- 1.3 It is the role of the assessment to provide information on the range of sites which are available to meet need. The LAA:
 - Identifies sites and broad locations with potential for development
 - Assesses their development potential
 - Assesses their suitability for development and the likelihood of development coming forward (the availability and achievability)

¹⁸ EHDC Land Availability Assessment (LAA)
<https://www.easthants.gov.uk/sites/default/files/documents/LAA%20December%202018.pdf>

1.4 The LAA categorises sites as 'developable', 'undevelopable' or 'potential future windfall'.

2. Land In Medstead and Four Marks

2.1 The process identified 24 sites in each of Medstead and Four Marks for further assessment regarding their developability. These sites are detailed in the appendix.

2.2 Of the 24 Medstead sites:

- 15 sites were available for C3 Residential development
- 2 sites C3 Residential, Self/custom build
- 2 sites C3 Residential, Older persons accommodation, Self/custom build
- 1 site C3 Residential, Mobile Homes, Older persons accommodation, Self/custom build
- 1 site C3 Residential, Older persons accommodation, Self/custom build, Leisure
- 1 site C3 Residential, Self/custom build, Employment

2.3 22 were deemed undevelopable. Two sites were deemed developable as potential windfall sites.

2.4 Of the 24 Four Marks sites:

- 11 sites were available for C3 Residential development
- 1 site C3 Residential (C3), Self/custom build
- 1 site C3 Residential, Mobile Homes, Older persons accommodation
- 1 site C3 Residential, Older persons accommodation, Self/custom build, Doctors Surgery
- 1 site C3 Residential, Mobile Homes, Older persons accommodation, Traveller accommodation
- 1 site C3 Residential, Older persons accommodation, Self/custom build, Traveller accommodation
- 3 sites Traveller accommodation
- 1 site nominated for Traveller land by EHDC
- 1 site Mobile Homes, Self/custom build
- 1 site Mobile Homes, Employment
- 1 site hotel

2.5 18 were deemed undevelopable. Five sites were identified as developable together with one potential windfall site.

3. Possible sites

3.1 The two sites in Medstead, are both in 'South Medstead', off Boyneswood Road:

Number	Address	Size (Ha)	Offered for	Assessment
LAA/MED-004	Land rear of Woodview Place and Timbers, Boyneswood Road, Medstead,	1.1	Residential (C3)	Potential future windfall
LAA/MED-013	Land to the east of Boyneswood Road	0.2	Residential (C3)	Potential future windfall

3.2 The six sites in Four Marks are included in the table below .

Number	Address	Size (Ha)	Offered for	Assessment
LAA/FM-001	Land at Headmore Lane, Four Marks Golf Club, Four Marks	7.2	Hotel	Developable
LAA/FM-010	Janeland, Willis Lane, Four Marks	0.5	Traveller accommodation	Developable
LAA/FM-013	Land south of Winchester Road, Four Marks	8.3	Residential (C3)	Developable
LAA/FM-018	Ranch Industrial Estate, Four Marks	1.6	Mobile Homes, Employment	Potential future windfall.
LAA/FM-023	Briars Lodge, Willis Lane, Four Marks, GU34 5AP	0.7	Traveller accommodation	Developable
LAA/FM-024	Land at Alton Lane, Four Marks	0.2	Traveller accommodation	Developable

4. Result of LAA process

4.1 The LAA process was followed by the development of the EHDC Draft Local Plan.

4.2 The following sites were identified for development within the plan

4.2.1 Medstead

None of the two identified sites are currently allocated in the Draft Local Plan. The only Medstead site in the Plan is the existing site, north of Boyneswood Lane which is currently being built out.

4.2.2 Four Marks

Four of the sites are allocated in the in Draft Local Plan.

Site reference	Site address	Allocated for	Timeframe
Site SA25	Land South of Winchester Road, Four Marks	130-150 dwellings	2032/33 – 2035/36
Site SA26	Janeland, Willis Lane	5 Gypsy and Traveller pitches	Within the next 5 years
Site SA27	Briars Lodge, Willis Lane	4 Gypsy and Traveller pitches	Within the next 5 years
Site SA28	Land at Alton Lane	2 Gypsy and Traveller pitches	Within the next 5 years

4.2.2.1 The SA 25 Site is part of the proposal for the Large Development Site - Land South of Winchester Road.

4.2.2.2 The three sites SA26, 27 and 28 currently have Planning Applications before EHDC.

4.3 The possible hotel development in Headmore Lane has not been allocated.

5 Conclusion

5.1 The LAA process identified two possible windfall sites in Medstead.

5.2 Six sites were identified by the process in Four Marks. The residential site, SA25 – Land to the South of Winchester Road, has been put forward as part of the current EHDC Large Development Site Consultation.

5.3 The three Gypsy and Travellers sites, SA26 - Janeland, Willis Lane (5 pitches); SA 27 - Briars Lodge, Willis Lane (4 pitches) and SA28- Land at Alton Lane (2 pitches) are being actively brought forward as viable sites by their promoters.

5.4 The possibility of the hotel on Headmore Lane is not currently being promoted by EHDC.

Appendix - Extract of Four Marks and Medstead LAA Results¹⁹

Four Marks					
Number	Address	Size (Ha)	Offered for	Assessment	Location
LAA/FM-001	Land at Headmore Lane, Four Marks Golf Club, Four Marks	7.2	Hotel	Developable	South Four Marks
LAA/FM-002	Land to the rear of 41 and 43a Blackberry Lane, Four Marks	0.7	Residential (C3)	Undevelopable	South Four Marks
LAA/FM-003	The Paddock, south of Brislands Lane, Four Marks, GU34 5AE	0.8	Residential (C3)	Undevelopable	South Four Marks
LAA/FM-004	Land adjacent to 98 Telegraph Lane, Four Marks, GU34 5AW	0.4	Older persons accommodation	Undevelopable	South Four Marks
LAA/FM-005	Land west of Telegraph Lane and South of Alton Lane, Four Marks	2.4	Residential (C3)	Undevelopable	South Four Marks
LAA/FM-006	Land at Lymington Bottom, Four Marks	0.8	Residential (C3), Older persons accommodation, Self/custom build, Traveller accommodation	Undevelopable	West Four Marks
LAA/FM-007	Land at Uplands Lane, Four Marks, Alton	0.2	Residential (C3)	Undevelopable	West Four Marks
LAA/FM-008	32 Telegraph Lane and 5B Blackberry Lane, Four Marks	1.9	Residential (C3), Mobile Homes, Older persons accommodation, Traveller accommodation	Undevelopable	South Four Marks
LAA/FM-009	The Pines, The Shrave, Four Marks	0.3	Residential (C3), Older persons accommodation, Self/custom build, Doctors Surgery	Undevelopable	East Four Marks
LAA/FM-010	Janeland, Willis Lane, Four Marks	0.5	Traveller accommodation	Developable	South Four Marks
LAA/FM-011	Land rear of 7-15 and 23-33 Blackberry Lane, Four Marks	8.8	Residential (C3)	Undevelopable	South Four Marks
LAA/FM-012	Land at Alton Lane, Four Marks	12.5	Residential (C3)	Undevelopable	South Four Marks
LAA/FM-013	Land south of Winchester Road, Four Marks	8.3	Residential (C3)	Developable	Four Marks/Ropley
LAA/FM-014	Little Kitfield, Gradwell Lane, Four Marks	0.6	Residential (C3), Self/custom build	Undevelopable	South Four Marks

¹⁹ EHDC Land Availability Assessment (LAA)
<https://www.easthants.gov.uk/sites/default/files/documents/LAA%20December%202018.pdf>

Number	Address	Size (Ha)	Offered for	Assessment	Location
LAA/FM-015	Land rear of 97-103 Blackberry Lane, Four Marks	1.7	Residential (C3)	Undevelopable	South Four Marks
LAA/FM-016	Land to the rear of 131 Winchester Road, Four Marks	1.4	Residential (C3), Mobile Homes, Older persons accommodation	Undevelopable	West Four Marks
LAA/FM-017	Woodland at The Shrave, Winchester Road, Four Marks	0.9	Residential (C3)	Undevelopable	East Four Marks
LAA/FM-018	Ranch Industrial Estate, Four Marks	1.6	Mobile Homes, Employment	Potential future windfall.	South Four Marks
LAA/FM-019	Reynards Retreat, Willis Lane, Four Marks	0.4	Mobile Homes, Self/custom build	Undevelopable	South Four Marks
LAA/FM-020	Land east of Brislands Lane and north of Gradwell Lane, Four Marks	6.5	Residential (C3)	Undevelopable	South Four Marks
LAA/FM-021	Land south of Gradwell Lane and west of Kitwood Road, Four Marks	8.8	Residential (C3)	Undevelopable	South Four Marks
LAA/FM-022	Land to the rear of Fordlands, Brislands Lane, Four Marks, GU34 5AD	0.2	Nominated for Traveller land by EHDC	Undevelopable	South Four Marks
LAA/FM-023	Briars Lodge, Willis Lane, Four Marks, GU34 5AP	0.7	Traveller accommodation	Developable	South Four Marks
LAA/FM-024	Land at Alton Lane, Four Marks	0.2	Traveller accommodation	Developable	South Four Marks

Medstead

Number	Address	Size (Ha)	Offered for	Assessment	Location
LAA/MED-001	Land rear of The Haven, Merrow Down and Dinas, Boyneswood Lane, Four Marks	1.6	Residential (C3)	Undevelopable	East South Medstead
LAA/MED-002	Beverley Farm, Five Ash Road, Medstead, GU34 5EJ	1.5	Residential (C3), Mobile Homes, Older persons accommodation, Self/custom build	Undevelopable	North South Medstead
LAA/MED-003	Paddock View, Stoney Lane, Medstead, GU34 5EL	1.5	Residential (C3)	Undevelopable	North South Medstead
LAA/MED-004	Land rear of Woodview Place and Timbers, Boyneswood Road, Medstead, Alton, GU34 5DY	1.1	Residential (C3)	Potential future windfall	East South Medstead

Number	Address	Size (Ha)	Offered for	Assessment	Location
LAA/MED-005	Land at Penilee, Boyneswood Lane, Medstead, GU34 5DZ	3.3	Residential (C3)	Undevelopable	East South Medstead
LAA/MED-006	Land rear of Roscommon, Medstead, GU34 5PH	2.0	Residential (C3), Older persons accommodation, Self/custom build, Leisure	Undevelopable	Medstead Village
LAA/MED-007	Woodlea Farm, Station Approach, Medstead, Alton, GU34 5EN	1.9	Residential (C3), Self/custom build	Undevelopable	North South Medstead
LAA/MED-008	Land adjoining Ashley House, Red Hill, Medstead	0.6	Residential (C3)	Undevelopable	Medstead Village
LAA/MED-009	Land at Five Ash Crossroads, Lymington Bottom Road, Four Marks	2.0	Residential (C3), Self/custom build, Employment	Undevelopable	North South Medstead
LAA/MED-010	The Meadows, Soldridge Road, Medstead	1.1	Residential (C3), Older persons accommodation, Self/custom build	Undevelopable	North South Medstead
LAA/MED-011	Land rear of Junipers, South Town Road, Medstead	2.5	Residential (C3)	Undevelopable	Medstead Village
LAA/MED-012	Land to the east of Boyneswood Road (near Thornybush Gardens)	2.3	Residential (C3)	Undevelopable	East South Medstead
LAA/MED-013	Land to the east of Boyneswood Road	0.2	Residential (C3)	Potential future windfall	South Medstead
LAA/MED-014	Land at Common Hill, Medstead	3.9	Residential (C3)	Undevelopable	Medstead Village
LAA/MED-015	Land at Homestead Road, Medstead	0.7	Residential (C3)	Undevelopable	Medstead Village
LAA/MED-016	Land at Lymington Bottom Road, Medstead (east of)	11.7	Residential (C3)	Undevelopable	South Medstead
LAA/MED-017	Little Pastures, Roedowns Road, Medstead	3.5	Residential (C3)	Undevelopable	Medstead Village
LAA/MED-018	Land north of Wield Road, Medstead	2.8	Residential (C3)	Undevelopable	Medstead Village
LAA/MED-019	Land south of Paice Lane, Medstead	3.1	Residential (C3), Self/custom build	Undevelopable	Medstead Village
LAA/MED-020	Southview, Abbey Road, Medstead	0.9	Residential (C3)	Undevelopable	Medstead Village

Number	Address	Size (Ha)	Offered for	Assessment	Location
LAA/MED-021	Land north of Cedar Stables, Medstead	3.5	Residential (C3), Older persons accommodation, Self/custom build	Undevelopable	Medstead Village
LAA/MED-022	Land west of Lymington Barn, Lymington Bottom Road	4.5	Residential (C3)	Undevelopable	South Medstead
LAA/MED-023	Land to the west of Roe Downs Road, Medstead	9.6	Residential (C3)	Undevelopable	Medstead Village
LAA/MED-024	Land west of Roe Downs Road, Medstead	19.2	Residential (C3)	Undevelopable	Medstead Village

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**MEDSTEAD & FOUR MARKS
NEIGHBOURHOOD PLAN REVIEW**



**Employment Review
August 2019**

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Employment Review

1. Summary

- 1.1 From the Nomis ONS labour statistics²⁰, using the 2017 data set (2019 released 2.10.19), the number of people of working age in Four Marks and Medstead is 3,988.
- 1.2 The number of jobs at that time was 1,540
- 1.3 By reviewing the data, currently over 2,500 villagers commute out of the villages each day i.e. 63%.

2. Medstead and Four Marks

- 2.1 The population of Medstead and Four Marks, as of November 2018, was 7,199 according to the data supplied by Mansfield Park Surgery (email 26.11.18).
- 2.2 From the Office of National Statistics November 2018 Data the active working population of the EHDC Ward of Four Marks and Medstead , EHDC Local Ward Area E36003083, was 3,988 some 1,963 males and 2,025 females. Unemployment is low (see Appendix 1),
- 2.3 The number in work in the villages is around 3,980, compares to 3,056 identified at the time of the 2011 Census, i.e. an additional 924 or 30.24%.

3. Employment Data

- 3.1 The latest data for employment is from the ONS Business Register and Employment Survey 2017²¹. The data is from an employer survey of the number of jobs held by employees broken down by full/part-time and detailed industry (5 digit SIC2007). The survey records a job at the location of an employee's workplace. Thus these figures will not cover sole traders partnerships and professionals that are not employed by 'a company'.
- 3.2 When drilling down to the 2011 Upper Output Areas – Lower layer for the EHDC Ward of Four Marks and Medstead Areas E01022593 (South East Four Marks), E01022594 (South East Medstead), E01022595 (North West Four Marks), and (North West Medstead), E01022596 are identified. The corresponding data for each village is found in Appendix 1
- 3.3 Taking into account the rounding of figures, due to the different data sets used in compiling the figures by category for the employment groups A-U and 1-18, the numbers with a place of work within the villages are:
 - Four Marks between 620 (A-U) and 625 (1-18)

²⁰ Nomis <https://www.nomisweb.co.uk/query>

²¹ Nomis

<https://www.nomisweb.co.uk/query/construct/components/mapHComponent.asp?menuopt=12&subcomp=103>

- Medstead between 890 (A-U) and 920 (1-18)
- Total jobs between 1,510 (A-U) and 1,545 (1-18)
- The data sets has two sets of results for 'Total jobs' 1,510 (A-U) and 1,545 (1-18) and 1,490 for both A-U and 1-18.

3.4 The numbers of full time staff employed is:

- Four Marks between 390 (A-U) and 510 (1-18)
- Medstead between 890 (A-U) and 525 (1-18) Total jobs between 910 (A-U) and 915 (1-18)

3.5 The number of part time posts is:

- Four Marks between 205 (A-U) and 200 (1-18)
- Medstead 375 , both (A-U) and (1-18)
- Total part time jobs between 575 (A-U) and 580 (1-18)

it should be remembered that these jobs within the villages may not be filled by residents of Four Marks and Medstead.

3.6 From 2.2 above we know that the 2018 working population of the villages is 3,988. taking into account those employed in the villages but live elsewhere and sole traders partnerships and professionals, over 2,500 of the residents commute out of the villages.

4. Employment in the Villages

4.1 Without recourse to the EHDC records on those who pay business rates, it is not possible to provide definitive data on businesses that operate from the villages. Nevertheless, the NPSG have compiled a list of those businesses of which they are aware:

4.2 Medstead

- Lymington Barnes, Lymington Bottom Road
- Country Estates, Station Approach
- Woodley Park, Station Approach
- Dukes Mill, Station Approach
- Red Hill Farm, Red Hill Road
- Lower Soldridge Farm, Soldridge Road

4.3 Four Marks

- Industrial Estate, Station Approach
- Industrial Area, Hazel Road
- Lyeway Farm, Lyeway Road
- The Ranch Industrial Estate Willis Lane, also known as the Willis Lane Business Park

4.4 There are also retail outlets in the villages:

a. Medstead

- The Handy Stores and Post Office (convenience store)

- Medstead Hardware,
- b. South Medstead
- WKL Building Supplies
 - Nosh Cafe
 - Reads Butchers
 - Clementine's fruit and Vegetables
 - TDS Saddlery
- c. Four Marks
- The Co-operative Food Four Marks (convenience store) with Post office
 - Tripple fff Brewery
 - Alton Sports
 - Vincent Hire shop
 - Arrows Off Licence
 - Matheson Optometrists
 - China Garden Take away
 - Tesco Express (convenience store)
 - The Saffron – Restaurant
 - Florist
 - The Naked Grape - Beer Wine and Spirit (Retail)
 - Tall Ship - Fish and Chip Shop
 - Four Marks Pharmacy
 - Loaf - Bakers
 - Owen's Cycles
 - First Impression Hair & Beauty – Hairdressers
 - BP Petrol Station, inclusive of a M&S Convenience store
 - Vintage Cupboard (Antiques, vintage & Collectables)
 - Chequers Motor Company
 - Seasons Yoga
 - FM Chiropractical
 - Firework Shop
 - Travel Lodge
 - Garthowen Garden Centre and Tree house Coffee shop

4.5 It is also apparent that when reviewing the internet that there are some 403 businesses and partnerships – 194 'companies' in Four Marks, 42 in Medstead and 85 in South Medstead - Appendix 2.1, being run from the village from sole traders to small companies, although it is difficult to ascertain if the companies are active or dormant. It is known that the list is not complete, as companies known to be based within the villages did not appear when the search was carried out.

4.6 Some 70 'Trade' advertisements in Medstead Times and Four Marks News were reviewed to try to identify businesses that were located in the villages.

- 4.7 There are 25 medical services including the surgeries, physiotherapy, osteopathy and chiropody.
- 4.8 There are 21 trades related to transport, from sales, hire to repair, taxis and coaches and driver training and 1 courier.
- 4.9 There are 10 animal related businesses from vets to dog walking and animal feed.
- 4.10 We have some 71 Consultants covering business, building and engineering' 33 IT companies, 4 security companies, 8 Health and Beauty companies, together with 9 wholesalers and 46 retailers.
- 4.11 There are some 56 companies associated with the building industry and 32 associated with engineering and 22 with property. There are 18 companies associated with horticulture, agriculture or woodland management.
- 4.12 We have some 8 media companies and two photographers.
- 4.13 There are 13 finance companies and 2 associated with the law and four with e-commerce.
- 4.14 We have 14 leisure associated companies, 15 associated with catering and 18 with hospitality

5 Conclusion

- 5.1 Medstead and Four Marks is a vibrant area with an increasing population.
- 5.2 There are employment opportunities within the villages but from the figures produced by the ONS there is insufficient employment to meet the needs of the residents. As a result, many commute to employment elsewhere.
- 5.3 It is apparent that currently over 2,000 villagers commute out of the villages each day.

Appendix 1 Unemployment

The number in the area actively seeking work and claiming benefit has been determined²². Due to the size of the sample and that the figures are rounded to the nearest 5, there is an element of rounding in the results:

In August 2019, the figures was:

- between 33 and 37 people over the age of 16 actively seeking work.
- T between 23 and 27 males over the age of 16 actively seeking work.
- between 13 and 17 females over the age of 16 actively seeking work.

- nobody aged between 16 and 17 actively seeking work.
- between 13 and 17 aged between 18 and 24 actively seeking work.
- between 8 and 12 aged between 25 and 49 actively seeking work.
- between 8 and 12 aged between 50+ actively seeking work.

²² ONS claimant by ward - <https://www.hants.gov.uk/business/ebis/reports>

Appendix 2 Data from ONS Employment Survey 2017²³

Note: The data sets to produce the results for the separate data sets A-U and 1 -18 are not identical thus the resultant figures for the total employment, full time employment and part time employment are not directly equivalent.

The resulting totals produced for A-U and 1-18 give the totals for Medstead and Four Marks using the data sets.

²³ Nomis

<https://www.nomisweb.co.uk/query/construct/components/mapHComponent.asp?menuopt=12&subcomp=103>

Appendix 2.1²⁴

Total Employees in Villages

Employment	Four Marks	Medstead	Total
A : Agriculture, forestry and fishing	0	0	0
B : Mining and quarrying	0	0	0
C : Manufacturing	70	15	85
D : Electricity, gas, steam and air conditioning supply	0	0	0
E : Water supply; sewerage, waste management and remediation activities	10	0	10
F : Construction	60	150	210
G : Wholesale and retail trade; repair of motor vehicles and motorcycles	75	225	300
H : Transportation and storage	0	20	20
I : Accommodation and food service activities	10	70	80
J : Information and communication	55	60	115
K : Financial and insurance activities	0	0	0
L : Real estate activities	0	0	0
M : Professional, scientific and technical activities	45	105	150
N : Administrative and support service activities	25	40	65
O : Public administration and defence; compulsory social security	0	0	0
P : Education	50	55	105
Q : Human health and social work activities	175	125	300
R : Arts, entertainment and recreation	20	0	20
S : Other service activities	30	55	85
T : Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use	0	0	0
U : Activities of extraterritorial organisations and bodies	0	0	0

²⁴ Nomis

<https://www.nomisweb.co.uk/query/construct/components/mapHComponent.asp?menuopt=12&subcomp=103>

1 : Agriculture, forestry & fishing (A)	0	0	0
2 : Mining, quarrying & utilities (B,D and E)	10	0	10
3 : Manufacturing (C)	70	15	85
4 : Construction (F)	60	150	210
5 : Motor trades (Part G)	15	0	15
6 : Wholesale (Part G)	15	25	40
7 : Retail (Part G)	40	170	210
8 : Transport & storage (inc postal) (H)	0	20	20
9 : Accommodation & food services (I)	10	70	80
10 : Information & communication (J)	55	60	115
11 : Financial & insurance (K)	0	0	0
12 : Property (L)	0	0	0
13 : Professional, scientific & technical (M)	45	105	150
14 : Business administration & support services (N)	25	40	65
15 : Public administration & defence (O)	0	0	0
16 : Education (P)	50	55	105
17 : Health (Q)	175	125	300
18 : Arts, entertainment, recreation & other services (R,S,T and U)	50	55	105
Total A-U	625	920	1,545
Total 1- 18	620	890	1,510

Appendix 2.2²⁵

Full Time Employees in Villages

Employment	Four Marks	Medstead	Total
A : Agriculture, forestry and fishing	0	0	0
B : Mining and quarrying	0	0	0
C : Manufacturing	60	15	75
D : Electricity, gas, steam and air conditioning supply	0	0	0
E : Water supply; sewerage, waste management and remediation activities	10	0	10
F : Construction	50	125	175
G : Wholesale and retail trade; repair of motor vehicles and motorcycles	55	95	150
H : Transportation and storage	0	20	20
I : Accommodation and food service activities	0	30	30
J : Information and communication	45	45	90
K : Financial and insurance activities	0	0	0
L : Real estate activities	0	0	0
M : Professional, scientific and technical activities	30	65	95
N : Administrative and support service activities	15	25	40
O : Public administration and defence; compulsory social security	0	0	0
P : Education	10	5	15
Q : Human health and social work activities	100	55	155
R : Arts, entertainment and recreation	10	0	10
S : Other service activities	15	30	45
T : Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use	0	0	0

²⁵ Nomis

<https://www.nomisweb.co.uk/query/construct/components/mapHComponent.asp?menuopt=12&subcomp=103>

U : Activities of extraterritorial organisations and bodies	0	0	0
1 : Agriculture, forestry & fishing (A)	0	0	0
2 : Mining, quarrying & utilities (B,D and E)	10	0	10
3 : Manufacturing (C)	60	15	75
4 : Construction (F)	50	125	175
5 : Motor trades (Part G)	15	0	15
6 : Wholesale (Part G)	10	25	35
7 : Retail (Part G)	20	80	100
8 : Transport & storage (inc postal) (H)	0	20	20
9 : Accommodation & food services (I)	0	30	30
10 : Information & communication (J)	45	45	90
11 : Financial & insurance (K)	0	0	0
12 : Property (L)	0	0	0
13 : Professional, scientific & technical (M)	30	65	95
14 : Business administration & support services (N)	15	25	40
15 : Public administration & defence (O)	0	0	0
16 : Education (P)	10	5	15
17 : Health (Q)	100	55	155
18 : Arts, entertainment, recreation & other services (R,S,T and U)	25	35	60
Total A-U	400	510	910
Total 1= 18	390	525	915

Appendix 2.3 Part Time Employees in Villages ²⁶

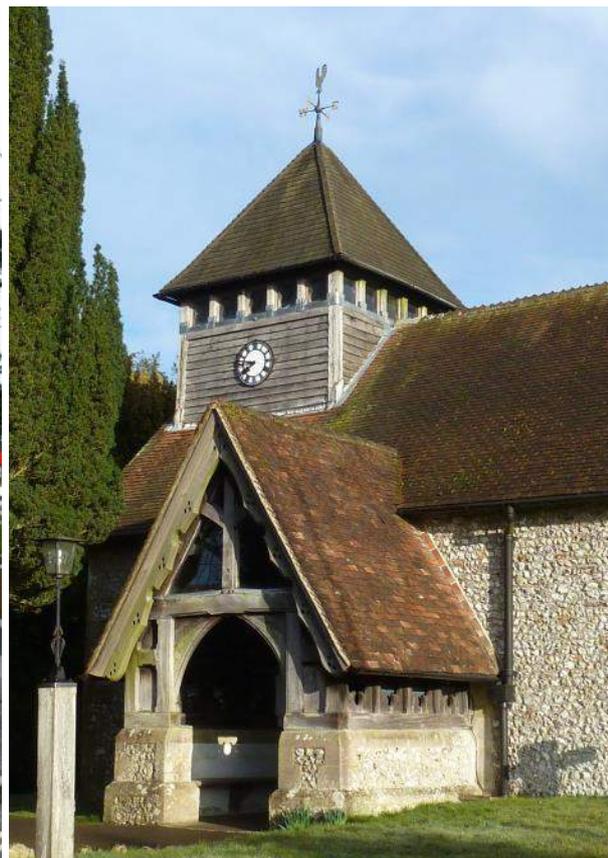
Employment	Four Marks	Medstead	Total
A : Agriculture, forestry and fishing	0	0	0
B : Mining and quarrying	0	0	0
C : Manufacturing	10	0	10
D : Electricity, gas, steam and air conditioning supply	0	0	0
E : Water supply; sewerage, waste management and remediation activities	0	0	0
F : Construction	10	30	40
G : Wholesale and retail trade; repair of motor vehicles and motorcycles	20	95	115
H : Transportation and storage	0	0	0
I : Accommodation and food service activities	10	40	50
J : Information and communication	5	10	15
K : Financial and insurance activities	0	0	0
L : Real estate activities	0	0	0
M : Professional, scientific and technical activities	10	30	40
N : Administrative and support service activities	5	15	20
O : Public administration and defence; compulsory social security	0	0	0
P : Education	40	55	95
Q : Human health and social work activities	70	75	145
R : Arts, entertainment and recreation	10	0	10
S : Other service activities	15	25	40
T : Activities of households as employers; undifferentiated goods-and services-producing activities of households for own use	0	0	0
U : Activities of extraterritorial organisations and bodies	0	0	0

²⁶ Nomis

<https://www.nomisweb.co.uk/query/construct/components/mapHComponent.asp?menuopt=12&subcomp=103>

1 : Agriculture, forestry & fishing (A)	0	0	0
2 : Mining, quarrying & utilities (B,D and E)	0	0	0
3 : Manufacturing (C)	10	0	10
4 : Construction (F)	10	30	40
5 : Motor trades (Part G)	0	0	0
6 : Wholesale (Part G)	0	5	5
7 : Retail (Part G)	20	90	110
8 : Transport & storage (inc postal) (H)	0	0	0
9 : Accommodation & food services (I)	10	40	50
10 : Information & communication (J)	5	10	15
11 : Financial & insurance (K)	0	0	0
12 : Property (L)	0	0	0
13 : Professional, scientific & technical (M)	10	30	40
14 : Business administration & support services (N)	5	15	20
15 : Public administration & defence (O)	0	0	0
16 : Education (P)	40	55	95
17 : Health (Q)	70	75	145
18 : Arts, entertainment, recreation & other services (R,S,T and U)	20	25	45
Total A-U	205	375	580
Total 1= 18	200	375	575

**MEDSTEAD & FOUR MARKS
NEIGHBOURHOOD PLAN REVIEW**



**Transport Review
August 2019**

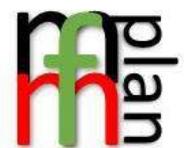


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Transport Review

1. Summary

- 1.1 There is insufficient employment in the villages to support the population thus some of the population must commute out of the village.
- 1.2 There is inadequate public transport. There is no mainline train station. There is a bus service to Alton and Winchester, but most commuters find it inconvenient and therefore use their cars.
- 1.3 From the M&FMNP questionnaire (2015) confirmed that 34% of respondents stated that they commute.

2. Modes of Transport in the Villages

2.1.1 Own Vehicle

2.1.1.1 From the M&FMNP questionnaire, we are aware of some 3,775 regular self driving events, which are linked to 'car sharing' for an additional 1,462 residents, which total 5,237 events.

2.1.1.2 It can be considered that many of the villagers use their vehicles for ease, as public transport pick up points are a distance from their homes and to reduce time constraints to undertake their journeys.

2.1.2 Bus

2.1.2.1 Both Medstead and Four Marks/ 'South Medstead' are served by bus services, including busses to take pupils to the local secondary schools. There are five stops, in both directions, within the SPB on the A31. From the Questionnaire, we are aware of some 668 regular bus events.

2.1.2.2 The settlement is currently served by the Stagecoach in Hampshire route. The service runs at half hour intervals in both directions during the working day with the first bus at around 6.50 a.m. in both directions until 18.03 hrs to Winchester and 18.51 hrs to Alton.

2.1.2.3 For Winchester the next bus is at 19.00 followed by an hourly service starting at 20.30, with the last bus at 23.30.

2.1.2.4 Similarly in the Alton direction there is an hourly service commencing at 19.51 with the last bus at 21.51.

2.1.2.5 A trip to Alton currently costing £4.20 single and £5.80 return and to Winchester, £5.50 single and £7.10 return. Season tickets are available that will reduce the cost of multiple regular journeys.

2.1.2.6 Medstead is served by a bus service. On Tuesdays, Market Day in Alton, and Fridays are served by route 208, a circular bus route, operated by Cresta Coaches, emanating in Alton and doing three circuits during the day via the villages of Beech Medstead, Bentworth and Lashham.

The bus calls at Medstead at 9.49. The return times from Alton are 11.39 and 13.39. The cost is £2.00 per journey.

2.1.3 Train

2.1.3.1 Contrary to popular belief of those who do not live in the area, Medstead and Four Marks Station is not on a commuter line station. It is a station on the Mid Hants Railway which is a heritage railway, run by volunteers especially for tourists and steam enthusiasts.

2.1.3.2 The nearest station is in Alton which can be accessed by car or by the 64 bus. It is 7.2 miles from Four Marks. The 64 bus stops at the station.

2.1.3.3 The trains to London run at a frequency of 2 an hour from 5.42 until 11.44 and from 12.44 until 23.47.

2.1.3.4 The return trains to Alton arrive at a frequency of 2 an hour from 6.40 to 11.40 and from 12.40 until 1.18 the following morning.

2.1.4 Taxi

2.1.4.1 There are two taxi companies within the villages and there are some private hire companies.

3. Voluntary Organisations

3.1 There are voluntary support groups to assist residents needing transport in both villages:

- Four Marks Care
- Medstead Voluntary Care Group

3.2 Both these organisations arrange support to residents on a pre booking system.

3.3 The Medstead Voluntary Care Group can assist with transport to hospital, doctors or dental appointments; collecting prescriptions, pensions or help with shopping.

3.4 Other voluntary groups that provide transport for their own events are the Four Marks over 60's Lunch Club and the Church of the Good Shepherd

4. Commuting

- 4.1 There is insufficient employment in the villages to support the population thus some of the population must commute out of the village.
- 4.2 The first bus out of the village to the east is at 6.51 to Alton.
- 4.3 Although the retail areas of Alton can be easily accessed by the use of public transport, accessing the industrial areas is difficult, as there are only three busses available to get commuters there by 9.00 – 6.51, 7.21 and 8.03.
- 4.4 Commuting to Basingstoke and Guildford by bus is difficult. There is only one bus, the 6.51. Commuting to Petersfield and Liss by bus is impossible.
- 4.5 The first bus out of the village to the west is at 6.48 to Winchester. Three buses allow passenger to commute to New Alresford and Winchester, at 6.48, 7.31 and 8.01.
- 4.6 It appears that public transport alone is impractical for commuting, especially if you need to be in London before 8.00.
- 4.7 The M&FMNP Questionnaire data for January 2015 identified the travel habits of the sample which will be found in Appendix 4

5. Conclusions

- 5.1 There is insufficient employment in the villages to support the population thus some of the population must commute out of the village.
- 5.2 The first bus out of the village to the east is at 6.51 to Alton and the first bus out of the village to the west is at 6.48 to Winchester.
- 5.3 Commuting by bus is possible to Alton, to Guildford and Basingstoke it is only possible by using the 6.51 bus. Commuting to Petersfield and Liss by bus is impossible.
- 5.4 Due to its location commuting by bus to the Alton Industrial areas difficult and it is probable that village residents would travel by other forms of transport.
- 5.5 Three buses allow passenger to commute to New Alresford and Winchester, at 6.48, 7.31 and 8.01.

- 5.6 It appears that current level of development in Medstead and Four Marks makes the area unsustainable for environmental reasons, as a significant proportion of the working population use motor vehicles to get to their place of employment.

Appendix 1 Commuting

- 1.1 The M&FMNP Questionnaire data for January 2015 shows about 1,000 of those who responded to the Questionnaire are commuters, i.e. of our 2,939 residents associated with the questionnaire 34% commute.
- 1.2 The table below shows the travel habits of those of working age between 19 and 64:

Time	No Travel	Walk	Cycle	Drive	Driven	Bus	Train	Taxi	Total
Before 7 30	3	219	110	368	90	31	59	25	430
7.30 - 9.30	1	374	166	618	188	47	57	29	591
Total	4	593	276	986	278	78	116	54	1021

Appendix 2 Timetable information from Stagecoach and South West Trains

November 2018

2.1 Four Marks departures

2.2 Four Marks arrivals

Timetables

South West Trains Timetable:

- 10 - Basingstoke, Alton and Aldershot to London Waterloo

Stagecoach Bus Timetables:

- Stagecoach Timetable Route 13
- Stagecoach Timetable Route 38
- Stagecoach Timetable Route 64
- Stagecoach Timetable Route 65

Bus & Train Time Tables			Departures from Four Marks																				
64	Leaves Four Marks					6.51	7.21																
64	Alton					7.00	7.30			8.18	9.03	9.33	10.03	10.33	11.03	11.33	12.03	12.33	13.03	13.33	14.03	14.33	15.03
64	Alton Stn					7.05	7.35			8.38	9.08	9.38	10.08	10.38	11.08	11.38	12.08	12.38	13.08	13.38	14.08	14.38	15.08
	Train		5.42	6.12	6.44	7.14	7.44	8.14	8.44	9.14	9.44	10.14	10.44	11.15	11.44		12.44	13.15	13.44	14.15	14.44	15.15	
13	Alton Liphook	39'					08:01			09:10	09:51			11:10	.	12:10		13:11		14:10		15:10	
13	Alton Basingstoke	50'				07:20	08:15			09:07	09:35		09:44		11:55		12:55	13:30	13:55		14:55		
38	Alton Petersfield	51'					08:34								11:34				13:34				
65	Guildford	50'				07:20	08:55				09:55			11:20		12:20		13:20			14:35		
64	Leaves Four Marks					6.48	7.31	8.01		9.03	9.33	10.03	10.33	11.03	11.33	12.03	12.33	13.03	13.33	14.03	14.33	15.03	
64	New Alresford	12'				7.00	7.45	8.15		9.17	9.47	10.17	10.47	11.17	11.47	12.17	12.47	13.17	13.47	14.17	14.47	15.17	
64	Winchester	39'				7.20	8.10	8.40		9.37	10.07	10.37	11.07	11.37	12.07	12.37	13.07	13.37	14.07	14.37	15.07	15.37	
64	Leaves Four Marks		15.23	15.53	16.23	16.53	17.23	17.53	18.23	18.51		19.51		20.51		21.51							
64	Alton		15.33	16.03	16.33	17.03	17.33	18.03	18.33	19.00		20.00		21.00		22.00							
64	Alton Stn		15.38	16.08	16.38	17.08	17.38	18.08	18.38	19.05		20.05		21.05		22.05							
	Train		15.44	16.15	16.44	17.15	17.44	18.15	18.44	19.15	19.44	20.15	20.44	21.15	21.44	22.15	22.43	23.47					
13	Alton Liphook	39'	16:20	16:51	17:23	17:53	18:23	19:05	20:05														
13	Alton Basingstoke	50'	15:55	16:11	16:55		17:56		18:54														
38	Alton Petersfield	51'	15:34	16:29		17:44																	
65	Guildford	50'	15:35		16:35	17:45			18:45	19:40													
64	Leaves Four Marks		15.33	16.03	16.33	17.03	17.33	18.03		19.00			20.30		21.30		22.30						
64	New Alresford	12'	15.47	16.17	16.47	17.17	17.47	18.17		19.14			20.44		21.44		22.44						
64	Winchester	39'	16.07	16.37	17.07	17.37	18.07	18.37		19.30			21.00		22.00		23.00						

Bus & Train Time Tables			Arrivals to Four Marks																				
64	Arrives Four Marks	journey	6.48	7.31	8.01		9.03	9.33	10.03	10.33	11.03	11.33	12.03	12.33	13.03	13.33	14.03	14.33	15.03	15.33	16.03	16.33	
Leaves																							
64	Alton		6.36	7.17	7.47		8.50	9.20	9.50	10.20	10.50	11.20	11.50	12.20	12.50	13.20	13.50	14.20	14.50	15.20	15.50	16.20	
64	Alton Stn		6.33	7.12	7.42		8.45	9.15	9.45	10.15	10.45	11.15	11.45	12.15	12.45	13.15	13.45	14.15	14.45	15.15	15.45	16.15	
	Train			6.40	7.11	7.42	8.10	8.40	9.10	9.40	10.10	10.40	11.11	11.40		12.40	13.11	13.40	14.11	14.40	15.11	15.40	
13	Basingstoke	39'					08:01	09:10		09:51		11:10	12:10		13:11		14:10		15:10			16:20	
13	Liss	50'			7.20		8.15		9.40			10.58		11.55		12.55	13.30	13.55		15.01		16.11	
38	Petersfield	51'					8:06		9:40			11:10				13:10				15:10			
65	Guildford	50'	6.30	7.10			8.25		9.45			11.15		12.15		13.15		14.15		15.15			
64	Arrives Four Marks		6.51	7.21	8.03		8.52	9.23	9.53	10.23	10.53	11.23	11.53	12.23	12.53	13.23	13.53	14.23	14.53	15.23	15.53	16.23	
Leaves																							
64	Winchester	39'	6.20	6.50	7.25		8.50	9.20	9.50	10.20	10.50	11.20	11.50	12.20	12.50	13.20	13.50	14.20	14.50	15.20	15.50		
64	New Alresford	12'	6.39	7.09	7.44		9.09	9.39	10.09	10.39	11.09	11.39	12.09	12.39	13.09	13.39	14.09	14.39	15.09	15.39	16.09		
64	Arrives Four Marks		17.03	17.33	18.03		19.00		20.30			21.30		22.30		23.30							
Leaves																							
64	Alton		16.50	17.20	17.50		18.50		20.18			21.18		22.18		23.18							
64	Alton Stn		16.45	17.15	17.45		18.45		20.15			21.15		22.15		23.15							
	Train		16.11	16.40	17.11	17.39	18.09	18.31	19.01	19.31	20.02	20.39	21.10	21.39	22.10	22.39	23.09	23.41	0.10	0.40	1.18		
13	Basingstoke	39'		16:51	17:23	17:53	18:23		19:05			20:05											
13	Liss	50'		17.00		17.56	18.56																
38	Petersfield	51'			17:20																		
65	Guildford	50'	16.25		17.32		18.32		19.32														
64	Arrives Four Marks		16.53	17.23	17.53		18.23	18.51		19.51				20.51		21.51							
Leaves																							
64	Winchester	39'	16.20	16.50	17.20		17.50	18.20		19.20				20.20		21.20							
64	New Alresford	12'	16.39	17.09	17.39		18.09	18.39		19.39				20.39		21.39							

**MEDSTEAD & FOUR MARKS
NEIGHBOURHOOD PLAN REVIEW**



Education Review
September 2019



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Education Review

1. Summary

- 1.1 There are no secondary schools in Four Marks or Medstead.
- 1.2 The primary school in Medstead is full and cannot be expanded.
- 1.3 The primary school in Four Marks is full, but in the process of being expanded. An additional 105 places have been planned to be available from Sept 2020.
- 1.4 This increase will not meet the needs of the 625+ new houses that will have been built in Four Marks/'South Medstead by then. Using the LEAs formula, 625+ new dwellings would require 188 additional places.

2. Schools

- 2.1 The Local Education Authority is Hampshire County Council.
- 2.2 There is a nursery school in Medstead at St Lucy's convent, run by Alton School.
- 2.3 Medstead and Four Marks are served by primary schools in Four Marks and Medstead
- 2.4 There are also primary schools in the neighbouring villages of Chawton, Bentworth, Preston Candover and Ropley.
- 2.5 There are no secondary schools in M&FM. The nearest secondary schools are Amery Hill School and Eggar's School in Alton, and Perins Academy in New Alresford.
- 2.6 There is no tertiary education in M&FM. The nearest FE colleges are Alton College in Alton or Peter Symonds College in Winchester.

3. Catchment Areas

- 3.1 The catchment areas for local schools can be found on the Hampshire County Council Web site:
<https://www.hants.gov.uk/educationandlearning/findaschool/>
and the capacity and roll data can be found on the Get Information about Schools website.
<https://get-information-schools.service.gov.uk>

4. Pupil Numbers and local primary schools

- 4.1 Medstead CofE Primary School: capacity of 210 in 7 year groups i.e. 30 per year group.

4.2 Using the LEA formula there are places in Medstead primary school to meet the needs of 700 dwellings. There are 1,210 dwellings in Medstead parish.

4.3 Four Marks CofE Primary School: a capacity of 315, in 7 year groups i.e. 45 per year. The School was increased by 105 places in 2011 and another 105 places are in the process of being provided.

Using the LEA formula there are currently places in Four Marks primary school to meet the needs of 1050 dwellings. There are 1,789 dwellings in Four Marks parish.

4.4 The housing numbers in the two parishes have increased between 2011 and 2019 as follows:

Housing	Medstead	Four Marks	Total
2011 Census	851	1562	2413
2019	1210	1789	2999
Change	364	235	599
% Change	42.19%	14.53%	24.29%

4.5 This using the Hampshire County Council data of an increase of 0.3 primary pupil per new house and 0.21 secondary pupil per new house the results for houses built to 1st April 2019 is:

Pupil Change	Medstead	Four Marks	Total
Primary	109	71	180
Secondary	76	49	126
Total	186	120	305

4.6 The additional 628 new houses will generate the following number of additional pupils.

	Medstead	Four Marks	Total
Planned Housing	74	14	88
Primary	22	4	26
Secondary	16	3	18
Total	38	7	45

4.7 Thus the housing development planned to date has increased the need for school places by an additional 206 primary places and 144 Secondary places, a total of 350.

5. Pupil numbers and local secondary schools

5.1 For Secondary schools

The local secondary schools are Amery Hill School and Eggar's School in Alton and Perins Academy in New Alresford.

5.2 From the 2017 data it can be seen that the subscribed capacity of each school was

- Perins Academy - 107.06%,
- Amery Hill – 91.1%,
- Eggar's School - 109.09%,

This data predates the 'build out' of the majority of the required 700 houses in Alton.

6. Note provided by HCC

6.1 Hampshire County Council, the LEA, advise that in order to be full each of these schools has an element of out of catchment recruitment. Consequently the anticipated yield from all the new development will fit in these schools.

Appendix 1

An email sent to the M&FM NP steering Group by Martin Shefferd, HCC in an email in 2014:

'HCC LEA use a pupil yield figure of 0.3 primary age pupil per dwelling and 0.21 secondary age pupil per dwelling. In essence for every 100 new houses built HCC would expect 30 primary age pupils (across all 7 year groups) and 21 secondary age pupils (across all 5 year groups).

'At Sept 2014 the additional 143 houses built an increase of 43 primary age pupils, approximately 6 per year group and 30 secondary age pupils, again approximately 6 per year group.

' September 2014

'Four Marks (capacity of 296 places) reported having 254 pupils on roll on 2 October (schools census day) and this is forecast to rise as the additional pupils arrive from the developments around the area. In order to ensure a sufficiency of school places for Four Marks the school is to be expanded to allow up to 45 pupils per year group to be offered a place at the school. In the longer term, and at the appropriate time, there is an opportunity for Four Marks to be expanded further to allow up to 60 children per year group to be offered a place.

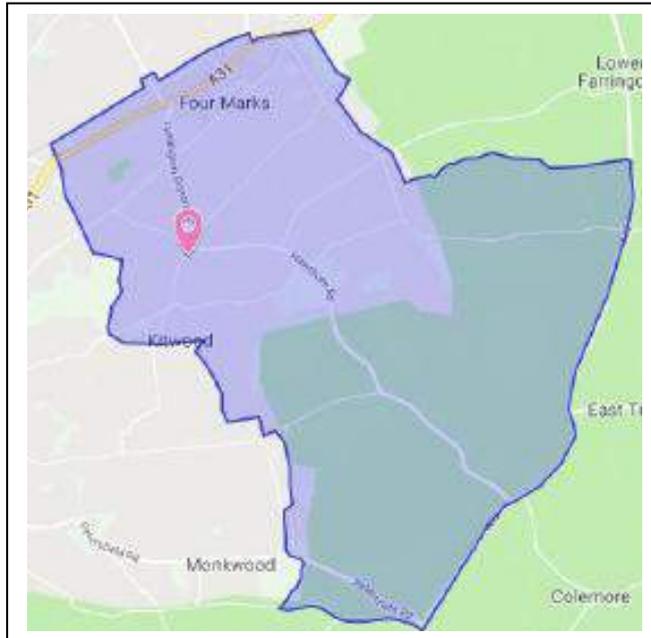
'Similarly Medstead (capacity 210 places) reported having 204 pupils on roll in October and this is forecast to remain at a similar level for the foreseeable future.'

Appendix 2 School Catchment Areas

2.1 Primary Schools

2.1.1 Four Marks

The catchment area for Four Marks CofE Primary School is shown below. The pupil capacity is 315 and the currently published number on the roll is 303.



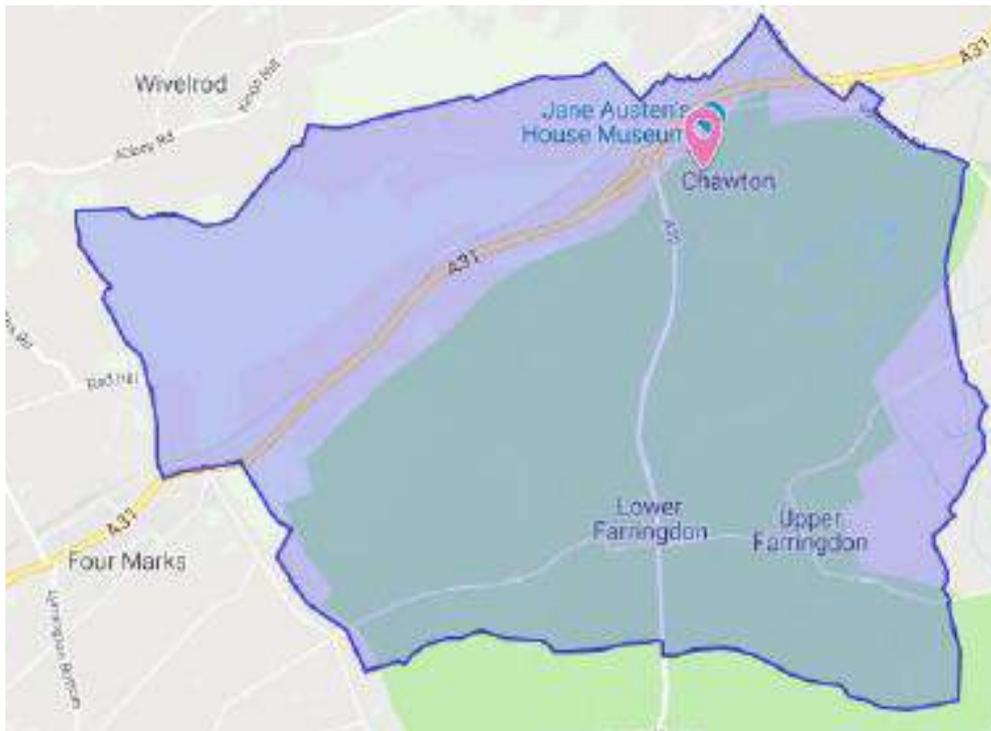
2.2.2 Medstead

The catchment area for Medstead CofE Primary School is shown below. The pupil capacity is 216 and the currently published number on the roll is 212.



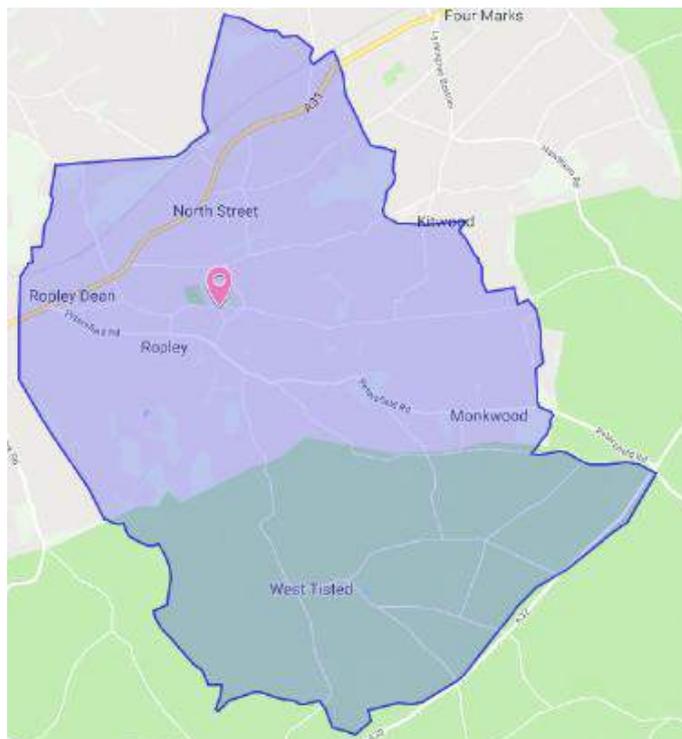
2.1.3 Chawton

The catchment area for Chawton CofE Primary School is shown below. The pupil capacity is 140 and the currently published number on the roll is 100.



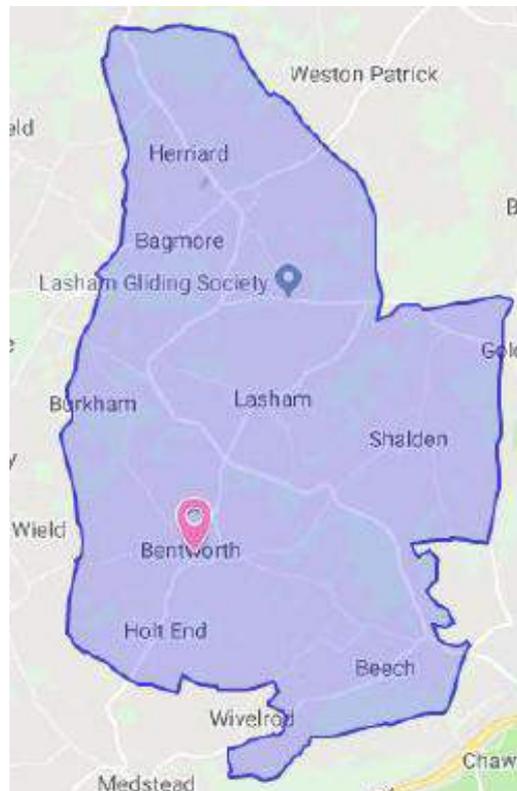
2.1.4 Ropley

The catchment area for Ropley CofE Primary School is shown below. The pupil capacity is 175 and the currently published number on the roll is 156.



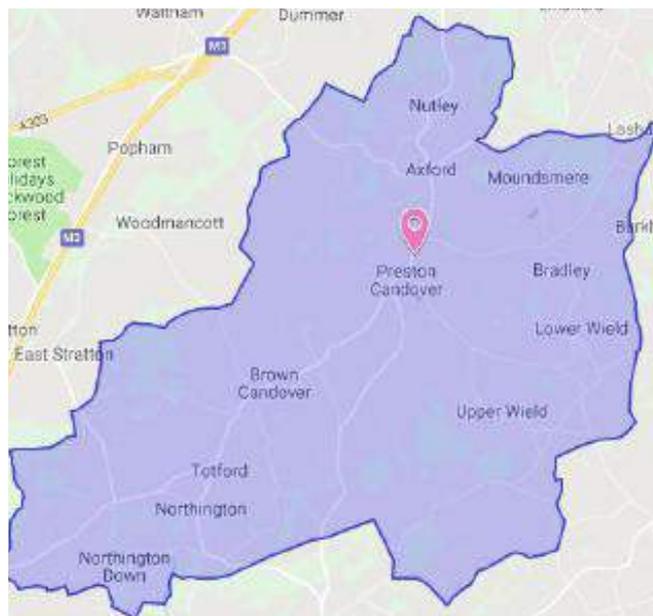
2.1.5 Bentworth

The catchment area for St Mary's Bentworth CofE Primary School is shown below. The pupil capacity is 109 and the currently published number on the roll is 106.



2.1.6 Preston Candover

The catchment area for Preston Candover CofE Primary School is shown below. The pupil capacity is 145 and the currently published number on the roll is 140.



4.2 Secondary Schools

4.2.1 New Alresford

The catchment area for Perins Academy is shown below. The pupil capacity is 1075 and the currently published number on the roll is 1,151.



4.2.2 Alton

The catchment area for Amery Hill School is shown below. The pupil capacity is 1,000 and the currently published number on the roll is 911.



The catchment area for Eggar's School is shown below. The pupil capacity is 858 and the currently published number on the roll is 936.



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Core Document 7

**MEDSTEAD & FOUR MARKS
NEIGHBOURHOOD PLAN REVIEW**



Medical Review

August 2019



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Medical Review

1. Summary

- 1.1 The number of appointments per registered patient has increased significantly in recent years putting pressure on the medical staff in the local surgeries
- 1.2 The surgeries have responded by increasing their medical staff, but this has not kept pace with the number of appointments.
- 1.3 The number of patients who have registered with the local surgeries has not increased significantly in the last 4 years. This suggests that many of the residents from the new 628 houses have not yet registered with a local doctor.

2. Services

- 2.1 There are two medical Surgeries in the area:
 - Boundaries Surgery, Winchester Road in Four Marks
 - Mansfield Park Surgery, on Lymington Barnes, Lymington Bottom Road Medstead
- 2.2 There is one dental surgery on the County Estates site on Station Approach, Medstead.
- 2.3 There is an Ophthalmic practice on Winchester Road, Four Marks
- 2.4 There is a dispensing chemist on Oak Green Parade, Winchester Road, Four Marks and a dispensary for those not living in Four Marks at the Watercress Surgery.
- 2.5 There are 2 Osteopaths practices in the villages
 - Barrett's Estate
 - Lymington Barnes, Lymington Bottom Road
- 2.6 There is a Chiropodist practice operating at the Boundaries Surgery
- 2.7 Alternative Therapies are provided in the locality:
 - Acupuncture on Lymington Bottom, Four Marks
 - Reiki on Telegraph Lane, Four Marks
 - Absolute Healthcare Providers on Winchester Road, Four Marks
- 2.8 Domiciliary health care
 - Absolute Healthcare Providers on Winchester Road, Four Marks
- 2.9 There are two Sports Physiotherapist practices advertising in the local

village magazines.

2.10 There are NHS and private Dentists available in Alton and New Alresford.

2.11 There are three general hospitals that serve the locality:

- Alton Community, Alton,
- Basing stoke and North Hampshire, Basingstoke
- The Royal Hampshire County Hospital, Winchester

2.12 There are two specialist facilities in the area

- Frimley Park Hospital, Frimley, Surrey
- Southampton General Hospital in Southampton

2.13 Mental Health Services are supported by Parklands, in Basingstoke.

2.14 Private hospital facilities are available in the area.

3. Other Services

3.1 Charities : The Cardiac Rehab charity in Alton

4. Access to Services

4.1 Surgeries.

4.1.1 There are two surgeries one located near Lymington Barnes, in Lymington Bottom Road in South Medstead and the other on Winchester Road in Four Marks.

4.1.2 Due to the catchment area for each surgery, local experience is that people going to the surgeries either drive themselves or are driven.

4.2 Dentistry

4.2.1 There is one private dentist on the industrial estate in 'South Medstead ' .

4.3 Hospitals

4.3.1 The Alton Community Hospital is easily accessed by bus; Winchester bus access is straight forward and easy, but attending Basingstoke by bus is difficult.

4.3.2 The other hospitals are specialist and located at Frimley Park Hospital and Southampton General Hospital, which cannot be easily accessed by public transport.

4.4 Emergency Ambulance service

4.4.1 We do not have data regarding service serving Medstead and Four Marks, but there are anecdotal concerns over response times.

4.5 Charities

4.5.1 The Cardiac Rehab charity in Alton can be easily accessed by bus or car.

4.5.2 Both villages have volunteer driving service to support villagers with lifts to surgery hospitals or collect prescriptions.

5. Growth in the services provided by the surgeries

5.1 The table below shows the growth in;

- Number of registered patients
- Number of GPs (Whole Time Equivalent) *
- Number of other medical staff
- Number of appointments

Mansfield Park Surgery

	GPs	GPs WTE*	Nurse practitioners	Nurses	Medical Staff	Appointments	Registered Patients
2104	6	3.63	0	2	5.63	25,263	7271
2015	6	3.94	0	2	5.94	28,944	7218
2016	6	4.03	0	2	6.03	32,639	7189
2017	6	4.34	0	2	6.34	38,118	7192
2018	6	4.13	1	2	7.13	42,275	7170
					127%	167%	99%

Boundaries Surgery

	GPs	GPs WTE*	Nurse practitioners	Nurses	Medical Staff	Appointments	Registered Patients
2104	Not available	2.25	0	1.1	3.35	Not available	3573
2015	Not available	2.25	0	1.1	3.35	Not available	3664
2016	Not available	2.25	0	1.1	3.35	Not available	3755
2017	Not available	2.25	0	1.6	3.85	Not available	3884
2018	Not available	2.25	0	1.6	3.85	14,445	3977
					115%		111%

Notes: As at 1st Sept each year.

*WTE refers to Whole Time Equivalent.

From the table it can be seen that

- i) the number of registered patients has not increased significantly (3%). This suggests that many of the residents from the new 628 houses have not yet registered with a local doctor.
- ii) The number of GPs (WTE) and total medical staff has increased from 2014 to 2018 by 27% and 11% respectively.
- iii) The total number of appointments, at Mansfield Park Surgery, has increased faster than the increase in staff resulting in the number of appointments per member of the medical staff increasing by 70%.

**MEDSTEAD & FOUR MARKS
NEIGHBOURHOOD PLAN REVIEW**



Utilities Review
August 2019



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Utility Review

1. Introduction

- 1.1 For the M&FMNP, the Neighbourhood Plan Steering Group reviewed the utilities that served the area.
- 1.2 For new developments, most utilities are available and as the provider is statutorily bound to provide the service for a development, there should be no problem in meeting the developers demand.
- 1.3 Utility companies cannot future proof their systems to allow for possible developments but will seek funding from the developers. It must be expected that more works to increase the capacity of the system, and subsequent disruption to residents, would follow any further large scale development in the villages.
- 1.4 Currently potable water, electricity and private drainage are available to both villages.
- 1.5 Some areas of the villages have natural gas, LPG , Oil and public drainage.
- 1.6 Most of the areas served by road are also served by land line telephones but the broad band service is mixed.
- 1.7 The Mobile telephone service across the area is mixed.
- 1.8 The disruption to villagers and travellers by new developments can cause some developments to become less sustainable.

2. Summary

- 2.1 **Mains drainage:** Mains drainage is available to the south of the Mid Hants Railway and to the new developments to the west and east of Lymington Bottom Road; north of Boyneswood Lane and to the east of Boyneswood Road. Thames Water plc advises that

“The proposed housing increases (as of 2014) for Medstead and Four Marks are not likely to necessitate an upgrade of the Sewage Treatment Works (STW) in the short term. However, depending on the scale of development in the next 15 years, an upgrade to the STW in the medium term may be required.”

- 2.2 **Potable water:** South East Water plc, have reported that their network in the local area is operating at or very close to its intended capacity across the whole local area.
- 2.3 **Electricity:** Most of the power lines in this rural area are overhead leaving the community vulnerable to power cuts

3. Potable Water

- 3.1 South East Water plc, the local Water Supply Authority, was consulted and reported to us that their network in the local area is operating at or very close to its intended capacity

across the whole local area, and the then configuration of the system comprises local service reservoirs at low elevations,

- 3.2 Some areas at higher elevations require a pumped supply to deliver adequate supply volume and pressure. As a result, over time there have been problems with the potable water supply manifested as water starvation and low pressure. Although SE Water had reinforced the system in the area to improve capacity pressures and resilience in the local region as a whole, they admitted that further work was unlikely in the short term remove all of the existing supply challenges experienced by local residents.
- 3.3 Historically it is known that there had been problems with the potable water supply manifested as water starvation and low water pressure.
- 3.4 SE Water was planning further improvements to the network during the period 2015-20 within which developer schemes and contributions were to be used.
- 3.5 In part the supply has suffered from outages particularly due to the loss of the electricity supply to the local pumping sets. However, the system has been made more resilient by using back-up power sources.
- 3.6 SE Water installed a new water main from the water towers at the Chawton Park woods End of Boyneswood Road, through Red Hill and Five Ash Road to connect with the main in Lymington Bottom Road.

4. Electricity

- 4.1 At the time of the M&FMNP, Scottish and Southern Electricity plc (SSE) stated that that the Medstead /Four Marks area had good supply capacity.
- 4.2 The villages are fed by five sets of overhead lines from the major substations around the area. Historically the community had experienced numerous supply interruptions and 'flicker' reflected on the line but SSE advised that the eastern and southern 11kV feeders into the villages were refurbished in the financial year 14/5 to reduce this risk.
- 4.4 However, in the last four years the delivery system has been subject to much better reliability with few outages and little flicker.

5. Private Drainage

- 5.1 Prior to the developments west of Lymington Barnes, East of Lymington Bottom Road, North of Boyneswood Lane and east of Boyneswood Road, dwellings within Medstead Parish are on private drainage systems, as are a number of properties in Four Marks, although there is mains drainage available for most of the properties south of the A31.
- 5.2 Some developments have their own sewage systems discharging waste water locally.

6. Natural Gas

- 6.1 From the information given by the gas network maintainer, the more densely populated areas of both Parishes are well supplied with an extensive gas network. However, the

more remote areas have no piped gas and need to rely on Liquid Petroleum Gas (LPG) or other fuels.

- 6.2 The new developments within the Settlement Policy boundaries are supplied by natural gas.

7. Liquid Petroleum Gas - LPG

7.1 LPG is supplied either from large gas bottles, which are replaced when empty, or from bulk storage tanks that are periodically refilled by tankers.

7.2 Although Natural Gas is available, it is noted that some properties inside the SPBs use LPG.

7.3 The more remote areas from the village centres have no piped gas and rely on Liquid Petroleum Gas (LPG) or other fuel.

8. Oil

8.1 Although Natural Gas is available, some properties both inside and outside the SPBs use light fuel oil for heating and some for cooking.

9. Mains Drainage

9.1 The majority of Four Marks is on Thames Water mains drainage for most of the properties south of the Mid Hants Railway Line.

9.2 Thames Water plc gave details to the M&FM NPSG as follows:

“The area to the North of the Neighbourhood Plan area, Medstead, is predominantly served by septic tanks. Large scale development in this area is likely to require a dedicated main from the village to be laid via requisition to the existing network. The closest location for a connection to the public sewer would be in the village of Four Marks, south of the railway. This may also facilitate existing properties north of the railway in connecting to the public sewerage system.

The existing drainage in Four Marks, however, is a small system made of mainly 150-225mm sewers and infrastructure improvements are likely to be required depending on the size of the developments.

The areas of Medstead and Four Marks are rural in nature and do not contain any public surface water sewers. It is likely that surface water in these areas drain to natural soakaways.

Our preference for development would be to the south of Four Marks this is because the current network drains south towards Hawthorn and this would mitigate the impact on the existing network. If development was located to the north of the area upgrades through the village are likely to be required.

There are two pumping stations in the village which pump flows forward from recent residential developments. Flows from Penrose Way, Drummond Close, and Kingswood Rise flow to Kingswood Rise Sewage Pumping Station (SPS) where it is pumped forward to the gravity system head on Winchester Road. This is also the case for flows from Goldcrest Way, Lapwing Way, Pheasant Close, and Chaffinch Road, which drain towards the pumping station on Chaffinch Road, and are then pumped forward to the same point on Winchester Road.

Foul sewage from Four Marks flows via gravity to the south of the town, where it flows through the network to the south east following the route of the Ropley Road, and then north, through Farringdon following the route of the A32. It then combines with flows from Alton, which are pumped forward to the Alton sewage treatment works from Newman Lane SPS. There is a capacity restriction at the receiving pumping station and infrastructure upgrades should be anticipated following from the network investigations.

The Alton Sewage Treatment Works (STW) covers the towns and villages of Alton, Four Marks, Farringdon, and Holybourne. The sewage works has a population equivalent (PE) of approximately 45,000. All flow is pumped from the mentioned Newman Lane SPS and also from the Holybourne and Caker Stream SPSs. We monitor the capacity and performance of the STW to ensure it meets its water quality consents set by the Environment Agency. The proposed housing increases for Medstead and Four Marks are not likely to necessitate an upgrade of the STW in the short term. However, depending on the scale of development in the next 15 years, an upgrade to the STW in the medium term may be required.

Like many areas in the South East, Alton's sewerage catchment area suffers from surface water ingress and high groundwater levels. Both these factors combined with a prolonged wet weather can impact on the capacity of our sewerage system, which in the past has led to periods of surcharging and overflow from our sewers. There is a variable spare network capacity and investigations into impact from the proposed developments will be required and upgrades to the network should be anticipated. The exact location and scale of the upgrades will be determined in liaison with developers; once certainty of development location size and phasing are known."

9.3 In terms of planning the necessary infrastructure to meet the needs of future demand, Thames Water commented as follows:

"As part of our five year business plan Thames Water advise OFWAT on the funding required to accommodate growth at all our sewage/wastewater treatment works. As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of

the community as set out in the National Planning Policy Framework (paragraph 162) and the National Planning Practice Guidance.

It is unclear, at this stage, what the net increase in demand on our infrastructure will be as a result of development facilitated by the Neighbourhood Plan. Upgrades may be required and their scale, location and time to deliver will be determined after receiving a clearer picture of where development is to be located and phased. Thames Water welcomes the opportunity to work closely with yourselves as your plan evolves to identify the net increase in wastewater demand on our infrastructure."

10. Telecommunications

10.1 The telecommunications systems in the area include landlines, for voice and data, and mobile phones.

10.1.1 Landline

10.1.1.1 The land line communication to the area is distributed from the telephone exchanged situated at the northern end of the Lymington Bottom Road adjacent to just within the 'South Medstead' SPB.

10.1.1.2 While a copper system runs throughout the area, BT Openreach has run a fibre system to discrete cabinets, mainly in Four Marks and in Medstead Village, but not to the outlying areas of the Parishes. The final feed to the end user is by copper.

10.1.1.3 The resultant Broad band service supplied by multiple suppliers is mixed and particularly for High Speed Broad band often poor, which can disrupt business users, depending on their location.

10.1.2 Mobile Services

10.1.2.1 The area is served by multiple mobile service providers, using various masts across the locality.

10.1.2.2 The service is variable in quality and intermittent in signal strength due both to the topography of the area and weather conditions. As a result the service is frequently poor and unreliable.

11. The Effect of Development works on the Community

11.1 All utilities are obliged to support developers' projects and this has often caused significant disruption to local residents.

11.2 The residents of the area have endured the works carried out by the utility providers and their contractors providing new services to the new developments, especially the seven new sites developed in the last ten years.

11.3 Major disruption to residents and through traffic flow has been caused when Lymington Bottom Road and Boyneswood Road have been closed for the works as these roads are important feeder roads and crossing points on the A31 Winchester Road.

- **Road Closure and significant diversions:**

55197/001 Land East of, 20 - 38 Lymington Bottom Road; 53305/ 004, 005 & 006 Lymington Farm Industrial Estate, Land to the West of Lymington Bottom Road. Lymington Bottom Road & 25256/032 Friars Oak Farm, Land at Boyneswood Road - Boyneswood Road, Red Hill and Five Ash Road

Water Utility carrying out works at one end of the road at same time as electricity and drainage utilities attempted to make connection to the development at the other end of Boyneswood Road.

This almost led to a section of the village being inaccessible by motor vehicle. Fortunately Hampshire Highways and EHDC intervened to prevent the farcical situation created by too much unplanned development within one area. However, due to the restricted options available on the local road network at that point and the limited alternative road access within the area, these works took an extended time to complete.

The residents of both villages, particularly those living in the Boyneswood Road/ Red Hill area, experienced disruption for many months. This work also impacted on the through routes in the village with diversions via the A31 Winchester Road and Lymington Bottom Road.

- **Road Closure and significant diversions:**

53305/ 004, 005 & 006 Lymington Farm Industrial Estate, Land to the West of Lymington Bottom Road. Lymington Bottom Road

Road closure at Lymington Bottom Road Bridge to allow for foul water service connection to the main sewer for the developments.

This work also impacted on the through routes in the village with diversions via the A31 Winchester Road and Boyneswood Road.

- **Road Closure and significant diversions:**

25256/032 Friars Oak Farm, Land at Boyneswood Road

Road closure to allow for installation of planned new supply from the Substation at the Telegraph Lane/ Blackberry Lane junction to the new development off Boyneswood Road and connection of foul sewer.

This entailed major works across the single access road bridge across the Mid Hants Railway, three way traffic lights on the A31, Boyneswood Road/ Winchester Road junction and similarly at the Telegraph Lane/ Winchester Road Junction, and the relocation of bus stops on the 64 Alton to Winchester route.

The electrical work was carried out whilst Hampshire Highways were carrying out nighttime resurfacing of Winchester Road from Telegraph Lane to the crossroad at

Lymington Bottom. The ensuing disruption and delays to residents trying to travel north south east and west at one of the major route intersections and be diverted, together with the additional delay problems caused to through traffic was immense.

- **Road Closures and Diversion:**

52501/001 Reserve Housing Allocation, Brislands Lane, Four Marks, Alton

Road closure to allow for connection of foul sewer, installation of planned new supply from the Substation at the Lymington Bottom Road/ Blackberry Lane junction to the new development off Brislands Lane and highway works to the Brislands Lane/ Blackberry Lane junction with Lymington Bottom, and installation of a footway in Brislands Lane footway .

This entailed the closure of Brislands Lane for major works to make the foul sewer connection and installation of the new footway, causing disruption to the Four Marks Primary School run, as Brislands Lane gives access to Gradwell Lane which has the primary school adjacent to the other end of the lane at Five Ways.

The Brislands Lane/ Blackberry Lane junction with Lymington Bottom was remodeled as part of the works. These proved unsatisfactory; as vehicles leaving Brislands Lane had their vision obscured with regard to vehicles approaching the junction from the south. The junction had to be remodeled, causing further disruption. The resultant works have not fully resolved the issue.

A year after the initial works SSE again opened the road to run the electrical feed to the site; which was followed this year by SSE work during August associated with the removal of a redundant overhead line, originally passing across the site.

- **Disruption to Byway Open to All Traffic:** 55258/004 Land North of Boyneswood Lane

Disruption to private road and closure of byways.

Station Approach, Medstead, Stoney Lane and Boyneswood Lane.

Foul water and electricity utilities routed to site under the private road and the narrow BOATS, Stoney Lane and Boyneswood Lane.

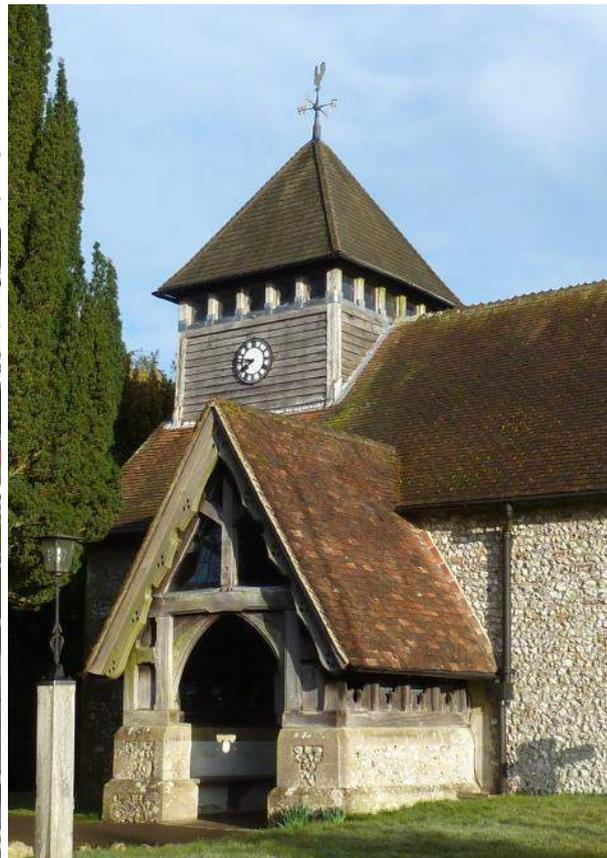
The ownership of the byways is unknown.

At completion the standard of finish to the lanes surface left by the contractors was poor, although they were not the last utility contractor to work on the lanes. The final surface finish is substandard leading to outcry from the residents who have been left with a degraded facility

12. Conclusions

- 12.1 It is recognised that it is the statutory obligation of the utility companies to supply the utilities to the new development. However, none of the promoters could give any indication from discussions with the utility companies about the scale of investment required or the timescale of implementation. There is also no information available on the impact that the provision of new services to the new dwellings will have on existing residents.
- 12.2 Additional services of landline telephone, Broadband or mobile phone connections are at the supplier's commercial discretion. Telecommunications may be arranged by the developer, so whilst the provision can be agreed between the supplier and developer it may lag behind the progress made by the developer and will result in significant disruption to local residents and others using the roads through the area.
- 12.3 Currently potable water, electricity and private drainage are available to both villages.
- 12.4 Some areas of the villages use natural gas, LPG , Oil and public drainage.
- 12.5 Most of the area, served by road, is also served by land line telephones but the quality of the broad band service is mixed. Currently fibre broadband has not been extended across the more rural parts of Medstead.
- 12.6 The quality of the Mobile telephone service across the area is mixed, and, at worst very poor.

**MEDSTEAD & FOUR MARKS
NEIGHBOURHOOD PLAN REVIEW**



**Review of the impact of the Large Site proposals
on the local traffic
October 2019**



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Review of the impact of the Large Site proposals on the local traffic

1. Introduction

This review has been written in the light of the EHDC Large Sites consultation.

Four large sites have been proposed in the designated area of the M&FMNP and this report draws on the promoters information and background work on the EHDC website Large Development Site Consultation²⁷.

2. Summary

The NPSG believe that the quantity of traffic in the designated area is already a problem.

The A31 trunk road is frequently congested during the peak hours and there are significant queues at the major pinch points.

The allocation of any Large Site of 600+ will only increase the pressure on the existing infrastructure

The promoters, in presenting their proposals, have shown little understanding of the problems; have failed to quantify the impact that their proposals will have on the existing infrastructure; and have not presented any ideas about how this impact might be mitigated.

The NPSG have carried their own calculations which indicate that the impact of the any of the sites on the local traffic would be significant. The NPSG are of the opinion that there may be no viable solution to some of the impacts. But the NPSG recognise that they are not experts and cannot present a professional quantification of the impact.

The NPSG therefore suggest that a full and professional mathematical modelling of the traffic flows from these proposed sites be carried out prior to any allocations being decided.

Before the appropriate robust, professional assessment is carried out, none of these sites can be considered deliverable.

3. Public Transport

In their brochures none of the promoters have recommended any increase in the quantum of public transport to meet the needs of the additional residents, although the promoter of the Land to the South of Winchester Road did suggest creating lay bys on the A31 to allow the bus to stop.

²⁷EHDC Large Development Site Consultation <https://www.easthants.gov.uk/large-development-sites-consultation>

4. Current pinch points for Traffic Flow

- 4.1 The A31 runs through the middle of the settlement. This is a significant trunk road. This road already becomes congested at peak hours
- 4.2 The other major pinch points for traffic are:
- Onto the A31 at Telegraph Lane
 - Onto the A31 at Boyneswood Road
 - Onto the A31 at Lymington Bottom Road
 - Onto the A31 at Lymington Bottom
 - Under the railway Bridge on Lymington Bottom Road
 - Over the railway bridge at Boyneswood Road

5. The Large Site proposals

It is clear that any development of 600+ houses would put additional pressure on the A31 and these pinch points.

In their documentation issued for the EHDC Large Site Consultation²⁸, the promoters have put forward the following recommendations to address these issues:

Road improvements	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Promoters' Mitigation	Funding for: <i>"Four Marks: Provision of crossing points on the A31. Phasing – Short to Medium Term. Cost – Not Known. Funding Sources – Developer Funding. Funding Gap – Not Known."</i> ; and: <i>"Four Marks: A31 / Lymington Bottom Junction Improvements. Phasing – Short Term. Cost – Not Known. Funding Sources – Developer Funding. Funding Gap – Not Known."</i>	Reflecting local aspirations, new development at Four Marks, may also enable improvements to the highway network and existing pedestrian and cycle routes. Measures to either improve highway capacity or highway safety would be investigated with the local community and the highway authority.	None.	None.

²⁸ EHDC Large Development Site Consultation <https://www.easthants.gov.uk/large-development-sites-consultation>

Four Marks South: The promoter notes in the brochure:

“Two highway improvement schemes to the A31 in the village have been identified, both of which require developer funding but neither of which are being funded at present. The scale of development proposed at Four Marks South could provide the level of funding required for these improvements and could deliver them early in the plan period.”

Nothing has been proposed to mitigate the impact at the Lymington Bottom and Telegraph Lane Junctions with the A31, the junctions where residents of the proposed development will join the A31.

South of Winchester Road: The Promoter offers no immediate mitigation in the brochure, other than

“Measures to either improve highway capacity or highway safety would be investigated with the local community and the highway authority.”

West of Lymington Bottom Road: The Promoter offers no mitigation in the brochure.

South Medstead: The Promoter offers no mitigation in the brochure.

As can be seen from above, none of the promoters have addressed the potentially serious problems that will arise from the additional traffic which will be generated by each site, especially the increased flow on the A31.

5.2 Access Points

The access points described by the promoters in their promotional material for each of the sites are included in the table below and shown on the brochure diagrams, reproduced in the Appendix 1.

Traffic	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Access points	7 -2 Blackberry Lane, 4 Alton Lane and 1 Telegraph Lane	3 -1 Winchester Road by Travel Lodge, 1 A31 by Grosvenor Road & 1 A31 by Gravel Lane	4 off Lymington Bottom Road	11 -1 Beechlands Road, 1 Boyneswood Lane (not a made road), 3 Stoney Lane (not a made road), 2 Five Ash Road, 1 Soldridge Road, 2 Lymington Bottom Road

6. The view of the NPSG

The NPSG consider this to be a wholly inadequate response to a serious problem. The NPSG were not expecting finalised plans, but they were expecting

- A recognition of the scale of the problem and the potential impact on the local community
- Some initial ideas as to how the problems could be avoided or at least reduced.

In the absence of any data from the promoters, the NPSG have had to carry out their own assessment of the impact of these proposals on the local traffic. In doing so the NPSG recognise that they are not experts. We have no professional qualifications in traffic management. However, we felt that it was important to make some empirical assessment of the scale of the impact, before suggesting that it should become a material consideration for EHDC. In carrying out our calculations, we have relied on documents in the public domain such as the principles included in Planning Statement for the *Planning Application 25256/045 | Outline application - Development of up to 58 Dwellings, Land at Friars Oak Farm, Boyneswood Road, Medstead, Alton*²⁹ and on the Officer Report - 53305/017 | Variation of Condition 5 of 53305/004 to allow substitution of plan MLR/E4330/SK/001/C for MLR/E4330/SK/001 F - change of priority on access road (as amended by plan and additional information received 28 May 2019) | Land to the West of Lymington Farm Industrial Estate, Lymington Bottom Road, Four Marks, Alton.

²⁹Planning Statement Para 6.73 - 25256/045 | Outline application - Development of up to 58 Dwellings (including up to 23 Affordable Homes) with Access to be determined, including associated Garages, Car parking, Infrastructure, Open Space, landscaping and potential dedication of land for community use (Access only to be considered) (Amended site address and planning ref. no.) | Land at Friars Oak Farm, Boyneswood Road, Medstead, Alton 46 additional vehicle am and 38 additional vehicle pm peak hour period
https://planningpublicaccess.easthants.gov.uk/online-applications/files/AF0E2EB03658ADB75D1B331877AA2FFB/pdf/25256_045-MEDSTEAD_PHASE_2_PLANNING_STATEMENT_FINAL-786730.pdf

6.1 Impact on the A31

Our calculations confirm that the impact of any Large Site Development on the A31 would be significant. See table below.

For the Morning peak

Transport	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Houses	800	600 / 700	650	600
Number of cars at peak hour a.m.³⁰	634	476 / 555	516	476
Additional Cars/ Minute a.m.	11	8 / 9	9	8
Current amount of traffic a.m. Winchester Road³¹	1,464	1,464	1,464	1,464
Total Traffic A.M Winchester Road	2,098	1,940 / 2,019	1,980	1,940

³⁰ 25256/045 | Outline application - Development of up to 58 Dwellings (including up to 23 Affordable Homes) with Access to be determined, including associated Garages, Car parking, Infrastructure, OpenSpace, landscaping and potential dedication of land for community use (Access only to be considered) (Amended site address and planning ref. no.) | Land at Friars Oak Farm, Boyneswood Road, Medstead, Alton William Lacy Group Proof of Evidence Re Highway Matters by Ian Roberts, MCIHT, Appendix 3

https://planningpublicaccess.easthants.gov.uk/online-applications/files/A6199B8BB2A115B3221DBA35CB54A74E/pdf/25256_045-HIGHWAYS_PROOF_AND_APPENDICES_19.06.11-GDB-5271-POE.4-864501.pdf

³¹ 25256/045 | Outline application - Development of up to 58 Dwellings (including up to 23 Affordable Homes) William Lacy Group Proof of Evidence Re Highway Matters by Ian Roberts, MCIHT, Appendix 3 - Sum of Vehicles , travelling East & West A31 , 8.15 to 8.45 a.m.

For the Afternoon peak

Transport	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Houses	800	600 / 700	650	600
Number of cars at peak hour p.m. ³²	524	393 / 459	426	393
Additional Cars/ Minute p.m.	9	7 / 8	7	7
Current amount of traffic p.m. Winchester Road	1,468	1,468	1,468	1,468
Future amount of traffic	1,992	1,861 / 1,927	1,894	1,861
Percentage Increase	35.69%	26.77% / 31.27%	29.02%	26.77%

This table demonstrates that that if any of these sites are developed, this major trunk road will become significantly more congested. The road is already close to capacity at peak times and Hampshire Highways predict a 4% increase in traffic pa without the developments. There is clearly a risk of regular traffic jams on an important trunk road.

6.2 The impact on the 'pinch points'.

6.2.1 All Pinch points

The analysis carried out by the NPSG clearly indicates that significant issues would arise at the following junctions with the A31

- Telegraph Lane
- Lymington Bottom Road
- Lymington Bottom
- Boyneswood Road.

In addition, the NPSG make the specific comments with regard to the critical role that the railway bridges play in determining the flow of traffic in and through the settlement.

³² 25256/045 | Outline application - Development of up to 58 Dwellings (including up to 23 Affordable Homes) William Lacy Group Proof of Evidence Re Highway Matters by Ian Roberts, MCIHT, Appendix 9 - Extended figures- Sum of Vehicles , travelling East & West A31, https://planningpublicaccess.easthants.gov.uk/online-applications/files/A6199B8BB2A115B3221DBA35CB54A74E/pdf/25256_045-HIGHWAYS_PROOF_AND_APPENDICES_19.06.11-GDB-5271-POE.4-864501.pdf

6.2.2 **South Medstead** - Boyneswood Road/A31

The junction of Boyneswood Road with the A31 is already over capacity. In the recent appeal (Appeal Ref: APP/M1710/W/19/3225766 Land at Friars Oak Farm, Boyneswood Road, Medstead) the inspector stated that : *"I say that because the second column in Table 2 in that proof [i.e. paragraphs 5.2 to 5.4 of Mr Roberts proof of evidence] shows that with the exclusion of the existing traffic from the Bellway development the Boyneswood Road arm of the junction is already operating with an RFC of 0.94, i.e. beyond its design capacity and very close to its theoretical capacity. That suggests that when the traffic arising only from the Bellway development is allowed for the junction is already in need of being improved."*

Any additional traffic from the 600 homes at the South Medstead development would only put a further burden on this junction.

6.2.3 **South Medstead** – Boyneswood Road Railway Bridge

There is a bridge across the railway which is limited to single file. There is a clear risk that at peak hours some traffic could 'back up' here and form a queue to get off the A31.

The promoter has given no indication as to whether there is a viable solution to this problem.

6.2.4 **Land West of Lymington Bottom Road** – Lymington Bottom Road Railway Bridge

There is single file traffic under this railway bridge. Currently, at peak hours there are queues of cars waiting to pass under the railway bridge. Any additional traffic from the West of Lymington Bottom Road development would increase the number of cars waiting to pass under the bridge.

The promoter has presented no assessment of the scale or impact of his proposals on the increase in traffic at this pinch point.

The NPSG have been made aware that the idea of installing traffic lights has been floated as a possible solution. Again, the NPSG have made an amateur attempt to calculate the impact that the installation of traffic lights would have on queuing times. The NPSG have based their analysis on the approach taken in the Summary Proof of Evidence Re Highway Matters by Ian T Roberts, MCIHT to the appeal on the Land at Friars Oak Farm Boyneswood Road, Medstead, Alton. This analysis suggests that the number of cars in the queue to get through the traffic lights at peak hours could be very significant.

7 **Air Pollution**

The NPSG are not qualified to express a professional opinion on the impact that this traffic will have on air pollution. In particular, it would need a qualified expert to determine the level of air pollution that is generated by cars that are sitting in a queue.

However, the NPSG have been able to compile the table below based on publicly available data. This shows that each of the sites within the designated area of the M&FMNP would result in a significant increase in air pollution.

	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Morning Peak				
No of Vehicles	634	476/ 555	516	476
CO₂/ vehicle/km gm	120	120	120	120
NOX/ vehicle/km gm	0.07	0.07	0.07	0.07
CO₂ Generated kg	76.08	66.60	61.92	57.12
NOX Generated kg	0.0444	0.0333 / 0.0389	0.0361	0.0333
Increase in Pollution	39.63%	29.75%/ 34.69%	32.25%	29.75%
Afternoon Peak				
No of Vehicles	524	393 / 459	426	393
CO₂/ vehicle/km	120	120	120	120
NOX/ vehicle/km	0.07	0.07	0.07	0.07
CO₂ Generated kg	62.88	55.08	51.12	47.16
NOX Generated kg	0.0367	0.0275 / 0.0321	0.0298	0.0275

Furthermore, much of this is unnecessary. With the climate change crisis, the NPSG suggest that EHDC should not be choosing any site which is restricted by single file traffic crossing a railway as it is bound to produce an unnecessary amount of air pollution from the queuing traffic. The solution to this problem would be to choose a site within EHDC where the impact of any increased traffic resulted in the lowest level of air pollution.

8 Conclusion

The NPSG believe that the risk of gridlock on the local roads is sufficiently real that it is essential that a professional mathematical modelling of the impact of the increased traffic on the A31 and the local pinch points should be carried out before any of these sites are allocated.

It is clear that the scale of the impact will be significant and, as there has been no evidence to the contrary submitted by the promoters, there can be no confidence that the problems are solvable.

There is an urgent need for this detailed report carried out by a qualified expert, e.g. Hampshire Highways. Without it, none of these proposals can be considered deliverable.

Appendix 1

Site Access

The Brochures published on the EHDC website³³, the site promoters indicate 'illustrative' site layouts with access points:



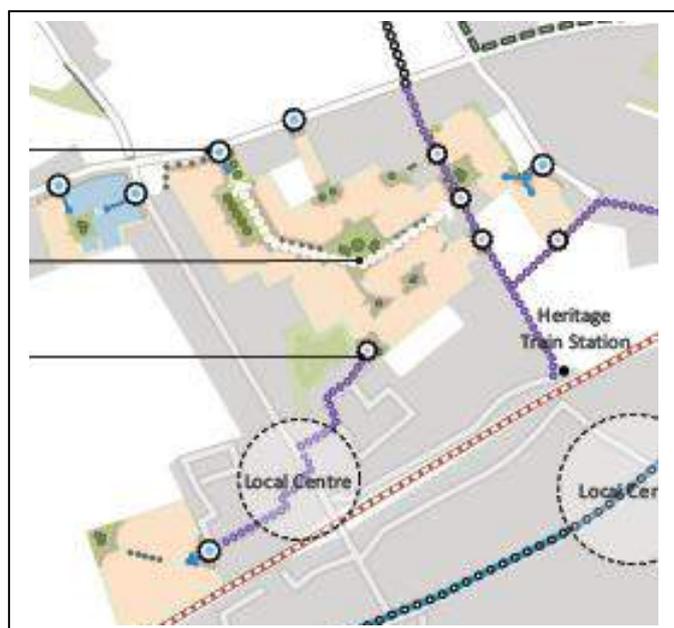
Four Marks South, Four Marks



Land South of Winchester Road, Four Marks



Land west of Lymington Bottom Road



South Medstead

³³ EHDC Information by site –Large Development site Consultation, Individual Site Information Pack www.easthants.gov.uk/large-development-sites-consultation

Appendix 2

Emissions

Carbon Dioxide

From the Belgian Ecoscore website ³⁴, diesel and petrol vehicles create different levels of CO₂ for a Euroscore 6 engine, the most efficient power unit:

Diesel:

An average consumption of 5 litres/100 km then corresponds to 5 l x 2640 g/l / 100 (per km) = 132 g CO₂/km.

Petrol:

An average consumption of 5 litres/100 km then corresponds to 5 l x 2392 g/l / 100 (per km) = 120 g CO₂/km.

Thus using the morning and evening peak traffic volumes, the vehicles currently generate, as a minimum, around 576.0kg and 545.76kg of CO₂, per hour driving through the village.

Nitrogen Oxides

Similarly vehicles generate NOX at a legal rate of 0.06gm/km for petrol and 0.08 for diesel vehicles³⁵.

³⁴ Ecoscore website - <http://ecoscore.be/en/info/ecoscore/co2>

³⁵ European emission standards - https://en.wikipedia.org/wiki/European_emission_standards

Medstead and Four Marks Neighbourhood Plan

October 2019

Dear Ms Potts,

East Hampshire District Council have launched a consultation on 10 large scale development sites and requested views from interested parties as to which should be included in the Draft Local Plan.

The views of the Neighbourhood Plan Steering Group (NPSG) of the Medstead and Four Marks Neighbourhood Plan (M&FMNP) are included in the documents attached. We believe that it makes the case that EHDC should NOT to proceed with any of the 4 sites in the designated area of the M&FMNP. We are therefore writing to **OBJECT** to each of these 4 sites:

- **Four Marks South**
- **Land West of Lymington Bottom Road**
- **South Medstead**
- **Land South of Winchester Road**

In selecting the most appropriate site, we believe that EHDC should be guided by the following key strategic principles:

- i) **Integrated Community** : the preferred sites should be the ones that impose the least burden on existing infrastructure
- ii) **Social Cohesion**: the preferred sites should be close to areas of substantial employment. Long distance commuting to work undermines social cohesion
- iii) **Climate change**: the preferred sites should be close to a railway station/ public transport, thereby reducing the number of cars on the road. Where travel by road is necessary, the preferred sites should be ones with the least amount of queuing traffic. This will reduce CO₂ emissions and have the least impact on Climate Change.
- iv) **Affordable Housing**: in the East Hampshire district there is a shortage of 'affordable housing'. The sites selected should be those located closest to where that need for 'affordable housing' exists.
- v) **Neighbourhood Plans**: the decision of local communities as expressed through referenda on Neighbourhood Plans should be respected. No site should be selected which conflicts with any such adopted plan.
- vi) **Sustainable Development**: the selected sites should be those that can demonstrate that they meet the criteria for 'sustainable development' as stated in the NPPF

We hope that these comments are helpful.

Yours sincerely

██████████

Chairman of the NPSG of the M&FMNP.

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**MEDSTEAD AND FOUR MARKS
NEIGHBOURHOOD PLAN
EHDC CONSULTATION ON 10 LARGE SITES**



**Representations from the Steering Group
Medstead and Four Marks Neighbourhood Plan
October 2019**



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REPRESENTATIONS FROM THE STEERING GROUP OF THE MEDSTEAD AND FOUR MARKS NEIGHBOURHOOD PLAN

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REPRESENTATIONS FROM THE STEERING GROUP OF THE MEDSTEAD AND FOUR MARKS NEIGHBOURHOOD PLAN

These are the views of the Neighbourhood Plan Steering Group (NPSG) of the Medstead and Four Marks Neighbourhood Plan (M&FMNP), in response to the information made available to us on the 10 'Large Development Sites' for the EHDC Local Plan. Our comments refer mainly to the 4 sites that fall within the 'designated area' of the M&FMNP, (Four Marks South; West of Lymington Bottom Rd; South Medstead; and Land South of Winchester Rd, Four Marks).

1. These proposals conflict with the Statutory Development Plan

The M&FMNP was adopted in May 2016. The M&FMNP is part of the Statutory Development Plan. These proposals conflict policies in the M&FMNP, particularly Policy 1. See Summary 1.

2. These proposals undermine local democracy

The M&FMNP was approved at a Referendum. There was turnout of 41% and of those who voted, 93% voted in favour. It is the expectation of the local electorate that their Plan is honoured until 2028. See Summary 2.

3. The scale and speed of recent unplanned housing development in this settlement cannot be considered 'sustainable development.'

- 3.1 The local infrastructure has failed to keep pace with the scale and speed of recent unplanned housing development in this settlement. The EHDC JCS set a minimum target for Four Marks/'South Medstead' of 175 dwellings by 2028. By 2019 the number of dwellings built and approved is 625+. See Summary 3.
- 3.2 Several Planning Inspectors have already concluded that the current level of development is threatening sustainability. See Summary 4.
- 3.3 EHDC in their evidence base (LAA and the AECOM report) have already concluded that these sites are not sustainable. See Summary 5.

4. None of these 4 proposals contain the necessary infrastructure to be considered 'sustainable development' as defined by the NPPF.

None of these 4 proposals meet the criteria for 'sustainable development' laid out in the NPPF. See Summary 6.

5. None of these 4 proposals add sufficient infrastructure to meet the needs of the new residents.

These developments will put further pressure on the current infrastructure, which already falls short of the needs of the community. See Summary 7.

6. Comments on individual proposals based on local knowledge.

See Summary 8.

7. There is insufficient detailed evidence provided on any of these 4 sites for them to be considered 'deliverable'.

See Appendix 1.

These proposals conflict with the Statutory Development Plan

The Medstead and Four Marks Neighbourhood Plan 2015-2028 (M&FMNP) was adopted in May 2016. These proposals for these 4 sites conflict with Policy 1 of the M&FMNP. This point was made by the NPSG in the submission to the Planning Inspectorate dated 9 May, 2019 in the case of the appeal in relation to Friars Oak, Medstead (see Core Document 1)

We are confident that our Neighbourhood Plan is 'up to date'. This was confirmed by the Inspector in the recent appeal on Land rear of 27 Blackberry Lane, Four Marks, in the appeal report dated 4 July 2019.

The Neighbourhood Plan is therefore a fundamental part of the current Statutory Development Plan.

The NPPF states that "*Planning law requires that applications for planning permission be determined in accordance with the development plan*"¹. In the NPPF document, the following statement is referenced in footnote 2²:

"This includes local and neighbourhood plans that have been brought into force and any spatial development strategies produced by combined authorities or elected Mayors"

The NPPF further states that:

*'The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted'*³

This is supported by the case of Barwood and East Stafford (30/06/2017)⁴, in which the Court of Appeal confirmed that the presumption in favour of the development plan took precedence over the presumption in favour of sustainable development.

The recent PPG (9/05/2019)⁵ states that

"A neighbourhood plan must set out the period for which it is to have effect (section 38B (1) (a) of the Planning and Compulsory Purchase Act 2004). Neighbourhood plan policies remain in force until the plan policy is replaced."

In summary, the NPSG believe that, as each of these four proposals fall within the designated area of the Neighbourhood Plan and, as the Neighbourhood Plan policies remain in force until the plan policy is replaced, these proposals should never have been allowed to come forward as part of this process. They clearly conflict with the Neighbourhood Plan policy.

¹ NPPF 2019 para 2, p.4

² NPPF 2019 footnote 2 to para 2, p.4

³ NPPF 2019 para 12, p.7

⁴ Barwood Strategic Land II LLP, Appellant, and 1) East Staffordshire Borough Council (2) Secretary of State for Communities and Local Government, Respondents, 25 May 2017.
<https://www.bailii.org/ew/cases/EWCA/Civ/2017/893.html>

⁵ Ministry of Housing, Communities & Local Govt. Planning Practice Guidance on Neighbourhood Planning, last updated 9/5/2019 <https://www.gov.uk/guidance/neighbourhood-planning-2>

These proposals undermine local democracy
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The M&FMNP was approved at a Referendum. There was turnout of 41% and of those who voted, 93% voted in favour. The local community strongly believe that this overwhelming endorsement should ensure that their Plan is honoured as adopted.

The Neighbourhood Plan was subjected to the full statutory process laid out in the Localism Act. The process included extensive consultation within the community on the Draft Plan; a formal Submission Plan; an Examination by a Planning Inspector; and a Referendum at which there was a turnout of 41% of whom over 93% voted in favour. The Plan was then 'made' in May 2016 and is now part of the statutory development plan.

The M&FMNP was produced by lay volunteers from both villages, supported by our community. They gave willingly of their time with little or no knowledge of the intricacies and some of the more arcane processes of the planning system. As the NPSG had no understanding of Neighbourhood Planning law nor the mechanism for producing a Plan, it took two year's work before the Plan was adopted. However, the team were happy to invest their time in the confident belief that the adopted Plan would represent the needs and aspirations of the local community for the next 15 years.

The Neighbourhood Planning process was set up by the Localism Act of 2011. If the legislation had intended that the Plan would only carry weight in the planning process for 3 years it is reasonable to assume that:

- It would have said so
- There would be clear guidance in the PPG that this was the case
- No one from the local community would have spent two years working on a Plan that was only valid for 3 years.

In the appeal 'Land to the east of Seagrave Road, Sileby, Leicestershire'⁶, the Planning Inspector stated that

"the NPPF, however, reaffirms the importance of a plan-led system. That relies on plans having a reasonable shelf-life (the Housing White Paper advocates five years). To so quickly cast aside the recent Core Strategy housing requirement would corrosively undermine the value, confidence and importance of a plan-led system."

In summary, the NPSG believe that the decision of the local electorate should be honoured. In order to respect the democratic wishes of the local community, the NPSG recommend that none of these 4 proposals are considered for implementation prior to 2028.

⁶ APP/X2410/W/16/3152082 Land to the east of Seagrave Road, Sileby, Leicestershire, David Spencer, para 25. Decision date: 27 March 2017, <https://www.richboroughstates.co.uk/live/appeals/2204a.pdf>

The scale and speed of recent unplanned housing development in this settlement cannot be considered 'sustainable development.'

The current Local Plan – the JCS – was adopted by EHDC in June 2014. In that Plan, the settlement of Four Marks/'South Medstead' was identified as a Small Service Centre which was required to provide a minimum number of 175 houses in our area by 2028.

Already by 2019, the comparable figure for delivery is over 625. That is an annual rate that is 10 times the rate included in the Plan. (See Core Document 2)

The unplanned nature of these developments means that they cannot be considered to be 'sustainable development'. This is because the statutory bodies that are required to supply services to our community would quite reasonably make their Plans based on around 175 new dwellings. It is not surprising that they have failed to provide the necessary infrastructure when the current delivery is over 540. Our schools are a good example of this. The local authority has announced an expansion of Four Marks School, but that will only meet the requirements of the additional 175 dwellings.

The JCS explicitly stated that the figure of 175 was 'a minimum' and therefore a figure greater than that could still be sustainable. The question is 'how much greater?'. It is argued there has to be a ceiling above which the Plan would become unsustainable. Guidance on this matter can be found in the Appeal on *Land to the east of Seagrave Road, Sileby, Leicestershire*⁷. In the opinion of the Planning Inspector in this case (David Spencer), exceeding the 'floor' figure by more than 33% would be excessive.

In Four Marks/ 'South Medstead' the 'floor' figure has already been exceeded by 300%.

The NPSG have reviewed the impact of the speed and scale of this unplanned development on the local infrastructure. The review was carried out under a number of headings. The papers that were submitted to the NPSG can be viewed in the Core Documents (CD) appendix. In summary, the key conclusions arrived at by the NPSG are as follows:

1. Employment (CD 4): There are insufficient employment opportunities within the settlement. As a result, most of those in employment already commute to jobs elsewhere.
2. Transport (CD 5): As there is inadequate public transport, most of those who commute out of the villages do so by car.

The current level of traffic from the new developments is already causing problems. These problems are particularly acute in terms of access onto the A31 and the passageways over or under the railway line. The waiting times for cars in these locations is leading to an increase in queuing times and creating an additional amount of air pollution in terms of both NOX and CO₂.

⁷ APP/X2410/W/16/3152082 Land to the east of Seagrave Road, Sileby, Leicestershire David Spencer, para 39. Decision date: 27 March 2017, - <https://www.richboroughstates.co.uk/live/appeals/2204a.pdf>

3. Schools (CD 6): The current primary schools are full. The planned expansion to Four Marks primary school will not be completed until 2020. This is unlikely to meet the needs of the additional 625+ dwellings already committed. There are no secondary schools in the settlement.
5. Medical facilities (CD 7): The surgeries have increased the number of appointments available but this has been necessary to meet the needs of the existing residents. Many of the new residents from the 625+ new houses have not yet registered as patients.
6. Utilities (CD 8): The utility companies are statutorily required to meet the needs of the community. But the speed of the unplanned housing development has left some of them lagging behind.

None of the promoters could give any indication from discussions with the utility companies about the scale of investment required or the timescale of implementation.

In summary, the NPSG believe the scale and speed of recent development in this settlement can already be described as 'unsustainable'. Any new large scale development would, at least, have to provide **all** the necessary infrastructure to meet the needs of the new residents. Ideally, it would provide additional infrastructure to meet the needs of existing residents.

Several Planning Inspectors have already concluded that the current level of development is threatening sustainability.

There are a number of examples where Inspectors have clearly indicated that the speed and scale of delivery of new homes in this settlement, when compared with the minimum target contained in the JCS, is excessive and could undermine sustainability. The details are given in Core Document 1. They are summarised below.

- The Examination of the EHDC Local Plan: Housing and Employment Allocations.

*“Indeed, any significant further increase could begin to conflict with the JCS in terms of the scale and distribution of development between the settlements.”*⁸
- The Examination of the Medstead and Four Marks Neighbourhood Plan

*“There are concerns that additional housing is not being supported by the provision of additional employment – resulting in unsustainable patterns of movement; and that investment in local infrastructure, including services and facilities, has failed to keep pace with housing growth”*⁹
- The Appeal in the case of The Haven, Dinas and Merrow Down, Land west of Boyneswood Road, Medstead, Alton, Hampshire GU34 5DY¹⁰

“Given that there already permissions in place to take new housing well beyond the identified figure, the resulting implications for local infrastructure weighs against the sustainability credentials of the proposal.”
- The Appeal in the case of Land to the North of The Telephone Exchange, Lymington Bottom Road, Medstead, Hampshire GU34 5EP¹¹

“The small level of services that are within the village are under significant pressure given the size of the settlement and the pace of increase at this point in time. This adds to the pressure on services and facilities including in terms of public open space, community facilities and education.”
- The Appeal in the case of Land to the rear of 131 Winchester Road, Four Marks,¹²

“I am also conscious of the relevant parts of the Framework which set out that planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area... ...The Council have clearly demonstrated that this approach underpins their plan-making and decision-taking.”

⁸ EHDC Local Plan: Housing and Employment Allocations, 15 February 2016

https://www.easthants.gov.uk/sites/default/files/documents/EHDHousingAndEmploymentAllocations_0.pdf

⁹ Medstead and Four Marks Neighbourhood Plan Examination, A Report to East Hampshire District Council. Examiner Nigel McGurk - November 2015

<https://www.easthants.gov.uk/sites/default/files/documents/Medstead%20%26%20Four%20Marks%20Neighbourhood%20Plan%20Examiner%27s%20%20Report.pdf>

¹⁰ Appeal Ref: APP/M1710/W/16/3154870. Decision date: 22 December 2016 Inspector David Cliff

https://planningpublicaccess.easthants.gov.uk/online-applications/files/52FB1760DFC7C5F2652F15CF6FEA5F8E/pdf/55949_001-APPEAL_DECISION-689681.pdf

¹¹ Appeal Ref: APP/M1710/W/15/3134150. Decision date: 09 February 2016 Inspector Kenneth Stone

https://planningpublicaccess.easthants.gov.uk/online-applications/files/D90B9603645A0233D540B22086EDDC3A/pdf/39009_005-APPEAL_DECISION-607497.pdf

¹² Appeal Ref: APP/M1710/W/17/3168191 Decision date: 27 June 2017 Inspector H Butcher

https://planningpublicaccess.easthants.gov.uk/online-applications/files/4D21D1E53ACE79D08F848E0B9B3ABFB5/pdf/30800_010-APPEAL_DECISION-723057.pdf

EHDC in their evidence base (LAA and AECOM report) have already concluded that these sites are 'undevelopable'.

EHDC carried out a 'call to sites' in 2018. The submitted sites were then reviewed by EHDC as part of the Land Availability Assessment (LAA). See Core Document 3. When considering this second consultation regarding the 10 Large Sites, it should be noted that as part of the LAA, EHDC concluded as follows regarding the M&FMNP designated area:

- Four Marks South: all of the individual sites were 'undevelopable'.
- Land South of Winchester Road: three of the sites were 'undevelopable'. Only one of the sites was considered 'developable'. Another site has been added to this group for this consultation. This was not assessed at the time of the LAA.
- South Medstead: all of the individual sites were 'undevelopable'.
- West of Lymington Bottom Road: all of the individual sites put forward were 'undevelopable'. Another site has been added to this group for this consultation. This was not assessed at the time of the LAA.

A case could be made that, by agglomerating the individual sites into one, those individual sites could be transformed from being 'undevelopable' into being developable. Having seen the proposals for each of these 4 sites, the NPSG have seen no compelling evidence that would justify any change to the conclusion that these 4 Large Sites are also 'undevelopable'.

Further, EHDC commissioned the AECOM report. This report considered the 2 sites at South Medstead and concluded that all sites to the north of the railway

*"are potentially constrained in access terms by the narrow tunnel carrying Lymington Bottom Road beneath the railway line and the narrow bridge connecting Boyneswood Road to the A31. It is difficult to envisage a combination of sites that would lead to sufficient funding becoming available to deliver road infrastructure enhancements at both locations, given the likely costs involved. Moreover, all of these sites are relatively distant from the primary schools at Four Marks and at Medstead and these facilities would not be accessible by sustainable modes (walking and cycling)."*¹³

The report also considered the 2 sites in Four Marks.

*"A number of sites – principally FM-012, FM-020, FM-021 - perform poorly on the basis that they do not relate well to the existing settlement and/or would lead to an incongruous built form (development tends to run in a linear fashion along lanes), potentially with implications for the setting of the SDNP."*¹⁴

The NPSG have reviewed the proposals put forward by the promoters but have seen no evidence to suggest that seriously challenges the conclusions arrived at by AECOM.

In summary, the NPSG believe that the original assessments made by EHDC that these sites are 'undevelopable' should stand.

¹³ Sustainability Appraisal (SA) emerging EHDC Local Plan, AECOM Infrastructure & Environment UK Limited 2018 p 29, para 5.85 <https://www.easthants.gov.uk/sites/default/files/documents/EastHampshireLocalPlanSA%20-%20Interim%20SA%20Report.pdf>

¹⁴ Sustainability Appraisal (SA) emerging EHDC Local Plan, AECOM Infrastructure & Environment UK Limited 2018 p 29, para 5.86 <https://www.easthants.gov.uk/sites/default/files/documents/EastHampshireLocalPlanSA%20-%20Interim%20SA%20Report.pdf>

The proposals do not meet the criteria for sustainable development set out in the NPPF.

In the opinion of the NPSG, the proposals for these 4 sites all fail to meet the three criteria for 'sustainable development' as stated in the NPPF – the Economic Objective; the Social Objective; the Environmental Objective. These are discussed in more detail in Core Document 1. A summary of the key points is given below:

a) An Economic Objective

The NPPF expects development *'to build a strong, responsive and competitive economy'*¹⁵. These proposals provide insufficient evidence that they will meet this objective. To meet this objective these proposals would have to provide significantly greater employment opportunities than those presented in the consultation documents. Without this, it is clear that any economic benefit that does accrue to the local settlement is small scale and temporary.

The NPPF directs that *'sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.'*¹⁶ These proposals are neither the right type of development nor in the right place.

The right type of housing would be market housing at a price that reflects the financial constraints of local people on a median salary. In this area the median house price is a very large multiple of the median salary. With a median salary of around £30,000 a house costing more than £200,000 looks unattainable to those trying to get onto the housing ladder. There is no evidence that these Large Site developments will contain any houses at this price level.

The right place for housing would be close to sources of employment and public transport.

b) A Social Objective

The NPPF states that sustainable development should *'support strong, vibrant and healthy communities'*¹⁷.

These proposals, on top of recent excessive development within Four Marks and 'South Medstead', are turning this rural community into a 'dormitory town'. As there is inadequate local employment many of the new residents will have to commute to other locations for their employment. This means that the demands of their working week make it difficult for them to contribute to a strong, vibrant and healthy community.

c) An Environmental Objective

The NPPF states that new developments should *'contribute to protecting and enhancing our natural, built ... environment'*¹⁸. These developments are planned for greenfield sites. Steps are proposed to mitigate the adverse environmental impact of the developments. These are welcomed. But the claims contained in these proposals of increased biodiversity are based on a technicality. None of the

¹⁵ NPPF (2019) para 8a

¹⁶ NPPF (2019) para 8a

¹⁷ NPPF (2019) para 8b

¹⁸ NPPF (2019) para 8c

proposed actions to mitigate the impact of the proposals on the environment can be said to be enhancing our natural environment.

The NPPF states that new developments should be '*minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy*'.¹⁹ These developments are all in locations that have poor public transport facilities, and will encourage the use of cars.

The two sites in Medstead Parish, north of the railway line, present a clearly identifiable threat to the environment. Any cars that are waiting to pass over or under the railway bridges in Boyneswood Road or Lymington Bottom Road will emit increased levels of CO₂ and NOX.

¹⁹ NPPF (2019) para 8c

None of the 4 proposals in the designated area of the M&FMNP contain adequate additional infrastructure to meet the needs of the development

The NPSG have attended the 'consultation' events and reviewed all of the information that has been provided on the 10 Large Sites. Our response is in three parts:

- i) Issues that are common to all the 4 sites in the designated area of the M&FMNP (Summary 7)
- ii) Issues that are specific to individual sites in the M&FMNP designated area (Summary 8)
- iii) Issues that relate to sites outside the designated area of the M&FMNP (Summary 8)

1. Issues that are common to all the 4 sites in the designated area of the NP

The 4 sites within the designated area of the M&FMNP are as follows:

- **Four Marks South**
- **Land West of Lymington Bottom Road**
- **South Medstead**
- **Land South of Winchester Road**

The overriding concern for the NPSG is that none of the proposals for these 4 sites provided sufficient '*planning information*' on which a considered assessment could be made. The focus of the proposals should have been on practical planning considerations to help determine whether or not the proposals represent 'sustainable development'. On major issues of concern to the community such as employment, public transport, traffic, schools, medical facilities, community facilities, utilities, air pollution and other environmental issues there is simply insufficient evidence provided to make a sensible analysis.

From the proposals presented for 'consultation', however, it is clear that none of the 4 sites meet the spatial strategy vision defined in the Draft Local Plan. That vision called for a self contained, integrated community. None of the promoters could confirm that their site provided the necessary infrastructure to sustain a community based on 600+ houses.

From the limited data that is included in these proposals, the NPSG have concluded that they all fail to meet the infrastructural needs of the community in the following areas:

Employment: none of the proposals contain indications of the number of jobs likely to be provided by the developments. In discussion, the promoters suggested a guideline of 100 to 150 per hectare of land. That is wholly inadequate for the needs of 600+ houses.

Public Transport: no increases in the provision of public transport are proposed.

Traffic: any development of 600+ houses will lead to an increase in traffic. This will cause problems on the A31; for access on to the A31; traffic flow under/over the railway; traffic along the country lanes. It was not expected that the proposals would contain definitive solutions to all these traffic problems, but the fact that the proposals failed to identify and define the problem gives no confidence that a viable and effective solution is possible.

Medical facilities: none of the developers have yet contacted the medical facilities.

This is surprising as the effective provision of medical services is one of the key concerns of the local community and each of the promoters expresses their wish to work closely with the local community.

Schools: all the promoters have recommended investment in an additional 'two form entry'. This is welcomed. However, the NPSG believe that the proposals are

- **Inadequate:** the planned expansion of the Four Marks Primary School in 2020 will not meet the full demand from the 625+ dwellings that have recently been approved.
- **Too late:** some of the proposals do not include the school until 8 years after the start of building.

Utilities: It is recognised that it is the statutory obligation of the utility companies to supply the utilities to the new development. However, none of the promoters could give any indication from discussions with the utility companies about the scale of investment required or the timescale of implementation. There is also no information available on the impact that the provision of new services to the new dwellings will have on existing residents.

Sustainable development: These 4 proposals are therefore not sustainable. Each of these sites would put increasing pressure on the existing infrastructure. As has been demonstrated in the earlier part of this document, that infrastructure does not meet the existing needs of the community as it has failed to keep pace with the 625+ dwellings that have been approved in the last 5 years. Indeed, the NPSG believe it is misleading to claim, as the promoters do that a proposal would be "helping to sustain the existing local services and facilities, including primary schools, doctor's surgeries.....". The NPSG believe that each of these proposals would put additional strain onto existing facilities. This view is supported by the Inspector in the recent appeal in the case of Land at Friars Oak (Inquiry held on 9 to 11 July 2019 by Grahame Gould BA MPhil MRTPI Appeal Ref: APP/M1710/W/19/3225766). In his appeal decision, the Inspector stated that

"91. I have also found above that the provision of further housing alone would not be conducive to reinforcing Four Marks/South Medstead's role and function as a small local service centre, given the backdrop of the scale of the house building that has recently taken place in the area. I consider that also weighs against the social benefits arising from this development.

93. In economic terms there is no suggestion that this development is needed to support the area's vitality, which I consider to be understandable given the amount of housing growth that has recently arisen."

Issues that are specific to individual sites.

The site specific issues identified by the NPSG are as follows:

1. FOUR MARKS SOUTH

- 1.1 **Doubts about deliverability:** As we understand it, this proposal has been put together by a large consortium of different entities. There is considerable evidence that these consortia have difficulty in delivering their proposals.
- 1.2 **Closure of the existing school:** The consortium proposes closing the existing 2FE primary school. This makes no sense in planning terms unless there is a robust plan to
- Build a new 2FE school in the 'centre of the settlement' 'so that more pupils can walk to school. The new proposed school site is at the extreme SE corner of the settlement policy boundary.
 - Project forward the pupil numbers that will be expected over the next 20 years to ensure that the community is 'future proofed'.

No such plan exists.

2. WEST OF LYMINGTON BOTTOM ROAD

- 2.1 **Schooling:** there is 'land designated' for schooling, but there are no indications as to how the school places might be delivered. Without any thought having been given to this critical issue for the community, this proposal must be considered undeliverable.
- 2.2 **Traffic:** The promoter has presented no analysis of the impact of increased traffic at the railway bridge over Lymington Bottom Road. It is essential that a professional mathematical model of the traffic flows be completed, prior to any allocation being made, to confirm that there is a viable solution
- 2.3 **Air pollution:** the promoter has failed to give any data on the air pollution that will result due to the increased amount of traffic waiting in a queue to get over/under the railway line.
- 2.4 **Environmental impact:** The developer claims that there will be 'environmental gains' as a result of implementing his proposals. It is difficult for the general public to believe that building 600 houses on a greenfield site with the attendant road network and associated atmospheric pollution could possibly be considered an 'environmental gain'. Similarly, claims of environmental gains based solely on biodiversity net gains show a very limited understanding of the value of our countryside to local people.

3 SOUTH MEDSTEAD

- 3.1 **Traffic:** this proposal has failed to address the issues of the traffic bottle neck over the railway line on Boyneswood Road or the access from Boyneswood Road onto the A31. In particular the fact that the junction onto the A31 is already overcapacity has been known for some time. This was confirmed by the Inspector in the recent appeal in the case of Land at Friars Oak (Inquiry held on 9 to 11 July 2019 by Grahame Gould BA MPhil MRTPI Appeal Ref:

APP/M1710/W/19/3225766)²⁰. In his appeal decision, the Inspector stated that

"46.....with the exclusion of the existing traffic from the Bellway development the Boyneswood Road arm of the junction is already operating with an RFC of 0.94, i.e. beyond its design capacity and very close to its theoretical capacity. That suggests that when the traffic arising only from the Bellway development is allowed for the junction is already in need of being improved."

The fact that this promoter has failed to give serious consideration to the impact that building an additional 600 houses nearby would have on this junction suggests that this proposal is not deliverable.

- 3.2 **Air pollution:** the promoter has failed to give any data on the air pollution that will result due to the increased amount of traffic waiting in a queue to get over/under the railway line.
- 3.3 **Community facilities:** the promoter notes that his development will enable a number of the community facilities that were identified in the Neighbourhood Plan to be completed. The promoter fails to realise that many of the ones that he lists (8.6) have already been delivered.

4 LAND SOUTH OF WINCHESTER ROAD

- 4.1 **Damage to a spectacular landscape:** The escarpment on which this development is proposed to be built would damage in perpetuity an outstanding piece of traditional English landscape. The views are spectacular. From the top of the escarpment there is a view across rolling English countryside to Cheesefoot Head - some 10 miles to the west. Similarly, the escarpment can be seen from miles away - from the South Downs National Park; from the Watercress Line Heritage Railway; and from all those travelling along the A31. These views are cherished not only by the local community but by the many tourists and visitors who are passing through this valley. We understand that an analysis carried out by CPRE has identified this as a 'valued landscape' as referred to in the NPPF.
- 4.2 **Access:** from the proposals that were presented, we believe that the access points to the site would be dangerous. As this problem has not been identified in the proposals and no solution presented, there can be no confidence that this proposal is deliverable.
- 4.3 **Flooding and Drainage:** Surface water runoff from large site on elevated/ sloped site leads to further flooding of lower areas e.g. Grosvenor Road Junction with A31, (a River Arle Augmentation Scheme site). Water from here flows into the rivers Arle and Itchen (both designated SSSIs and SACs).
- 4.4 **Highways and Traffic:** There is a single track railway bridge with blind bends on Grosvenor Road. Any traffic leaving the site to go to Basingstoke is likely to take this route which would cause congestion and road safety issues. These have not been addressed by the promoter.
- 4.5 **Environment:** We believe that this development will:

²⁰ Land at Friars Oak Farm, Boyneswood Road, Medstead

https://planningpublicaccess.easthants.gov.uk/online-applications/files/OE0B6137CB94C3288F69185351245E95/pdf/25256_045-APPEAL_DECISION-896407.pdf

- Damage Historic Hedgerow and Trees (e.g. Pilgrim's Way)
- affect the character and setting of the listed buildings and heritage assets in Parish of Ropley (e.g. North St Farmhouse, Manor Farmhouse, Turnpike Cottage)
- cause light pollution from sloping site which will be highly-visible from the adjacent SDNP.

4.6 **Spatial Strategy:** A strategic/local gap should be maintained between neighbouring settlements to prevent coalescence, keep individual identity and maintain the retention of the open character between settlements. The Land South of Winchester Road site spans Ropley and Four Marks and would completely remove any such gap.

5. Issues that relate to sites outside the designated area of the NP

5.1 With regard to sites outside the designated area of the M&FMNP, the NPSG are not qualified to comment on the detail. However, based on the information available online and at the consultation events, it would appear that many of the other sites are more sustainable and deliverable.

For example, in terms of 'strategic location', the key requirements would be that the site is close to employment and/or public transport (esp. a mainline railway station). This criterion would favour the sites at Liphook and Whitehill and Borden.

In addition, the NPSG point to two other specific issues that would suggest that some of the other sites would be more suitable than those within the designated area of the M&FMNP:

- i) Affordable Housing: there is a shortage of 'affordable housing' in EHDC and more affordable housing is proposed on most of the sites presented. However, there is not a shortage of 'affordable housing' in the designated area of the M&FMNP. This was confirmed by the inspector in the recent appeal in the case of Land at Friars Oak (Inquiry held on 9 to 11 July 2019 by Grahame Gould BA MPhil MRTPI (Appeal Ref APP/M1710/W/19/3225766)²¹. In his appeal decision, the Inspector stated that

"68. However, EHDC contends that while the provision of affordable housing in compliance with Policy CP13 would normally be considered as a significant benefit, in this instance it should be treated as attracting limited weight. That is because 130 affordable homes have or will be provided in connection with the recent house building in Four Marks/South Medstead and EHDC's housing enabling officer (housing officer) raised an objection to the development '... due to a lack of housing need and non-compliance with CP14'. While the housing officer made his assessment against Policy CP14, rather than Policy CP13, what is clear from his comments is there is currently no specific locally derived need for further affordable housing in Four Marks and Medstead"

²¹ Land at Friars Oak Farm, Boyneswood Road, Medstead

https://planningpublicaccess.easthants.gov.uk/online-applications/files/0E0B6137CB94C3288F69185351245E95/pdf/25256_045-APPEAL_DECISION-896407.pdf

ii) Neighbourhood Plan: there are 4 sites within the designated area of the M&FMNP. As far as the NPSG are aware, none of the other sites are within a designated Neighbourhood Plan area.

One of the 10 sites (Chawton Park Farm) is close to the M&FMNP designated area and the NPSG do have some local knowledge. Our main concerns about this site would be

- Access: the proposed plans for traffic access to the site would appear to be wholly inadequate to meet the needs of both new and existing local residents.
- Environmental: this area is currently a treasured route for residents of Four Marks and Medstead to access Alton without a car. The route goes through Chawton Wood and down through the exceptionally tranquil and beautiful valley below. If this area became a housing estate, it would destroy that tranquillity and may deter many from choosing not to use their cars.

ANALYSIS OF THE PROPOSALS PRESENTED BY THE PROMOTERS IN THE CONSULTATION ON THE 4 'LARGE SITES' IN THE DESIGNATED AREA OF THE M&FMNP

The brochures²² on the EHDC website put forward by the Promoters of the 4 'Large Sites' in the designated area of the M&FMNP have been reviewed with regards to their offers. This appendix gives some of the detailed evidence base upon which the views of the NPSG are based.

1. HOUSING

The information has been developed based on the data supplied by the promoters

Housing	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Size of site Ha	35.89	45	30.75	25
Houses	800	600 /700	650	600
Affordable	not stated	240/280	260	some
Older Person	Yes	Possible Class C2		
Housing Area	20.04	17.5	24.3	20
Average Housing Density	39.92	34.29/40	26.75	30
Housing design	5% self build			
Residents, (assuming) 2.4 per house	1,920	1,440/1,680	1,560	1,440

The current population of Four Marks /'South Medstead', with all the current permissions built out, is predicted to be 5,791. If a new Large Development Site is built in Four Marks/'south Medstead' the population will rise to between 7,231 (a 25% increase in population) and 7,711 (33% increase).

The offer of 'affordable housing' in this settlement is irrelevant. The EHDC Housing Officer has determined that there is not a locally defined need. This was made clear in the recent planning appeal APP/M1710/W/19/3225766 Land at Friars Oak Farm, Boyneswood Road, Medstead.²³

²² EHDC Large Sites Consultation <https://www.easthants.gov.uk/large-development-sites-consultation>

²³ APP/M1710/W/19/3225766 Land at Friars Oak Farm, Boyneswood Road, Medstead https://planningpublicaccess.easthants.gov.uk/online-applications/files/0E0B6137CB94C3288F69185351245E95/pdf/25256_045-APPEAL_DECISION-896407.pdf

In his report the Inspector stated that

“68. However, EHDC contends that while the provision of affordable housing ... would normally be considered as a significant benefit, in this instance it should be treated as attracting limited weight. That is because 130 affordable homes have or will be provided in connection with the recent house building in Four Marks/South Medstead and EHDC’s housing enabling officer (housing officer) raised an objection to the development ‘... due to a lack of housing need ... what is clear from his comments is there is currently no specific locally derived need for further affordable housing in Four Marks and Medstead.”

2. EMPLOYMENT

All four sites offer employment land. However, it should be noted that the Land West of Lymington Bottom and Medstead South, are offering the **same** site - at the junction of Soldridge Road and Lymington Bottom Road.

However, none of the promoters have provided any information as to how many jobs their proposals might provide. A simple analysis has been carried out based on the assumptions that

- The plan should be based on ‘one job per house’
- The land allocated will provide 150 jobs per ha

It is apparent (see table below) that none of the sites has the potential to offer employment to all the new residents. They will therefore need to commute elsewhere for jobs.

Employment:	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Number of houses	800	600/700	650	600
Additional jobs needed	800	600/700	650	300
Land Ha	1.25	2	2	2
Jobs at 150 per Ha	188	300	300	300
Other jobs (e.g. retail, care home)	50	50	50	50
Total jobs	238	350	350	350
Shortfall in provision of local employment	562	250/350	250	250

3. PUBLIC TRANSPORT

None of the promoters have recommended any increase in the quantum of public transport to meet the needs of the additional residents.

4. TRAFFIC

In the designated area of the M&FMNP, the recent increase in traffic is a significant problem and is a major concern of local residents.

One of their biggest concerns is about air pollution. Where cars are stationary in a traffic jam there is an unnecessary increase in CO₂ emissions. These queues typically occur at pinch-points.

Currently, within the designated area, the key pinch points are

- Onto the A31 at Telegraph Lane
- Onto the A31 at Boyneswood Road
- Under the railway Bridge on Lymington Bottom Road
- Over the railway bridge at Boyneswood Road

All of the promoted sites would put additional pressure on these bottle necks. See table below.

For the Morning peak:

Transport	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Houses	800	600 / 700	650	600
Number of cars at peak hour a.m. ²⁴	634	476 / 555	516	476
Additional Cars/ Minute a.m.	11	8 / 9	9	8
Current amount of traffic a.m. Winchester Road ²⁵	1,464	1,464	1,464	1,464
Total Traffic A.M Winchester Road	2,098	1,940 / 2,019	1,980	1,940

For the Afternoon peak

²⁴ 25256/045 | Outline application - Development of up to 58 Dwellings (including up to 23 Affordable Homes) with Access to be determined, including associated Garages, Car parking, Infrastructure, OpenSpace, landscaping and potential dedication of land for community use (Access only to be considered) (Amended site address and planning ref. no.) | Land at Friars Oak Farm, Boyneswood Road, Medstead, Alton William Lacy Group Proof of Evidence Re Highway Matters by Ian Roberts, MCIHT, Appendix 3
https://planningpublicaccess.easthants.gov.uk/online-applications/files/A6199B8BB2A115B3221DBA35CB54A74E/pdf/25256_045-HIGHWAYS_PROOF_AND_APPENDICES_19.06.11-GDB-5271-POE.4-864501.pdf

²⁵ 25256/045 | Outline application - Development of up to 58 Dwellings (including up to 23 Affordable Homes) William Lacy Group Proof of Evidence Re Highway Matters by Ian Roberts, MCIHT, Appendix 3 - Sum of Vehicles , travelling East & West A31 , 8.15 to 8.45 a.m.

Transport	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Houses	800	600 / 700	650	600
Number of cars at peak hour p.m.²⁶	524	393 / 459	426	393
Additional Cars/ Minute p.m.	9	7 / 8	7	7
Current amount of traffic p.m. Winchester Road	1,468	1,468	1,468	1,468
Future amount of traffic	1,992	1,861 / 1,927	1,894	1,861
Percentage Increase	35.69%	26.77% / 31.27%	29.02%	26.77%

The promoters, in presenting their proposals, have shown little understanding of the problems; have failed to quantify the impact that their proposals will have on the existing infrastructure; and have not presented any ideas about how this impact might be mitigated.

The NPSG have carried their own calculations which indicate that the impact of the any of the sites on the local traffic would be significant. The NPSG are of the opinion that there may be no viable solution to some of the impacts. But the NPSG recognise that they are not experts and cannot present a professional quantification of the impact.

The NPSG therefore suggest that a full and professional mathematical modelling of the traffic flows from these proposed sites be carried out (e.g. by Hampshire Highways) prior to any allocations being decided.

Before the appropriate robust, professional assessment is carried out, none of these sites can be considered deliverable.

5. EDUCATION

The table low assesses whether or not the proposals from the promoters would provide sufficient school places for the number of children that would be expected to live in the new houses. The data is based on the advice from the Local Education authority that each new house will generate 0.3 of a primary and 0.21 of a secondary pupil.

²⁶ 25256/045 | Outline application - Development of up to 58 Dwellings (including up to 23 Affordable Homes) William Lacy Group Proof of Evidence Re Highway Matters by Ian Roberts, MCIHT, Appendix 9 - Extended figures- Sum of Vehicles , travelling East & West A31, https://planningpublicaccess.easthants.gov.uk/online-applications/files/A6199B8BB2A115B3221DBA35CB54A74E/pdf/25256_045-HIGHWAYS_PROOF_AND_APPENDICES_19.06.11-GDB-5271-POE.4-864501.pdf

Education	Four Marks South*	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Houses	800	600 /700	650	600
Primary pupils generated	240	180/210	195	180
Promoters proposal = 2 FE = 30 x 2 x 7 = 420	420	420	420	420
Over/(under) provision	(180)*	240/210	225	240
Year of delivery	5	8	?	?
Secondary pupils generated	168	126/147	137	126
Secondary Pupils Proposals per site	0	0	0	0
Over/(under) provision	(168)	(126)/147)	(137)	(240)

* Four Marks South -Promoter propose to demolish the existing Four Marks CofE Primary School and replace with one of the same size without an increase to allow for the pupils generated from the site.

Primary school: All four sites offer a 2FE school or funding, if required, to the Local Education Authority. The NPSG welcome the fact that this offer would exceed the needs of the residents in the new houses and help make up the recent shortfall. However, it should be noted that

- i) Four Marks South proposes to demolish the existing 2FE school and replace it with one of the same size, which would not be practical as it would not accommodate all the new pupils generated by the development.
- ii) None of the proposed schools would be completed for 5 years from Year 1 of the project.

Secondary school: none of the promoters is planning to provide any additional secondary school places.

6. MEDICAL FACILITIES

The NPSG were very disappointed to discover that none of the promoters had contacted either of the surgeries. On an issue that is of such significance to the community, that gives the community no confidence that any of the promoters will have provided the appropriate resources to meet the needs of the community.

The NPSG have contact the key local surgeries who have supplied the data shown in the table below.

Mansfield Park Surgery

	GPs	GPs WTE	Nurse practitioners	Nurses	Medical Staff	Appointments	Registered Patients
2104	6	3.63	0	2	5.63	25,263	7271
2015	6	3.94	0	2	5.94	28,944	7218
2016	6	4.03	0	2	6.03	32,639	7189
2017	6	4.34	0	2	6.34	38,118	7192
2018	6	4.13	1	2	7.13	42,275	7170
					127%	167%	99%

Boundaries Surgery

	GPs	GPs WTE	Nurse practitioners	Nurses	Medical Staff	Appointments	Registered Patients
2104	Not available	2.25	0	1.1	3.35	Not available	3573
2015	Not available	2.25	0	1.1	3.35	Not available	3664
2016	Not available	2.25	0	1.1	3.35	Not available	3755
2017	Not available	2.25	0	1.6	3.85	Not available	3884
2018	Not available	2.25	0	1.6	3.85	14,445	3977
					115%		111%

Notes: As at 1st Sept each year.
WTE refers to Whole Time Equivalent.

This table shows that, in the case of Mansfield Park Surgery, there has been increased pressure on the medical facilities. It shows that the medical staff have increased by 27%, but the number of appointments by 67%. As a result each of the medical staff is required to offer a greater number of appointments.

However, the most striking data from this table is that the increase in pressure coming from existing patients. As can be seen from the table, whilst there was a 67% increase in appointments during the last 5 years, the number of registered patients fell by 101. At the same time the number of patients registered at Boundaries Surgery grew by 404 giving a net increase of 303 patients. This is a surprisingly low percentage coming from the 625+ new houses.

This means that the increased pressure on the medical facilities is coming from existing residents.

The NPSG have discussed these figures with the surgeries and they believe that this unexpected result is due to fact that

- i) New residents often do not register with the doctor until they experience some illness
- ii) The new residents may have stayed with their existing practice if they have moved from a relatively nearby location.

However, it suggests that the total impact of the 625+ new houses has yet to be absorbed by the current facilities. If there was an additional 600+ houses this would put even greater pressure on these facilities.

The NPSG have discussed the impact of an additional 600+ houses with the surgeries and they believe that

- i) Buildings/ land: both surgeries would be able to expand
- ii) Medical staff: The biggest challenge would be recruitment of the necessary additional staff. The shortage of GPs is a national issue, but in the context of this shortage it is more likely they could be recruited at the site which was closest to a major urban area.

Furthermore, the proposals presented by the promoters of the Large Sites failed to put forward any ideas as to how these challenges could be met. In our view, the proposals therefore fail to meet the criteria for 'sustainable development' specified in the NPPF and cannot be considered deliverable. The lack of clarity about how the medical needs of the local community will be met over the next 5 years suggests that these proposals are not sustainable.

7. COMMUNITY FACILITIES

The Four Marks South site offers 0.2 Ha of land for a community building but who provides the building is unspecified.

The Land South of Winchester Road site is providing 1.0 Ha but indicates the provision of a building of unspecified size and multiple purpose uses.

The Land West of Lymington Bottom site, intimates that the proposed School building, if provided, could be used for community use.

The South Medstead site proposes that the local community would provide the new infrastructure through CIL, on land outside the development.

8. ENVIRONMENT

Rights of way: The promoter of each site has, in their brochures, offered indicative internal paths linking parts of their development:

	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Internal Paths	Yes	Roads only	Not Definable	BOATS Stoney Lane and Boyneswood Lane.
Do they interlink across site?	No, although there appears to be a way across land not owned by the promoter	Yes	Roads Only	Disjointed Route
Entrances to Site	8	3	8	11
Type of Development	Cul-de-sac, with 5 individual plots	Precincts around Rights of Way 2.8 km footpaths	Not Clear	Cul-de-sac, with 4 individual plots
Other Proposals	Footpath along Alton Lane	Links to adjacent roads 2.8 km footpaths Footpath link to the FM Cricket field.		Footpath to Lymington Bottom Road Via CALA Estate
Link to other rights of Way	Yes	Yes	Yes	Yes
	Footpaths to A31 (HCC Ref: 095/05/1) and Hawthorne Lane (HCC Ref: 095/07/2) Long Distance Path – St Swithun's Way	BOAT (HCC Ref: 199/40/1).	Footpath (HCC Ref: 155/19/1) to Medstead	Bridleway to Boyneswood Road, (HCC Ref: 155/32/2), Bridleway to Railway station (HCC Ref: 155/31/2). Footpath to Medstead (HCC Ref: 155/30/1).

The NPSG welcomes the majority of the proposals with regard to Rights of Way, especially the Land South of Winchester road which offers a footpath link to Barn Lane - an aspiration in the M&FMNP Green Infrastructure plan.

8.2 Environmental Offer

8.2.1 Each site promoter made an environmental statement within their brochure²⁷, which have been tabulated below.

Site Uses	Four Marks South	Land South of Winchester Road	Land West of Lymington Bottom Road	South Medstead
Biodiversity		<p>Approx 18.6 Ha of Green Infrastructure (including formal and informal open space, habitat creation, play space, SuDs, allotments and structural planting)</p> <p>Enhancement including new woodland, wetland and meadow creation.</p> <p>Diversification of habitats and the creation of wildlife corridors.</p>	<p>the opportunity to deliver a self-contained SuDS strategy and a range of environmental gains to enhance biodiversity habitats, wildlife networks and species rich soft landscaping.</p> <p>Will retain existing landscape features such as established trees and hedgerows</p>	<p>Some existing trees and hedgerows, some of which could be retained as green features</p> <p>New planting as part of a comprehensive landscape master plan, which would include employing SuDs to create wildlife and amenity features, such as swales and ponds. There is therefore opportunity to achieve a net gain in biodiversity.</p>
Avoid impacts	<p>Potential for new habitat creation including priority habitats within the Hampshire Biodiversity Action Plan.</p>	<p>Offsite planting along the Watercress Line and A31</p> <p>Open space areas will comprise of informal 'Country Parkland', wide greenways to provide car free circulation and play space, and community growing areas.</p>	<p>Balancing ponds for wildlife.</p> <p>Flower rich lawns.</p> <p>Buffer zones and soft edges more gradual transitions between boundaries.</p>	<p>Provide a sequence of green spaces through the development providing green 'stepping stones' to the open countryside</p>

²⁷ EHDC Large site Consultation
<https://www.easthants.gov.uk/large-development-sites-consultation>

<p>Other mitigation</p>	<p>Creation and improvement of ecological networks.</p> <p>Opportunity to enhance hedgerows, with additional planting.</p> <p>To improve the connections between woodland parcels in the SINC along Alton Lane.</p>	<p>Existing tree and hedgerow planting define existing field parcels: Existing planting will be retained and enhanced.</p> <p>Additional land for the existing Recreation Ground.</p> <p>Planting will be specifically designed to help improve air quality.</p>	<p>Retaining trees as focal points within the development.</p> <p>Using native species.</p> <p>Re-use materials – create landforms for planting, such as mounds and slopes.</p> <p>Making use of 'left over' spaces –in plot layouts by planting shrubs or trees (such as mini orchards), or as SuDs features instead of turfing.</p> <p>5.5Ha of formal public open space</p>	<p>New open spaces, to create a green setting for the new homes and other development.</p> <p>New planting and 'green corridors' could be including, as well as potential for 'wildlife' walks helping to maintain a soft transition between the built-up areas and the surrounding open countryside.</p>
<p>Connectivity</p>	<p>Improve connectivity through Four Marks (e.g. between Old Down Wood and Weathermore Copse).</p>	<p>Circa 2.8km of footpaths and cycle ways, linked to the existing network.</p>	<p>Delivery will include multi-purpose green infrastructure links that will enable walking and cycling as a recreational activity as, part of a comprehensive landscape strategy.</p>	<p>New public open spaces would be created, to create a green setting.</p> <p>New planting and 'green corridors' as potential for 'wildlife' helping to maintain a soft transition between the built-up areas and the surrounding open countryside.</p>

The NPSG welcome all the steps that the promoters plan to take to mitigate the impact that their proposals will have on the local environment.

But the NPSG cannot accept that any of these proposals can be considered a 'net gain'. It is difficult for the general public to believe that building 600+ houses on a greenfield site with the attendant road network and associated air pollution could possibly be considered an 'environmental gain'. Similarly, claims of environmental gains based solely on biodiversity net gains show a very limited understanding of the value of our countryside to local people. For example, it is counter-intuitive to claim that setting up a new wildlife corridor through people's back gardens to replace a natural one that ran through a field can be considered an environmental net gain.

Comments on 10 large sites



Thu 10/10/2019 11:49

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: chair.medsteadpc@gmail.com <chair.medsteadpc@gmail.com>; clerk.medsteadpcatgmail.com <clerk.medsteadpc@gmail.com>

Regulation 18 Consultation
Comments from Medstead Parish Council

OVERALL

Accept

Medstead Parish Council **accept** that two or three large developments of 600 – 1200 properly planned sites with appropriate infrastructure are far better than many sites of 40 – 100 with no infrastructure and with no cumulative planning. However if EHDC are to reach their target of providing 2,000 plus dwellings by using two sites then only the ones that can produce 1,000 plus should be considered as the last paragraph of the heading 'Why is the council consulting, etc' on page 5 of the Large Development Sites Consultation document very clearly states *'The Proposed Submission Local Plan (scheduled for consultation in Spring 2020 Regulation 19 stage) will identify the Council's proposed large development sites (up to two)'*

It is very clear that EHDC have accepted that the two large sites at Northbrook Park and Whitehill & Bordon meet all the criteria required to provide properly planned development providing the necessary 2,000 plus dwellings and overall Medstead Parish Council can not see any proposed sites that are better than those included in the previous draft of LP3.

The unique Village Trust scheme proposed within the Northbrook Park site should be a requirement for any of the chosen sites.

finding the rat run from the A32 to the A339, avoiding the delays and extra mileage caused by these works. Experience shows that the vast majority of people will continue to use this route even when normality returns to The Butts bridge area, therefore any traffic surveys that are being used will have to be re-done to capture this extra traffic and additional mitigation works carried out. This increase in traffic also poses yet more danger to pedestrians and horse riders, given the number of horses in the area, as no footpaths exist for much of the route, the roads being unlit and have very poor white lining.

The two parishes have lived with construction traffic and all the other problems that construction sites bring for the last 5/6 years and have experienced the ineffectiveness of the agreed developers Construction and Environmental Plans. Much of which is unenforceable and anything outside of the site area is not within the control of the LPA.

All developers mention the economic gain during the construction phase but it is well known locally that only a very small percentage of the labour force actually lives within a ten mile radius. The local outlets selling coffee, sandwiches and scratchcards may benefit from this workforce on the smaller sites but a site of this size would probably have it's own canteen.

Any one of these proposed sites would mean the irrevocable loss of yet more agricultural land and open space together with the biodiversity that is present . While developers will claim to provide mitigation it can never be equal to that which has been lost for ever.

Not one of the sites has had any surveys carried out, be they ecological, archaeological, wild life, etc nor done any modelling on the impact of the additional traffic.

None of the 4 sites are in line with EHDC's criteria of coherent development, etc.

Not one of the consortiums has consulted with either the parish councils or general public over these proposals.

If one of the alternative sites can provide a 'Village Trust' why is it that not one of these proposals can offer that a part of the package?

The M&FMNP group have spent many hours on preparing very detailed report and comments on these and MPC fully endorses their findings and comments and will try not to repeat any of it in detail

These four proposals are therefore **UNSUSTAINABLE, UNDELIVERABLE, UNNECESSARY and UNSUITABLE.**

There are better options that have been put forward – it is EHDC's duty to select the best for the whole district !!

Comments on 10 large sites



Thu 10/10/2019 12:02

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: chair.medsteadpc@gmail.com <chair.medsteadpc@gmail.com>; clerk.medsteadpcatgmail.com <clerk.medsteadpc@gmail.com>

Regulation 18 Consultation

Comments from Medstead Parish Council

Land west of Lymington Bottom Road

Oppose

This area uses multiple parcels of land some of which are only vaguely linked and would mean an incoherent overall plan. It is also in the ownership of several individuals/companies and it is therefore questionable if it can be delivered within the necessary time scale.

The additional traffic generated would cause serious blockages on LBR, particularly travelling in either direction at the single lane bridge under the railway and at the junction with the A31. The main traffic route out of the site is through the recently developed estate on a narrow road with very tight 90 degree bends.

Comments on 10 large sites



Thu 10/10/2019 12:04

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: chair.medsteadpc@gmail.com <chair.medsteadpc@gmail.com>; clerk.medsteadpcatgmail.com <clerk.medsteadpc@gmail.com>

Regulation 18 Consultation

Comments from Medstead Parish Council

South Medstead

Oppose

This area uses multiple parcels of land some of which are only vaguely linked and would mean an incoherent overall plan. It is also in the ownership of several individuals/companies and would use **three** developers meaning that it is therefore questionable if it can be delivered within the necessary time scale.

To reach the required numbers it uses a site of 50 dwellings that has **already** been built out, a parcel of land on the other side of LBR and employment land that is again on the west side of LBR.

The additional traffic generated would cause further blockages at both the railway bridges (in Lymington Bottom Road and Boyneswood Road) both of which operate a single lane system and at both junctions with the A31. In particular pedestrians using the virtual 'footpath' across the railway bridge in Boyneswood Road would be put in to further danger by the increase in traffic volume.

Comments on 10 large sites



Thu 10/10/2019 12:05

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Regulation 18 Consultation

Comments from Medstead Parish Council

Four Marks South

Oppose

This area uses multiple parcels of land some of which are only vaguely linked and would mean an incoherent overall plan. It is also in the ownership of several individuals/companies and would use **five** developers meaning that it is therefore questionable if it can be delivered within the necessary time scale. It is also known that some of the included proposed area is not within the control of the consortium.

The additional traffic generated would cause further traffic congestion during peak hours on all of the junctions onto the A31 which are already at or beyond capacity (see Atkins Report Part 2)

Comments on 10 large sites



Thu 10/10/2019 12:07

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: chair.medsteadpc@gmail.com <chair.medsteadpc@gmail.com>; clerk.medsteadpcatgmail.com <clerk.medsteadpc@gmail.com>

Regulation 18 Consultation

Comments from Medstead Parish Council

Winchester Road, Four Marks

Oppose

This area uses land that is held by fewer individuals/companies but the areas are split by the A31.

The main bulk of the housing would cause considerable harm to the vista when approaching Four Marks from the west. The creep westwards must be halted and the brow of the hill and parish boundary is the logical place to stop.

The additional traffic generated would further increase the already very heavy traffic flow through the heart of Four Marks

Comments on 10 large sites



Thu 10/10/2019 12:09

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: chair.medsteadpc@gmail.com <chair.medsteadpc@gmail.com>; clerk.medsteadpcatgmail.com <clerk.medsteadpc@gmail.com>

Regulation 18 Consultation

Comments from Medstead Parish Council

Chawton Park

Oppose

While this site meets the criteria of a 'self contained' village it is very difficult to see how the greatly increased traffic from such a large scale development can ever flow under the single lane railway bridge or along Chawton Park Road onto Whitedown Lane especially when the other proposed developments that will exit onto Chawton Park Road are included into the cumulative effect.

Comments on 10 large sites



Thu 10/10/2019 12:14

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: chair.medsteadpc@gmail.com <chair.medsteadpc@gmail.com>; clerk.medsteadpcatgmail.com <clerk.medsteadpc@gmail.com>

Regulation 18 Consultation

Comments from Medstead Parish Council

Northbrook Park

Approve

This ticks all the boxes, single ownership, easy access to A31, meets the criteria of a 'self contained' village, has undergone some local consultation, and proposes a unique village trust. This scheme has more detail on what will be provided that is lacking in many other proposals.

It is very clear that EHDC have accepted that this site meets their criteria required to provide properly planned development providing the necessary number of required dwellings and Medstead Parish Council can not see that any of the other proposed sites are better than those included in the previous draft of LP3

Large Development Site Consultation



Mon 07/10/2019 09:10

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (66 KB)

Letter to EHDC planning 1-10-19.docx;

Please find attached letter of objection on behalf of the MHR Ltd



MID HANTS RAILWAY LTD

Registered Office:
The Railway Station,
Alresford, Hampshire, SO24 9JG

Tel: 01962 733810
Mob: 07736 015042
Fax: 01962 735448

1st October 2019

Dear Sirs,

Reference: draft local plan - Large Development Sites

On behalf of the board of the Mid-Hants Railway Limited I am directed to object to the following schemes proposed for Medstead and Four Marks:

South Medstead

- I. Highways and Travel
 - a. Limited local employment means that Medstead/Four Marks will be even more of a dormitory town with greater pressure on already overcrowded roads in the area. The A31 is already heavily congested because of the lack of alternative routes and modes of transport.
 - b. The creation of a “mixed use hub around the heritage railway station” will increase the demand for access across the railway. The plan clearly envisages continued and increased use of the permissive footpath over the railway at the station. Currently the railway allows the small number of pedestrians wanting to cross the railway at the station to move between Four Marks and Medstead to use the level foot crossing when the railway is closed and the footbridge when the railway is operating. Neither the flat crossing nor the bridge would be capable of sustaining increased levels of use and the railway would be forced to close both permanently except to its own passengers. In our view there is no way to enhance or enlarge these arrangements without a major reconstruction of this historic railway station, and such reconstruction would destroy a key part what attracts visitors to travel on the railway.
 - c. The increased pedestrian and vehicular traffic in the vicinity of the station would disrupt the daily deliveries and movements into and out of the upper and lower yard areas at the station.
 - d. Increased traffic along Lymington Bottom Road which would be incompatible with a single carriageway bridge.
 - e. The position of the proposed circus and travelers sites may give rise to a concern about the increased likelihood of large vehicles striking and damaging Lymington Bottom Road Bridge

West of Lymington Bottom Road

- I. Highways and Travel

- a. Limited local employment means that Medstead/Four Marks will be even more of a dormitory town with greater pressure on already overcrowded roads in the area. The A31 is already heavily congested because of the lack of alternative routes and modes of transport.
- b. Increased traffic along Lymington Bottom Road which would be incompatible with a single carriageway bridge.
- c. The position of the proposed circus and travelers sites may give rise to a concern about the increased likelihood of large vehicles striking and damaging Lymington Bottom Road Bridge

Land South of Winchester Road, Four Marks

1. Flooding and drainage
 - a. Surface water runoff from this large site is likely to exacerbate issues with flooding on the lower parts of the A31 which already causes local disruption from time to time.
2. Highways and Travel
 - a. Limited local employment means that Medstead/Four Marks will be even more of a dormitory town with greater pressure on already overcrowded roads in the area. The A31 is already heavily congested because of the lack of alternative routes and modes of transport.
 - b. Grosvenor Road and Gravel Lane are unsuitable access routes as both are single track without pavements
 - c. Grosvenor Road bridge is single carriageway and could not support increased traffic without redevelopment.
 - d. The position of the proposed circus and travelers sites gives rise to a concern about the increased likelihood of large vehicles striking and damaging Grosvenor Road Bridge
3. Amenity and character of open countryside
 - a. There will be a considerable loss of amenity. A development of this scale in this location will destroy the rural character of the area. The Mid-Hants Railway has around 150,000 visitors a year, and we know from feedback that a key part of the attraction are the views of rural Hampshire from the train. The proposed development is likely to be visible from the train for the majority of the journey between Ropley Station and Medstead and Four Marks station. During the day an unspoilt section of open countryside will have become concrete, and by night the dark sky tranquility of the area will also have been lost.
 - b. This part of the railway is a favourite with photographers. Their efforts are published widely in the national and specialized press helping to bring visitors to the railway and the area.
 - c. The railway runs on an embankment throughout the area of development, and it will be impossible to screen or reduce the impact of the development.
4. General
 - a. The loss of amenity is highly likely to cause an unsustainable reduction in the number of visitors to the railway. The Directors are concerned that this development could have a catastrophic effect on the viability of the railway to continue to operate at all.


Joint Interim General Manager

VAT Registration No. 293 505155
Registered in England No. 1117090

Representation received. ID:27372

East Hampshire District Council <easthants@jdi-consult.net>

Sun 13/10/2019 16:41

To: [REDACTED]
[REDACTED]

Your representation has been received.

ID: 27372

Type: Object

Document: Large Development Sites

Section: SWR6: Is there any reason that this is not achievable?

Summary:

Full Text:

To commit to investigating measures to improve highway safety does not commit the developer to doing anything, so nothing will be done.

Alternative sites in Bordon and Whitehill or even one within the existing confines of the villages of Four Marks or Medstead would be preferable to this green belt site

Representation received. ID:27373

East Hampshire District Council <easthants@jdi-consult.net>

Sun 13/10/2019 16:41

To: [REDACTED]
[REDACTED]

Your representation has been received.

ID: 27373

Type: Object

Document: Large Development Sites

Section: SWR5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

Summary:

Full Text:

The A31 is an inadequate trunk road with mainly low speed limits in this area. Public transport service is negligible, which will result in all the proposed developments in Four Marks substantially increasing traffic on an already crowded road. The bulk of new residents will have to travel to work by car and the existing car park at Alton station is already full before the end of the rush hour. Adding seven new entrances to the site directly off the A31 will create more traffic hazards with great risk to safety, especially as five are on the hill.

Representation received. ID:27374

East Hampshire District Council <easthants@jdi-consult.net>

Sun 13/10/2019 16:41

To: [REDACTED]
[REDACTED]

Your representation has been received.

ID: 27374

Type: Object

Document: Large Development Sites

Section: SWR4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.

Summary:

Full Text:

Remove the areas of employment plus gypsy and traveller plots plus the housing on the west facing slopes of the downs would make the development more acceptable. It would then not be a large site as there would be <600 new houses.

Representation received. ID:27375

East Hampshire District Council <easthants@jdi-consult.net>

Sun 13/10/2019 16:41

To: [REDACTED]
[REDACTED]

Your representation has been received.

ID: 27375

Type: Object

Document: Large Development Sites

Section: SWR3: Do you know of any other constraints to developing the site? Please provide detail and evidence.

Summary:

Full Text:

At present the western approach to Four Marks is entirely rural in nature. Developing land on the side of the hill extends the visual intrusion of Four Marks miles to the west affecting visual amenity from the road and The Watercress Line. At present the only property visible from the railway is the original heritage navvies building known as The Shant. This proposal would completely change the rural nature of this area and degrade the countryside views from the railway.

Representation received. ID:27377

East Hampshire District Council <easthants@jdi-consult.net>

Sun 13/10/2019 16:41

To: [REDACTED]

[REDACTED]

Your representation has been received.

ID: 27377

Type: Object

Document: Large Development Sites

Section: SWR1: Do you have any comments on the proposed uses?

Summary:

Full Text:

Developing land which is green belt and outside the development boundary of Four Marks is totally unsuitable. [REDACTED]

[REDACTED]

What is a local centre " this total lack of definition opens up the opportunity for a purely token element.

East Hampshire District Council: Large Development Sites Consultation

Projectmail - National Grid <n.grid@woodplc.com>

Fri 11/10/2019 13:54

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (90 KB)

Large Development Sites REP 10.10.19.pdf;

Dear Sir/Madam,

Please find the attached response on behalf of National Grid.

Kind regards

Wood on behalf of National Grid

-

Planning & Design| E&I UK

Wood Plc

Nicholls House, Homer Close, Leamington Spa, CV34 6TT

Tel +44 (0)1926 439000

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

██████████
Consultant Town Planner

Tel: 01926 439116
n.grid@woodplc.com

Sent by email to:
localplan@easthants.gov.uk

10 October 2019

Dear Sir / Madam

**East Hampshire District Council: Large Development Sites Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

██████████
Consultant Town Planner

n.grid@woodplc.com

Wood E&I Solutions UK Ltd
Nicholls House
Homer Close
Leamington Spa
Warwickshire
CV34 6TT

██████████
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
Warwickshire
CV34 6DA



Yours faithfully

[via email]

██████████

Consultant Town Planner

cc. ██████████ National Grid

Natural England further response to the Large Development Sites Consultation

Extension Land East of Horndean

November 2019



Summary

1. Further to Natural England's comments of 15 October it can now be advised that the need to take account of the protection of the local Bechstein's Bat population is likely to require a significant reduction in housing from that proposed.

Further Advice

2. Recent work in the location of this allocation for the current allocation HN1, Land East of Horndean, and the Havant Thicket Reservoir Project is resulting in a growing body of survey evidence of the presence of a local Bechsteins Bat population.
3. The rare Bechsteins bat is a European Protected Species and there is a requirement to maintain and restore its conservation status in the UK.
4. The DEFRA Bechsteins Species Action Plan and the local Hampshire Biodiversity Action Plan requires all roosts and feeding areas to be protected from loss or deterioration.
5. Survey indicates that Bechsteins bats roost in nearby woodland and use woodland, woodland/grassland edge and mosaics and corridor habitats to roost, feed and move between feeding and roosting sites.
6. Bechsteins bats are known to be sensitive to urbanisation effects of light and noise and do not occur in urban areas.
7. Impacts of this allocation on the local population of bats should be considered cumulatively with impacts of other local developments at Land East of Horndean and Havant Thicket Reservoir.
8. Protecting the land used by the local Bechsteins bats is likely to require a significant reduction in the proposed housing area to leave sufficient undisturbed habitat features to maintain population requirements.
9. It should also be noted that there is potential for knock-on effects of this allocation for a key infra-structure project - Havant Thicket Reservoir. Havant Thicket, as well as supporting its own conservation interest, is a biodiversity mitigation and compensation area for the Reservoir project and managing recreational pressure will be important in achieving these aims. This adjacent allocation will increase recreational pressure within Havant Thicket.

██████████

Lead Advisor

21/11/2019

EHDC large sites – WH & Bordon

The following comments are based primarily on desk-based assessment, augmented with some local knowledge and experience. SANG site visits will be necessary for a definitive response.

Summary

Based on a minimum rate of 8ha/1000 population, W&B requires approximately 18 ha of new SANG to accommodate 1294 new dwellings, given that Hogmoor SANG has existing capacity for 350 dwellings.

In relation to the comments below around SANG proposals, only Oxney SANG appears to be both suitable and deliverable at this stage. However Oxney SANG currently provides only 8.55 ha of (net) SANG, creating capacity for an additional 445 dwellings.

Natural England is therefore of the view that existing capacity at Hogmoor SANG, coupled with new capacity from Oxney SANG is sufficient to accommodate 795 new dwellings at Whitehill and Bordon.

This is significantly lower than the numbers of dwellings proposed. Natural England is however committed to engaging constructively and flexibly with the developer and planning authority in attempting to work through outstanding issues.

General comments

Natural England recognises the significant investments to road, commercial, community infrastructure and greenspace (SANG) that have been necessary as part of the regeneration of the town, following a decision by the MOD to close Bordon garrison.

Constraints

The case for further expansion/intensification of W&B must also consider the proximity of a suite of internationally-important nature conservation sites that are known to be vulnerable to the pressures associated with residential development, including recreational disturbance to ground-nesting birds. Mitigation will involve both SANG and SAMM and both will require firm prospects for secured long term delivery for an allocation to pass the necessary Habitat Regulations tests for Reg 19 of the Local Plan Review

There are also a number of other areas of importance for nature conservation immediately surrounding the proposed development. In addition to locally significant broadleaved woodland, there is a mosaic of habitats likely to function as supporting habitat for the SPA, including areas of acid grassland, heath, sparsely-vegetated ground and wetlands.

In addition and outside of the requirements of the Habitat Regs., any other losses of priority habitat should be compensated for.

SANGs

Additional residential development at W&B will require new infrastructure in the form of suitable accessible natural greenspace (SANG), which is attractive to dog owners. Guidance on SANG design is available from Natural England. It should be noted that Natural England will not normally accept SANG that is located within 400m of a heathland. A number of SANG proposals have been outlined in the consultation – comments as follows:

Broxhead Common: this proposed SANG area is adjacent to and contiguous with an area of the common that is designated as SSSI/SPA; in practice they are one and the same land parcel of registered common. Due to its immediate proximity the Broxhead common proposal is therefore unsuitable for use as SANG.

Gibbs Lane: this proposed SANG area is located entirely with 400 m of Shortheath Common SAC. Again this proximity to a heathland means Natural England views this proposal as unsuitable for SANG

This issue of proximity is compounded by existing linear infrastructure i.e. rights-of-way, providing excellent links onto Shortheath SAC, not only from the SANG but also from the northern and southern ends of the proposed development site, enabling an attractive circular walking route through the SAC. This increases the likelihood of additional recreational disturbance; Shortheath is known to support Annex 1 birds.

Gibbs Lane is also open to motorised vehicles and mountain bikes – abuse of this routeway, a potential impact of increased urbanisation here, would be challenging to mitigate.

Slab Common: the proposal for SANG involves partitioning a section of Slab Common, a registered common totalling 135 ha. To enclose this part of the common for off-lead dogs would require consent from the Planning Inspectorate on behalf of the Secretary of State; therefore there is currently no surety that this can actually be delivered.

The site comprises a mosaic of habitat types associated with heathland; given the attributes of this site with regard to location, local connectivity, scale and diversity, Slab Common may be viewed as a site of significant current and potential value to the ecological network.

Therefore Natural England currently has reservations around the proposed use of this site as SANG.

Oxney: on paper this proposal appears to be the most appropriate of those put forward as SANG. It is not within 400m of a significant heath and, as broadleaved woodland habitat, is unlikely to provide nesting habitat for Annex 1 birds.

To provide real added value to recreational users however, consideration should be given as to how best this area could extend to other local green infrastructure e.g. Hogmoor SANG.

It should also be noted that NE guidelines for minimum SANG provision of 8 ha/1000 residents generally apply to areas which have little intrinsic ecological value. However where a proposed SANG is for example a SINC site, Natural England may recommend that a provision of 16 ha/1000 is more appropriate.

Hogmoor: already established as a strategic SANG, the current proposals include elements which may be detrimental to the accessibility and attractiveness of Hogmoor. The expansion of commercial space at the northern end of the SANG may effectively sever Hogmoor from other green infrastructure/SANG to the north as well as potentially having an adverse impact on its character as a natural green space. Similarly, the introduction of residential, albeit low density, development within the Croft restricts the opportunity for this area to effectively contribute additional scale and linkage to Hogmoor.

Opportunities/ Cross-boundary considerations

Net Gain: expansion of W&B provides opportunities for Net Gain for the environment as outlined in the DEFRA 25 Yr Plan and is being delivered for East Hants through new policy in the Local Plan Review. It should be noted that the promoter's comment that Net Gain is delivered by provision of SANG is not correct – SANG is mitigation and Net gain to biodiversity needs to be delivered in addition to the SANG function – although SANG may provide Net Gain opportunities. The extent, quality and potential of ecological assets surrounding W&B provides excellent scope for strategic off-site enhancements in particular. While concerns have been raised above around suitability of some SANG proposals, these sites do offer opportunities for Net Gain.

Strategic approaches: SPA/SAC sites likely to require mitigation for these proposals are located across more than one local planning authority. Woolmer Forest SSSI/SAC/SPA and Shortheath Common SSSI/SAC lie within the boundaries of South Downs National Park, whereas Kingsley/ Broxhead Commons SSSI/SPA and Ludshott/ Bramshott Commons SSSI/SPA lie within East Hants DC.

This cross-border geography of the local heathland resource creates the opportunity to adopt a sub-regional, strategic approach to the mitigation of potential impacts on the SPA/SAC features through residential/recreational pressures.

Such an approach has potential to:

- (i) facilitate aspirations of both LPA's to deliver on Green Infrastructure strategies, including shared aims to link and enhance lowland heathlands and supporting semi-natural habitats
- (ii) build on existing arrangements for SAMM provided through S.106 agreements for the Prince Phillip and Louisberg/Quebec developments.
- (iii) coordinate cross-border provision of SANG and environmental enhancements through off-site Net Gain

Natural England Comments relating to EHDC Reg 18 Big Sites Consultation

EHDC have presented an analysis of constraints and opportunities of proposed allocations within the Site Assessments Background Paper Sept 2019. This Assessment has resulted in the selection of 10 sites that passed Stage 2 tests where they are judged 'Pass, there appears to be some scope for avoidance/mitigation of impacts'

The information provided by Site Promoters online and summarised by EHDC in the Large Development Sites Consultation for this consultation is at the same broad level that EHDC have used to select the 10 sites -in fact there is generally more specific environmental information used in EHDC's selection process than has been provided by Promoters for the Consultation.

Natural England is in agreement with the conclusions of the Site Assessment Background Paper that, for many of the sites, there are environmental issues and there appears to be scope for the mitigation or avoidance of environmental impacts. Table 9 could be amended to recognise the need for mitigation for European Sites for Northbrooke Park, Land SE Liphook and Extn East Horndean although this is recognised elsewhere and doesn't affect the conclusion. The recognition of a potential impact of nutrients on the Solent European Marine sites is very recent and there is a need for agreement which of the 10 sites may be affected and require mitigation. The necessity to go further to demonstrate a positive Net Gain to Biodiversity would benefit from greater emphasis in Site Assessments.

No further environmental information or assessment is provided to enable judgement at this stage whether sites should or should not proceed to Regulation 19 Sustainability Appraisal or Habitat Regulations Assessment: this work is still to be undertaken. Some proposed sites appear to have more challenging tasks in achieving mitigation of environmental impacts than others depending whether impacts are predicted on designated sites, SINCs or other environmental assets such as Ancient Woodland; however that is not to say a positive environmental outcome cannot be achieved should the Council wish to consider them further because of other sustainability advantages.

Further plan-level information and analysis is required for some of the proposed 10 Big Sites allocations to show that mitigation and Biodiversity Net Gain can meet policy requirements, Sustainability Appraisal and, where necessary, Habitat Regulations Assessment for the next Regulation 19 stage of the Local Plan Review as indicated in the table below. For these sites where appropriate

1. Natural England site visits for all proposed SANGs to assess their suitability to mitigate for recreational disturbance.
2. An outline of how a Net Gain in bio-diversity will be achieved, in broad terms
 - a. through the relationship between the development and any contribution it can make to the Green Infrastructure Strategy and Local Ecological Network and Ecological Capital (for climate change eg tree planting) in particular
 - b. where development proposes SANG on/or affecting SINCS, and/or where development impacts SINCS, Ancient Woodland or protected species and landscapes.

<p>Overview</p>	<p>European Sites are constraints for potential Big Sites within their Impact Risk Zones (IRZ) – Whitehill and Bordon is within the IRZ for the Wealden Heaths II SPA, Northbrooke Park for the Thames basin Heaths SPA and Land South of Winchester Road Four Marks and Land East of Horndean extension are within the nutrients IRZ for the Solent EMS (sites affected requires confirmation). By Reg 19 HRA mitigation for any risk of impacts of these Big Sites will need to be shown to be capable of being delivered to avoid an adverse effect on the integrity of these sites.</p> <p>All Big Sites allocations will be required to meet anticipated new policy to demonstrate, within a Mitigation, Compensation and Enhancement Plan, a contribution to a strategic delivery of a Net Gain to biodiversity taking account of SINCS, the LEN/NRN, ancient woodland, protected species, ecological capital for climate change and access and landscape.</p>			
<p>POTENTIAL BIG SITES</p>	<p>Constraints</p>	<p>What infrastructure is required?</p>	<p>Benefits?</p>	<p>X boundary issues?</p>
<p>Whitehill and Bordon</p> <p>SEE ADDITIONAL COMMENTS ATTACHED</p> <p>FURTHER WORK REQUIRED TO ASSESS SUITABILITY TO GO FORWARD</p>	<p>Within IRZ of Wealden Heath II SPA</p> <p>Potential adverse effect on integrity requiring effective mitigation</p> <p>The need to demonstrate the delivery of a Net gain to Biodiversity particularly given inclusion of SINCS and Broadleaved Woodland Woodland;</p>	<p>SANG and SAMM mitigation for recreational disturbance that can demonstrate it meets criteria required as well as a Net Gain to biodiversity.</p> <p>Delivery of mitigation in perpetuity.</p>	<p>Potential to deliver a Net Gain to Biodiversity benefit for this largely brownfield site may be readily achieved but needs to be demonstrated through further development of the application for the Reg 19 Sustainability Appraisal (SA)</p>	<p>Delivering SANG and Net gain in partnership with SDNPA</p>
<p>Northbrook Park</p>	<p>Within the IRZ of Thames Basin Heaths SPA</p>	<p>SANG and SAMM mitigation for recreational disturbance that can</p>	<p>Potential to deliver a Net Gain to Biodiversity benefit for this largely greenfield site</p>	<p>Partnership with TBH Partnership although the</p>

<p>FURTHER WORK REQUIRED TO ASSESS SUITABILITY TO GO FORWARD</p>	<p>Potential adverse effect on integrity requiring effective mitigation</p> <p>The need to demonstrate the delivery of a Net gain to Biodiversity : Adjacent to and includes SINC's and Broadleaved Woodland</p>	<p>demonstrate it meets criteria and a Net Gain to Biodiversity</p> <p>Delivery of mitigation in perpetuity.</p> <p><u>Initial comment:</u> The current proposed location of the proposed SANG and its isolated car park largely behind an employment site will detract from its potential landscape setting appeal and may cause safety issues that could deter use.</p>	<p>needs to be demonstrated through further development of the application for Reg 19 Sustainability Appraisal.</p>	<p>bespoke SANG, if meets criteria, is acceptable.</p>
<p>Land South east of Liphook</p> <p>FURTHER WORK REQUIRED TO ASSESS SUITABILITY TO GO FORWARD</p>	<p>Within IRZ of Wealden Heath II SPA</p> <p>Potential adverse effect on integrity requiring effective mitigation</p> <p>The need to demonstrate the delivery of a Net gain to Biodiversity : Adjacent to and includes and Ancient Woodland</p>	<p>SANG and SAMM mitigation for recreational disturbance that can demonstrate a Net Gain to Biodiversity.</p> <p>Delivery of mitigation in perpetuity.</p> <p><u>Initial Comment</u> There are concerns that the proposed SANG may not be appealing to daily dog walkers given the long 'out and back' walk down a narrow corridor of valley woodland. An alternative potential for SANG may exist in the area.</p>	<p>Potential to deliver a Net Gain to Biodiversity benefit for this largely greenfield site needs to be demonstrated through further development of the allocation for Reg 19 Sustainability Appraisal.</p> <p><u>Initial Comment:</u> The ability of the nearby Lynchmere Common SINC and LNR to be resilient to increased recreational pressure requires assessment.</p>	<p>Deliver net gain in partnership with the SDNPA</p>
<p>South of Winchester Road, Four Marks</p> <p>FURTHER WORK REQUIRED TO ASSESS</p>	<p>Potentially Within IRZ of Solent European Marine Site for Nutrients</p> <p>Potential adverse effect on integrity requiring effective mitigation</p>	<p>A Strategic Mitigation solution for allocations within the Test and Itchen River catchment of the Solent EMS is required.</p> <p>Delivery of mitigation in perpetuity.</p>	<p>Potential to deliver a Net Gain to Biodiversity benefit for this largely greenfield site needs to be demonstrated through further development of the</p>	

<p>SUITABILITY TO GO FORWARD</p>	<p>The need to demonstrate the delivery of a Net gain to Biodiversity of this largely greenfield site.</p>		<p>allocation for Reg 19 Sustainability Appraisal.</p> <p><u>Initial Comment:</u> The Biodiversity Strategy can be used as an evidence base. The valley is known for Dormice</p>	
<p>Land East Horndean ext (Hazleton Farm)</p> <p>FURTHER WORK REQUIRED TO ASSESS SUITABILITY TO GO FORWARD</p>	<p>Within IRZ of Solent European Marine Site for Nutrients</p> <p>Potential adverse effect on integrity requiring effective mitigation</p> <p>The need to demonstrate the delivery of a Net Gain to Biodiversity of this largely greenfield site.</p>	<p>A Strategic ‘nutrient neutral’ Mitigation solution for allocations within the East Hants River catchments and Budds farm STW catchment discharging to the Solent EMS is required.</p> <p>Delivery of mitigation in perpetuity.</p>	<p>Potential to deliver a Net Gain to Biodiversity benefit for this largely greenfield site needs to be demonstrated through further development of the allocation for Reg 19 Sustainability Appraisal.</p> <p><u>Initial Comment:</u> site is close to Havant Thicket Reservoir development and known for Ancient Woodland interest and Bechstein’s Bat.</p>	<p>Opportunity to work in partnership with Havant Borough Council in relation to Broad leaved Woodland and Bechstein’s bat.</p>
<p>Neatham Down, Alton</p>	<p>No significant environmental constraints</p>		<p>Potential to deliver a Net Gain to Biodiversity benefit for this greenfield site needs to be demonstrated through further development of the allocation for Reg 19 Sustainability Appraisal.</p>	

<p>Chawton Park, Beach, Alton</p> <p>FURTHER WORK REQUIRED TO ASSESS SUITABILITY TO GO FORWARD</p>	<p>The need to demonstrate the delivery of a Net Gain to Biodiversity of this largely greenfield site situated between Ancient Woodland and affecting SINCS</p>		<p>Potential to deliver a Net Gain to Biodiversity benefit for this greenfield site needs to be demonstrated through further development of the allocation for Reg 19 Sustainability Appraisal.</p>	
<p>South Medstead</p> <p>FURTHER WORK REQUIRED TO ASSESS SUITABILITY TO GO FORWARD</p>	<p>There is a need to confirm if this site is affected by Nutrient considerations of the Solent European Marine Site</p> <p>No other significant environmental constraints</p>		<p>Potential to deliver a Net Gain to Biodiversity benefit for this greenfield site needs to be demonstrated through further development of the allocation for Reg 19 Sustainability Appraisal.</p>	
<p>West Lymington Bottom Road Sth Medstead</p>	<p>No significant environmental constraints</p>		<p>Potential to deliver a Net Gain to Biodiversity benefit for this greenfield site needs to be demonstrated through further development of the allocation for Reg 19 Sustainability Appraisal</p>	
<p>Four Marks South</p> <p>FURTHER WORK REQUIRED TO ASSESS SUITABILITY TO GO FORWARD</p>	<p>The need to demonstrate the delivery of a Net Gain to Biodiversity of this largely greenfield site adjacent to SINCS</p>		<p>Potential to deliver a Net Gain to Biodiversity benefit for this greenfield site needs to be demonstrated through further development of the allocation for Reg 19 Sustainability Appraisal</p>	

From: [REDACTED]
Sent: 11 October 2019 10:54
To: [REDACTED]@networkrail.co.uk>
Cc: [REDACTED]@networkrail.co.uk [REDACTED]@networkrail.co.uk>; [REDACTED]@networkrail.co.uk>
Subject: FW: Local Plan Large Development Sites Consultation

Hi [REDACTED]

I hope you are well.

Sorry this is a bit last minute but I have been signed off following an operation so have not been able to do anything on this Local Plan consultation until now.

I have tried to open the online submission form using the link in the email from Heather Stevens (East Hampshire District Council) below but our system won't let me gain access. I also couldn't download the form.

I have explained to Martin Knowles (East Hampshire District Council) that the response will be a "strategic planner" response as we won't have time to canvas the wider organisation (unless you have already done so). I am also meeting Martin and Heather on Wednesday to talk in more depth about their Local Plan.

I will send a copy of my comments to East Hampshire District Council, via Martin and Heather, but I wonder if are you able to submit the official one through their system (I assume you have the permissions to access it)?

My comments are:

General

Network Rail is keen to work with local authority partners to understand the impact of housing development on the railway to ensure that rail forms an integral part of the infrastructure required to support housing and economic growth.

From a strategic rail perspective, in terms of capacity, there are several points that East Hampshire District Council should bear in mind when considering these 'Large Development Sites':

- In terms of 'on-train' capacity there is unlikely to be any requirement for additional trains to call at Alton to facilitate the movement of passengers from this station (unless there is an operational reason for doing so)
- Trains on the Alton Line begin to fill up from Farnham inwards and therefore any additional passengers from the 'Large Development Sites' along the Alton Line may contribute to 'on-train' crowding on services into and out of London Waterloo
- The Portsmouth Direct Line has over-crowding from around the Haslemere area so 'Large Development Sites' along this line could impact on this over-crowding

It is important that Network Rail is aware of and considers all such developments that may result in additional patronage on already crowded rail services to understand what wider investment, if any, is required. Understanding, from East Hampshire District Council, what percentage/ number of residents they expect to use rail services (particularly in the peak) and

where they expect them to travel will be important for Network Rail to assess the impact on our infrastructure.

There are some large scale schemes currently in the pipeline that may impact on services through the East Hampshire District Council area:

- Woking Area Capacity Enhancement – this scheme, as currently developed, is to provide a rail flyover that takes the line from Guildford up and over the South West Main Line at Woking Junction to remove conflicting train movements, improve performance and enable future growth in services (more trains). The scheme may also include an additional through platform at Woking Station. Some additional services unlocked by this scheme will call at stations in the East Hampshire District Council area. Network Rail are working with DfT to agree how this scheme can be funded but the current assumption is that delivery would be complete around 2027
- Farncombe to Petersfield Re-signalling – this scheme will see the upgrade of signalling infrastructure between Farncombe and Petersfield. Although not fully defined at this time the scope may include the upgrade/ closure of level crossings, improved signalling performance, potential additional infrastructure to enable trains to turnaround at Petersfield (subject to additional funding). This scheme is targeted for delivery towards the end of Control Period 6 (CP6 = 2019 to 2024)

In addition to the above there are also proposals to do the following in CP6 (subject to change dependent on emerging/ changing priorities):

- Further works to the embankment at Wrecclesham
- Closure of Level Crossings at Bentley
- Improvements to the footbridge at Bentley
- Track improvements through Buriton Tunnel

Large Development Site – specific comments

In relation to the sites at Chawton, Medstead and Four Marks, Network Rail has the following comments:

- Any additional passengers that these sites bring to the railway are likely to use Alton as their nearest station
- Alton currently has a 2tph service all day
- Alton Station has a fully accessible bridge
- There are discussions underway between Network Rail, South Western Railway, East Hampshire District Council and Alton Town Council to look at how improvements at Alton Station can be funded and progressed. These discussions will look at, amongst other things:
 - Station forecourt improvements
 - Improved car parking
 - Improved walking routes
- How these development sites might be able to provide funding towards improvements at Alton Station should be discussed and understood between Network Rail, South Western Railway and East Hampshire District Council
- How Alton Station can be better accessed via cycling and walking from the proposed sites should also be considered

In relation to the site at Northbrook Park Network Rail has the following comments:

- Any additional passengers that these sites bring to the railway are likely to use Farnham as their nearest station
- Farnham currently has 5tph in the peak and 2tph in the off-peak towards London Waterloo as well as 2tph services to Guildford
- Farnham Station is a partly accessible station
- Discussions will be required between Network Rail, South Western Rail and East Hampshire District Council to identify funding opportunities to improve accessibility at the station in light of the development site as appropriate
- How this development site might be able to provide funding towards general improvements at Farnham Station should be discussed and understood between Network Rail, South Western Railway and East Hampshire District Council
- How Farnham Station can be better accessed via cycling and walking from the proposed sites should also be considered

In relation to the sites around Whitehill & Bordon and Liphook, Network Rail has the following comments:

- Any additional passengers that these sites bring to the railway are likely to use Liphook as their nearest station
- Liphook currently has a 2tph service in the peak and a 1tph service in the off-peak
- Liphook Station is not an accessible station
- Discussions will be required between Network Rail, South Western Rail and East Hampshire District Council to identify funding opportunities to improve accessibility at the station in light of the development site as appropriate
- How these development sites might be able to provide funding towards general improvements at Liphook Station should be discussed and understood between Network Rail, South Western Railway and East Hampshire District Council
- How Liphook Station can be better accessed via cycling and walking from the proposed sites should also be considered

In relation to the site at Horndean, Network Rail has the following comments:

- Any additional passengers that this site may bring to the railway are likely to use Rowlands Castle as their nearest station
- Rowlands Castle currently has a 1tph service all day
- Rowlands Castle Station is not an accessible station (the nearest being Havant)
- Discussions will be required between Network Rail, South Western Rail and East Hampshire District Council to identify funding opportunities to improve accessibility at the station in light of the development sites as appropriate
- How this development site might be able to provide funding towards general improvements at Rowlands Castle Station should be discussed and understood between Network Rail, South Western Railway and East Hampshire District Council
- How Rowlands Castle Station can be better accessed via cycling and walking from the proposed sites should also be considered

As noted above, an understanding of potential increases to patronage figures is essential to fully assess the possible impact on Alton, Farnham, Liphook and Rowlands Castle stations. Network Rail and East Hampshire District Council are already working together to understand the impacts on rail that these developments may bring.

Thanks



██████████ | Senior Strategic Planner [Wessex] | ██████████
Network Rail | Floor 4, Missenden Suite (Suite 2) | Waterloo General Offices | Waterloo Station
| London | SE1 8SW

Consultation response NHS Property Services

[REDACTED]

Tue 15/10/2019 22:25

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Dear Sir/Madam,

I am writing on behalf of NHS Property Services with regards to the East Hampshire Large Development Sites consultation

I have attached our response for your consideration; should you have any queries please do not hesitate to get in contact.

Kind regards,

[REDACTED]

[REDACTED]

On behalf of

NHS Property Services Ltd
99 Gresham Street, London EC2V 7NG

[@NHSPROPERTY](#) | www.property.nhs.uk
Customer Service: T: 0800 085 3015 | E: customer.service@property.nhs.uk

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Sent as email to:

localplan@easthants.gov.uk

99 Gresham Street
London EC2V 7NG

Email: [REDACTED]
Twitter: @NHSPROPERTY
www.property.nhs.uk

Dear Sir/Madam,

East Hampshire Local Plan 2017 – 2036: Large Development Sites Consultation

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).

Foreword

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

Overview

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS support Clinical Commissioning Groups (CCGs) and Sustainability and Transformation Plan (STP) groups to consider ways the local health and public estate can be put to better use.

The NHS, councils and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across boroughs. A vital part of this is ensuring the NHS continues to receive a commensurate share of s106 and Community Infrastructure Levy (CIL) contributions to mitigate the impacts of growth and help deliver transformation plans.

Response to Large Development Sites Consultation

NHSPS acknowledges the council's requirement to deliver new homes within East Hampshire, however the future implications large-scale developments will place on existing primary healthcare infrastructure must be properly considered.

Large residential developments often have very significant impacts in terms of the need for additional healthcare provision for future residents, meaning that a planning obligation requiring a development delivers a new healthcare facility is necessary. Development plan documents and planning policies must recognise this and set appropriate expectations for either the delivery of new facilities or the need to secure CIL funding to help deliver required facilities or expansion. This will ensure that health is appropriately recognised, while helping to facilitate conversations between local planning authorities and the NHS when securing necessary funds to support planned growth.

The National Planning Policy Framework 2019 is clear that 'Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure and community facilities (such as health).' Paragraph 34 goes on to state that 'Plans should set out the contributions expected from development.' Alongside this, they should include the levels and type of infrastructure required over the plan period. It is not apparent that the Large Development Sites document does or considers this for health.

NHSPS have also reviewed the adopted CIL 123 list, which identifies the types of infrastructure to which CIL funds would contribute. These include strategic highway improvements, school places, **health facilities**, strategic green infrastructure and leisure and community facilities. All of these types of infrastructure have been promoted by the various site promoters as 'suggested infrastructure', apart from health. Furthermore, the Infrastructure Delivery Plan 2019 only identifies a New Health Campus as part of the new town centre at Whitehill & Bordon. It would be helpful if the Large Development Sites Consultation proposal set out how planned growth intends to contribute towards new or expanded health facilities across the district, either financially or in kind.

It should be noted that NHSPS are the freehold owners of Chase Community Hospital (amongst other facilities across the district), which is in close proximity to Whitehill and Bordon large development site, seeking to deliver approximately 1,284 new homes.

Whilst it is understood that new healthcare facilities are planned in the Whitehill and Bordon area, it is unclear from the site proposal when, how or in what capacity these will be delivered. The proposed additional housing growth is likely to place pressure on existing health facilities, and this should be a consideration of any site proposal. In spite of this, the social and physical infrastructure being proposed by the site promoter does not include the delivery of new or improved healthcare infrastructure, only education places. Healthcare facilities are not discussed.

Across all ten large scale development site proposals, health has not been mentioned, despite an anticipated increase of a minimum of 600 new homes per site. As such, in line with the increase in population that is expected to arise from the large-scale developments, it is only appropriate that sufficient consideration is given to the future implications on health infrastructure and services needed to alleviate anticipated pressure or improve health infrastructure as part of any of the site proposals.

In addition, NHSPS suggest that when setting planning development policies, councils should seek to address strategic as well as local infrastructure priorities. The significant cumulative impacts of smaller residential developments should also be recognised, and health facilities should be put on a level footing with affordable housing and other community infrastructure such as educational facilities, given their strategic importance, when receiving funds.

Summary

For the reasons identified above, it is currently unclear how healthcare is intended to be funded. Site promoters and developers must consider the health impacts of their proposed developments from the outset supported by development plans documents. Whilst the 123 list includes health, strategic policies and allocations must also reflect this need if facilities are to be funded and constructive conversations are to be had between the NHS, developers and local authorities.

It is imperative that planning policies are positively prepared, in recognition of their statutory duty to help finance improved healthcare services and facilities through effective estate management. We therefore suggest that the Large Development Sites document sets out healthcare infrastructure considerations, to ensure constructive conversations can take place as sites come to fruition.

Yours sincerely,


Town Planner

RE: Large development sites



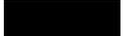
Tue 15/10/2019 14:28

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (208 KB)

EHDC Local Plan Questionnaire large development sites for web.docx;

Please see attached objections to the proposed large site development

 | Dormouse and Training Officer | 020 7062 8619

People's Trust for Endangered Species | 3 Cloisters House | 8 Battersea Park Road | London | SW8 4BG

www.ptes.org

[Facebook](#) | [Twitter](#) | [YouTube](#) | [Instagram](#) | [[linkedin.com/company/people-s-trust-for-endangered-species](https://www.linkedin.com/company/people-s-trust-for-endangered-species)]LinkedIn

[Get your Wildlife Friendly Garden Kit by donating here](#)

People's Trust for Endangered Species is a registered charity, no. 274206.

Tel: 020 7498 4533 email: enquiries@ptes.org

If you ever wish to change the way we communicate with you please let us know by phone or email

Large Development Sites

(REGULATION 18)

CONSULTATION QUESTIONNAIRE

3 September – 15 October 2019



East Hampshire Local Plan Large Development Sites

This questionnaire has been prepared to assist you in responding to the consultation and should be used alongside the Large Development Sites consultation document and the Why, when and how to get involved guide.

Please note that the Council is unable to accept anonymous comments and for a comment to be formally accepted, a name and contact address (preferably e-mail) must be provided. Comments to this consultation are part of the evidence base which supports the emerging Local Plan. As such, all comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website. Your comments will be made publicly viewable at the appropriate time.

If you wish to be kept updated about this consultation and other Local Plan matters, please register for email alerts via our website.

Name

Organisation (if applicable)

Email (preferred method of contact)

Address Line 1

Post Town

Post Code



To be completed by agents acting on behalf of a client

Client Name

Client Organisation

Client Email

Client Address Line 1

Client Post Town

Client Post Code



How to respond using this form

Please refer to the ***Why, when and how to get involved*** guide available on our [website](#).

When responding, please include the name of the site your comments refer to. If commenting on more than one site, please make it clear which comment relates to which site.

There are a series of consultation questions. These are:

- 1: Do you have any comments on the proposed uses?
- 2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.
- 3: Do you know of any other constraints to developing the site? Please provide detail and evidence.
- 4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.
- 5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036.

- 6: Is there any reason that this is not achievable?
- 7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?
- 8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper? <link>
- 9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?
- 10: Is there any feedback you would like to give us about this consultation?



Large Development Sites

When responding to a consultation question please quote the question number from the list provided and where applicable, the site name.



Please provide your comments in the box below. Use additional sheets as required.

Click here to enter text electronically

██████████ in the first instance I would wish to object about the four planning applications that are within that area as I am more familiar with the likely impacts. These are:

Four Marks South

South Medstead

Land west of Lymington Bottom Road Xxx

Land South of Winchester Road, Four Marks

Four Marks has seen much recent development, much of it piecemeal, and has exceeded its quota for new housing. The area does not have the capacity or infra structure to support substantial new housing developments. The road network, specifically the A31 and its junctions are over capacity and the lanes in the area are already having to take both size of vehicle and volume that they were not designed for.

On wider issues I wish to object to all 10 planning applications on the grounds as they will not, in any way, contribute to the government's plan to make the UK carbon neutral by 2050. These sites are:

Whitehill & Bordon

Land South East of Liphook

Extension to Land East of Horndean (Hazelton Farm)

Northbrook Park

Chawton Park

Neatham Down

Four Marks South

Land South of Winchester Road, Four Marks

South Medstead

West of Lymington Bottom Road,

South Medstead

These dwellings will not be carbon neutral nor is there any provision to either greatly reduce their carbon footprint or the carbon footprint of the future occupiers. For example:

- *Will all the houses be timber framed to lock away carbon and will they be built using limited, or no, concrete in their construction?*
- *Will all dwelling have solar panels on the roof?*
- *Will all dwellings have a grey water separation system?*
- *Will all homes have low-carbon heating systems, in particular air-source heat pumps,*
- *Transport currently accounts for 34% of a household's carbon footprint. Will the dwellings have a covenant attached that restrict the owners to having electric vehicles or no vehicles?*



Click here to enter text electronically

- *Will a cycleway to the local school be installed?*
- *Will cycleways to Alton and Winchester be installed? (It is noted that one of the plans offers all new homeowners a bicycle – that will not encourage cycling on increasingly crowded roads; it just means that there will be more bikes for sale on eBay)*
- *The nearest hospitals are in Basingstoke and Winchester; will public transport be improved so that people are not required to drive there (already the parking at Winchester is unable to cope)*
- *Will public transport in general be improved*

At the time when Hampshire County Council has declared a 'Climate Emergency it is appalling, that we continue to even consider such developments as 'business as usual'. These plans will give a considerable financial benefit to a few individuals and companies, but no benefit to local community.

SUBMISSION

Please submit your comments to reach us by midnight on 15 October 2019 either by:

- E-mail to localplan@easthants.gov.uk
- By post to Planning Policy, East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

Thank you for taking the time to have your say.



Representation received. ID:28005

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 12:13

To: [REDACTED]

Portsmouth Hospitals NHS Trust,

Your representation has been received.

ID: 28005

Type: Comment

Document: Large Development Sites

Section: HD1: Do you have any comments on the proposed uses?

Summary:

Full Text:

The creation of new dwellings places additional pressure on local NHS health services. Due to the potential locations proposed and the nature of services delivered by local acute Trusts, historical data evidences that many residents will access treatment at Portsmouth Hospitals NHS Trust.

We would therefore like the Council to clearly articulate within the Draft Local Plan, Supplementary Planning Documents, and other relevant policies, a requirement that developers will support healthy sustainable communities through making both CIL and S106 contributions for health services, including hospitals.

RE: East Hampshire District Council Local Plan (Large Development Sites Consultation)

Catchment_Management <catchment.management@portsmouthwater.co.uk>

Mon 14/10/2019 14:27

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [REDACTED]@portsmouthwater.co.uk>; [REDACTED]@portsmouthwater.co.uk>; [REDACTED]

[REDACTED]@portsmouthwater.co.uk>; [REDACTED]@portsmouthwater.co.uk>; [REDACTED]

[REDACTED]@portsmouthwater.co.uk>

📎 1 attachments (714 KB)

EHDC Local Plan (Large Development Sites Consultation)- PW consultation response.pdf;

Dear Sir/Madam,

Thank you for consulting Portsmouth Water on Large Development sites consultation, please see attached our formal consultation response which is a collective response from Water Resources, Water Quality and Havant Thicket Winter Storage Reservoir (HTWSR) project team.

Please do not hesitate to contact us if you have any queries.

Many thanks

Kind regards,

[REDACTED]

[REDACTED]

Catchment Management Officer
Portsmouth Water

Direct [REDACTED]

Email: [REDACTED]



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RoSPA 2019 President's Award Winner

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11/14/2019

Mail - Woodgate, Jenny - Outlook

Registered Office: Portsmouth Water Ltd, P.O. BOX NO.8, West Street, Havant, Hampshire. PO91LG. Telephone (02392)499888. Fax (02392) 453632. Registered in England No 2536455. VAT No. GB 615375835.



Registered Office:
Portsmouth Water Ltd
PO Box 8
Havant
Hampshire PO9 1LG

Tel: 023 9249 9888
Fax: 023 9245 3632
Web: www.portsmouthwater.co.uk

Consultation on the East Hampshire District Council Local Plan (Large Development Sites)

The consultation focuses on 10 large strategic sites which could be allocated in the new Local Plan in line with its emerging spatial strategy. Comments are being sought on each of the sites to help inform the decision about which sites to allocate within the Proposed Submission Local Plan (Regulation 19).

Our comments are focused on the large development site located in the southern part of the District; the Extension of Land East of Horndean (Hazelton Farm). We have aligned our comments with the consultation questions provided for this consultation.

Consultation questions for each site (below answers are in relation to the Extension of Land East of Horndean (Hazelton Farm)):

1. Do you have any comments on the proposed uses?

- This site lies above a chalk aquifer from which water used for the public drinking supply is sourced. Therefore, consideration must be given to the protection of groundwater from pollution (chemical storage, fuel storage, waste water disposal and site run off).
- There are around 1,000 new homes being proposed for the site. We would expect that due consideration should be given to ensuring these are water efficient and they meet the requirements of the resource efficient design policy as set out in the council's own Draft Local Plan (standard of 100 litres/head/day if feasible) put in place in response to water scarcity, environmental and bill affordability pressures. Portsmouth Water would welcome the opportunity to discuss options to achieve these standards as this development has the opportunity to become an exemplar site.
- For the employment land we would wish to be consulted at the design stages regarding the development that will be undertaken on this land so we can inform the layout and design to ensure the protection of groundwater quality.

2. What infrastructure is required to support the proposal and when? This could be on or off-site provision.

- Provision of groundwater protection measures to prevent the pollution of the groundwater through site activity. The specific infrastructure required will ultimately depend upon final use of the land and we would welcome an ongoing dialogue through the design of the project in order to facilitate this can be achieved.
- The type of infrastructure that might be considered is likely to include SUDs, isolated drainage areas, covered storage areas etc.
- In order for the site to be considered an exemplar, consideration might extend to rainwater harvesting or grey water recycling.

3. Do you know of any other constraints to development the site? Please provide detail and evidence?

As discussed in the previous response, the chalk that underlies the southern part of the District is designated as a **Principal Aquifer**. It provides groundwater resources for the public water supply. Therefore it is key that the appropriate assessments and mitigation of the risks to groundwater quality are considered throughout the design and development of this site. There is a high risk to the Principal Aquifer particularly in the area south of Horndean because of the presence of solution features. If the LPA are minded to support inclusion of this site in the Local Plan it would be important for site investigation to take place to refine the risk before the development layout is determined.

4. What opportunities and/or benefits do you think the proposal could bring. Please explain how.

- Portsmouth water would hope that the site could become an exemplar for the small scale of its water footprint.
- Efficiency by design is always cheaper than retro fitting efficiency at a later time. Consideration now of water efficiency house and building design, plus the possibilities of community scale rainwater harvesting or grey water recycling could combine to make the site an exemplar.
- Use of water in the home is also a major contributing factor of a household's energy footprint¹. Therefore Water efficiency also drives significant Carbon reduction as well as reducing both water and energy bills to households.

5. What are the cross-boundary considerations and the potential implications? How can they be overcome?

- Proximity of the site to the safeguarded Havant Thicket Winter Storage Reservoir Site. Further comments are provided after Question 10.

¹ <https://www.energysavingtrust.org.uk/home-energy-efficiency/saving-water>

6. The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036. Is there any reason that this is not achievable?

No comment

Other questions:

7. Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?

No comment

8. Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper?

- Water is a precious resource for many sectors, not just the public water supply. Over 90% of the drinking water supplies by Portsmouth water (and >75% of the drinking water supplied across the Southeast Region) comes from groundwater sources.
- By its very nature, groundwater is out of sight and therefore mostly out of mind. As such it is vulnerable to inadvertent pollution, often through ignorance or poor infrastructure design. Once polluted groundwater is extremely hard and expensive to decontaminate.
- In order to remove the risk of inadvertent pollution of groundwater, the benefit / risk assessment process used for identifying large development sites should include their location in relation to groundwater sources of public drinking water. For example, the part of Extension of Land East of Horndean (Hazelton Farm) site is located in Source Protection Zone One (SPZ1) (see Appendix A), where there is a greater risk to the Principal Aquifer and this should be a material planning consideration.
- Vulnerability maps for public water boreholes are freely available through water companies and we would push for all major development sites to be outside a "Source Protection Zone 1" (the most vulnerable locations) for the protection of groundwater quality. Portsmouth Water would be keen to engage with you on this consideration for the assessment of planning development locations if it would be of assistance.

9. Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposal the draft Local Plan should contain?

- The existing strategic policy S26 includes the requirement that development proposals not lead to the deterioration in the quality or quantity of a groundwater resource. Portsmouth Water support this strategic policy and will support the authority to see that the requirement is rigorously applied for new large development sites.
- Existing development policy DM28: Resource Efficient Design is also of high importance for large development sites. We fully support this policy in regards to the higher water efficiency requirements, which are in line with our aspirations to reach a per capital consumption (PCC) level of 100 litres/head/day by 2050.

- Technology and experience in this field is improving all the time and we consider it should be feasible for all new buildings, especially large developments, to meet this water efficiency standard.
- Portsmouth Water would also be able to assist developers within our supply area via a 50% allowance on infrastructure charges if a developer customer can provide evidence of intention to build a level of 100 litres per head per day, or less.

10. Is there any feedback you would like to give us about this consultation?

No comment

Havant Thicket Winter Storage Reservoir (HTWSR)

Safeguarding the HTWSR site and avoiding conflict

The HTWSR is safeguarded in both the East Hants District Council and Havant Borough Council Local Plans as a strategically important water resource and green infrastructure site. Both LPA's and local stakeholders have emphasised the need to ensure that the rural character of the area is maintained. This requirement will be increasingly challenging to deliver if further urban development is allowed to encroach beyond the existing permitted development boundary.

The proposed extension to the Land East of Horndean (LEOH) development is located immediately adjacent to the land that has been identified for part of the reservoir ecological mitigation and compensation strategy and could potentially prejudice that strategy. We are currently working with Forestry England, Natural England and the LPA ecologist to ensure delivery of a robust strategy that not only takes into consideration protected species but also recreational access. We are currently pulling together information to support a planning application for the reservoir in 2020 and recognise that there may be opportunities for collaborative working with the LEOH developer. Such matters could include the access road to our proposed reservoir visitor centre, green infrastructure / recreation strategy and the mitigation and compensation strategy for protected and notable species.

Protected species including Bechstein's bat

The LPA will be aware that Portsmouth Water have been carrying out extensive ecological survey work in the local area in relation to the proposal to develop a new reservoir at Havant Thicket. Our survey work has identified the presence of a population of the rare Bechstein's bat *Myotis bechsteinii* utilising an area which roughly extends from Southleigh Forest in the south to Blendworth and Wick Hanger in the north, including The Holt woodland and suitable habitat at the LEOH.

Bat radio tracking studies from the past 10 years in relation to Portsmouth Water's reservoir proposals and studies from other development proposals in the local area in recent years, have highlighted that the species forages and commutes over a variety of habitats within the local area including, but not limited to ancient semi-natural and secondary woodland, parkland, open grassland and hedgerows.

Roosts have been located within mature and semi-mature trees in a variety of habitats. In addition, we have identified the presence of other protected and noteworthy species, including, but not limited to, hazel dormouse *Muscardinus avellanarius* and great-crested newt *Triturus cristatus*.

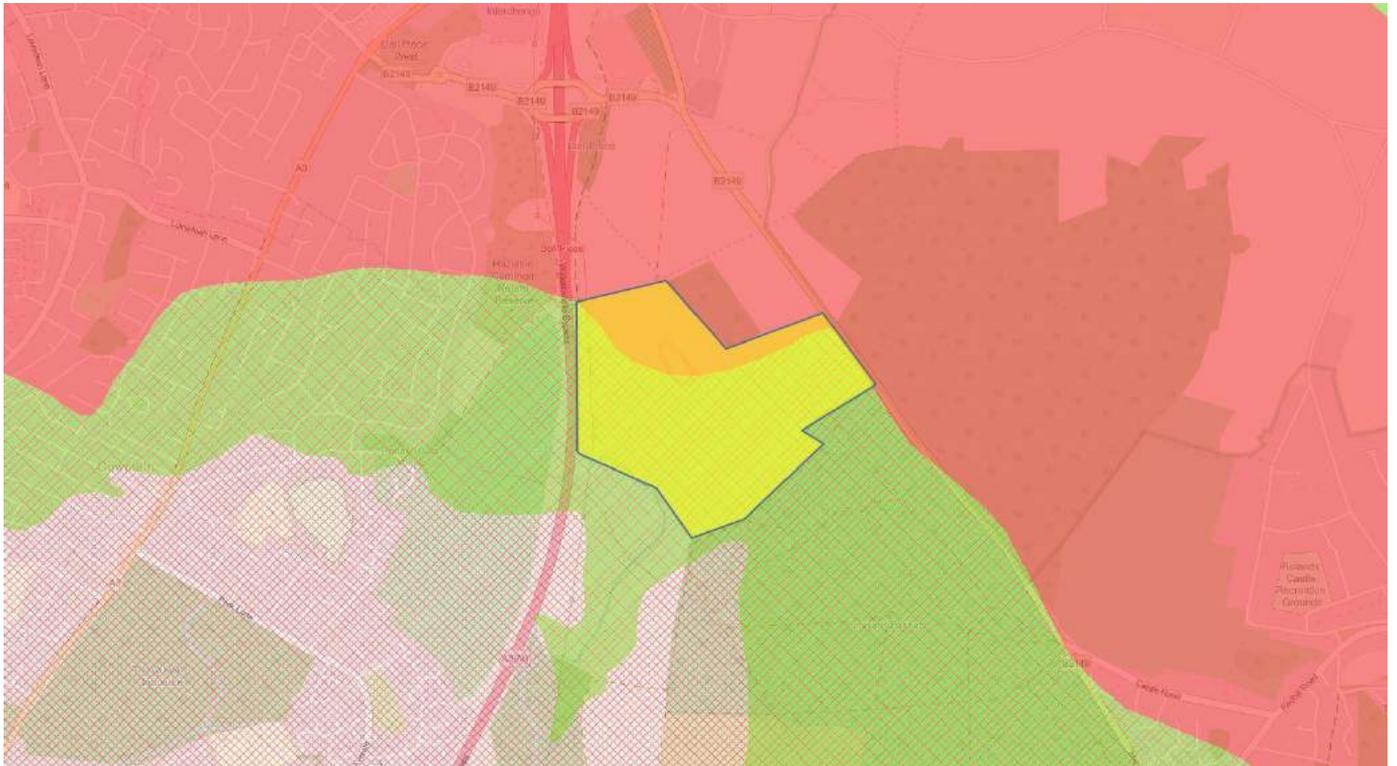
Portsmouth Water is concerned that any fragmentation of habitats as a result of any new development in the local area could significantly impact the Bechstein's bat and other rare and noteworthy species. Therefore we consider that any new development proposals must consider impacts in combination with our reservoir proposal and any mitigation or compensation strategies must work in partnership with our project in order to ensure that they are robust and effective. In addition to protecting the existing habitats concerns would relate to closer proximity to increased lighting, noise and the additional human and pet activity associated with a further 1000 houses, gypsy and traveller land, on top of the 700 to 800 already allocated very close by.

Opportunities for improved public access

We have previously drawn the LPA's attention to the 2008 HTWSR public consultation feedback received in relation to the need to improve public recreational access between Horndean and Havant Thicket. We welcome that the developers pack page 7 makes reference to "safeguarding of links to the allocated Havant Thicket Winter Storage Reservoir" and illustrates three potential links into Havant Thicket on the opportunities map (page 6). The increased public access provided by three new routes into Havant Thicket could be considered detrimental to biodiversity within the woodland. Portsmouth Water would welcome the opportunity to work with the developer of LEOH to develop a more appropriate strategy for access.

Page 12 of the prospective developers pack refers to the 'opportunity' for new pedestrian links between the existing and planned residential areas and from these areas to the South Downs National Park and across the A3(M). This would be welcome, but the current opportunities plan (page 6) does not show a direct connection between the proposed new paths on the extension site and the public access bridge over the A3(M). This may be an oversight. If the LPA were minded to include an extension to LEOH in the Local Plan it is important that the LPA, developer, Forestry England, HCC access team and Portsmouth Water work together to develop a proposal that improves public access for pedestrians, cyclists and horse riders in a way that does not prejudice the development of a robust protected species /habitat mitigation and compensation strategy for the strategically important planned reservoir site.

Appendix A- Extension of Land East of Horndean (Hazelton Farm) and the Groundwater Source Protection Zone catchment



Extension of Land East of Horndean (Hazelton Farm) - yellow area with blue outline. Source Protection Zone One (SPZ1) - red area. Source Protection Zone Two (SPZ2) - green area.

Large Sites Consultation



Mon 14/10/2019 15:50

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

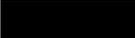
📎 1 attachments (44 KB)

EHDC Large Site Consultation (005).docx;

This email is being sent on behalf of Ropley Parish Council in response to EHDC's Large Sites Consultation 2019.

This attached response has been written following detailed consideration of all the possible sites. This response takes into consideration the perceived constraints, opportunities and benefits of each site. For each site we have identified whether we support or object to the application and the reasons for our decision.

Each site has been considered separately and as a result the report is formatted with one site per page.

Regards 

Chair of Ropley Parish Council Planning committee

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COMMENTS FROM ROPLEY PARISH COUNCIL

NEATHAM DOWN – Support

With considered and sensitive design, the Greenfield Site outside the Settlement Policy Boundary at Neatham Down could offer housing that has a Low Visual Impact on the town of Alton whilst delivering housing that is closely integrated with an existing local Employment opportunity. Alton is a prime location for development; it offers sustainable public transport to Winchester, Basingstoke and Farnham by established Bus Routes and rail links to Woking and London Waterloo stations reducing the dependency on single occupancy vehicles.

The site lies adjacent to the A31, which at this location, is a full dual carriageway in both directions North East and South West. The Neatham Down site would be directly accessed from an existing Roundabout at the A31 / B3004 Junction following the introduction of a new single exit heading East. Some concern was voiced on the lack of a second exit to the A31, but without the introduction a new Roundabout or additional access ramps to the South of the development, little other options appear to be available. The proposal also offers separate non-vehicular access into Alton via a proposed joint cycle and walking route picking up on various local employment centres offering high sustainability for the development.

Developed on a single contiguous parcel of Land to the East of Alton offers significant benefits to existing areas of Employment boosted with onsite Employment opportunities will also minimise disruption and impact on adjacent built up areas. Sites of Employment in Alton include the Mill Lane Industrial Estate, main High Street Shops & Offices. Excellent existing Schools and HE College are within walking distance, further enhancing the additional proposed infrastructure links.

Existing Shops will benefit from the additional Housing, securing jobs and ensure their continued success. These include three major Brand Supermarkets, High Street Banking and a developed mixed-use town centre. New Leisure Facilities currently under development and established parkland and sporting fields are also close by.

SOUTH MEDSTEAD – OBJECT

The site is comprised of at least four parcels of land accessed off a mix of unclassified Rural Roads (Five Ash Road, Lymington Bottom Road and Soldridge Road) – wholly unsuitable for the number of Residential Properties proposed in this proposal, and the A31 (Winchester Road). Regardless of the type of Road, the proposal relies upon distributing a large number of residential vehicles from the site, and this would inevitably result in the A31 Winchester Road becoming further congested not only during rush hours but also throughout the construction period. Access to the A31 is further restricted by the single width Rail Bridge located on Lymington Bottom Road and the junction with the A31. The A31 at this location is also limited to 30mph and single width, further reducing capacities through the already busy Four Marks. Due to the geographical location, a very large proportion of the traffic generated by this site will be diverted to the A31, either directly from Lymington Bottom Road (under restricted width Rail Bridge), Soldridge Road / Grosvenor Road (under restricted width Rail Bridge, and with poor visibility access onto A31) or Five Ash Road / Boyneswood Road (over restricted width Rail Bridge).

The site fundamentally changes the local character of the area. The majority of the existing Development in the area is linear in nature, this development seeks to create infill areas and change the historical land use. The proposal also hinges on complete reliance on personal transport, no additional Public Transport is identified within the scheme, and leverages existing links to Four Marks centre. Four Marks and Medstead historically have limited employment opportunities and this scheme adds very few to that number, this in effect creates a complete dormitory development. Public Transport is currently only available from the A31, a distance from the development making it unlikely to appeal commuters.

The primary source of Sewage Treatment in the Medstead area is Septic Tank and Soakaway. Without connection to mains sewage, a development of this size will prove difficult to engineer and comply with current Nitrate regulations. Whilst a new Primary School being proposed in this scheme should be encouraged, delivery at the end of the project from Year Eight onwards should be discouraged. Current School provision at Medstead and Four Marks is already limited. Any development should deliver a Primary School earlier in the plan, to ensure that further Vehicle Trips to neighbouring villages are minimised.

Local Facilities are also lacking. The development in South Medstead relies on the facilities offered in Four Marks and Medstead. Whilst these are relatively local, they are limited to small retail units, such as Tesco, Co-Op and M&S local type units. These are totally unsuitable to support such a development and the nearest large Supermarket stores are approximately 5 miles away in Alton. Without Public Transport serving the various sites directly, this would result in increased vehicle movements. The South Medstead Large Site is completely unsustainable and should be avoided.

WHITEHILL & BORDON – SUPPORT

The proposed development at Whitehill & Bordon builds on the existing function of the current HPA that is delivering 2,400 dwellings and will be predominately built over already existing developed land or Brownfield sites. The adjacency to the current Prince Philip Park development ensures that the addition of the proposed expansion is delivered in a sustainable manner which aligns with and enhances the aims of the preceding policy. Rather than define new areas for development, the plan proposes the intensification of areas that ensure the continued success of the additional Shops and Leisure Facilities securing Employment opportunities.

Employment is further enhanced with the provision of an additional 16,000sq.m of space, the size of which is eminently supported by the existing development and the adjacency to the existing built environment.

The development is built along and adjacent to the upgraded A325 Trunk Road that has been designed to modern standards and is suitable for the proposed development capacities. The A325 distributes traffic North and South to other major highways, the A31 and A3 respectively, this adjacency offers options for vehicle traffic. However, the lack of adjacency to a mainline station does minimise sustainability. Stations are available 11.4 mile to the North at Bentley and 12.3 miles to the South at Liphook both of which link into London Waterloo and south from Liphook to Portsmouth and the south coast following the A3. Strong consideration should be given to improving the A325 south between Whitehill and Bordon and the A3, as the A325 route north is constrained by existing development.

Local Facilities include two large supermarket chains and other ancillary options reducing the impact to journeys over 2miles for basics or weekly shop.

NORTHBROOK PARK – SUPPORT

This is an intriguing proposal to build a new Village on the Hampshire / Surrey border providing new homes and employment with good infrastructure links from Bentley and Farnham into London Waterloo. Built in open countryside, the development would provide a modern village setting with new facilities and a Village Trust, fully funded in perpetuity upfront by the landowner, to manage community assets including village bus services, village hall, work hub, local pub, village stores and shops.

Transport would primarily be provided by the A31 which dissects the development. The major towns of Alton and Farnham would provide Employment Opportunities and links to London via Bentley and Farnham mainline stations, with a journey time of under one hour from Farnham. The 65 bus route passes the site and connects Guildford to Alton via Farnham, where connections can be made to other transport services. A Trust managed Bus Service will provide alternative options for accessing adjacent towns and their Leisure and Shopping Facilities. Enhanced Foot and Cycle paths will further support the sustainability of the development both in and outside Northbrook Park.

The site will also ensure the creation of a new Primary School for the Village. This will support the needs of the village. However, it should also be noted that, sited as it is alongside the County Borders, there could be issues around any future expansion of the Village. We would strongly resist further development to the West towards Bentley and argue that the Landscape in the area continues to be considered valuable and the Planners note this and take mitigating steps.

LAND SOUTH OF WINCHESTER ROAD, ROPLEY & FOUR MARKS – OBJECT

The proposed site off Winchester Road is primarily within the Parish of Ropley and has failed on a number of aspects to meet the criteria within the Ropley Neighbourhood Plan (RNP) which was Made on 19 September 2019. Any proposed site lying within the Ropley Neighbourhood Designation Area should be measured against the criteria within the RNP.

RNP1: Development proposals should ensure the retention of the open character between Ropley and Ropley Dean and between the two separate settlements and other groups of dwellings in the neighbourhood area. Proposals for the re-use of rural buildings, agricultural and forestry-related development, playing fields, other open land uses and minor extensions to existing dwellings in such parts of the neighbourhood area will be supported where they would preserve the separation between the two settlements and the settlements and the other groups of dwellings concerned and retain their individual character and appearance.

The proposed site creates a coalescence between Ropley and the neighbouring village of Four Marks and impacts the open land between the two villages. This site should be refused on the basis that it fails to meet RNP1.

RNP3: Key Vistas and Areas of Significant Visual Prominence are shown on the Proposals Map. Development proposals should conserve and where possible enhance the visibility of the South Downs National Park from the neighbourhood area. Where appropriate, development proposals should take account of the identified Key Vistas and Areas of Significant Visual Prominence in terms of their location, design, massing and appearance. Development proposals that would have an unacceptable adverse impact on the visual appearance or character of an identified Area of Significant Visual Prominence or on an identified Key Vista will not be supported.

The majority of the Proposed Development lies within the Key Vistas and Areas of Significant Visual Prominence as identified on the Proposals Map on page 27 of the RNP. Clearly the size of such a development will have impact on these views and should be refused on the basis that the Massing, Location and Design of this Development will be unacceptable. As the site levels rise 35 metres from its lowest point, screening is not possible. Despite its distance from the boundary, its long distance visibility from the South Downs National Park combined with the inevitable difficulty to screen such a size of development also detracts from its suitability as a location.

RNP4: New development should retain existing mature trees, hedgerows, verges and banks which contribute to the amenity of the area. Any new landscaping associated with the new development should be of indigenous species.

Although the development has yet to go to detailed design, the proposed area takes in a considerable number of mature trees and hedgerows which will be impacted by this proposal. As such, we would request that the proposal be refused.

RNP5: Development proposals should respect the character and appearance of narrow lanes within the neighbourhood area. Development proposals which would detrimentally affect the character of a narrow lane or introduce an unacceptable amount of additional vehicular traffic will not be supported.

Parts of the proposed location for this development include narrow Lanes, most notably Gravel Lane. Any development of this size would undoubtedly introduce unacceptable levels of additional vehicular traffic that would impact the Rural Character of the lanes. Additionally the Gypsy &

Traveller and Showpeople sites appear to be accessed from Grosvenor Road which is a single vehicle width narrow lane – clearly unsuitable for access for the large vehicles used by showpeople.

RNP8: The assets shown in Appendix 3 and on the Proposals Map are identified as important heritage assets. Development proposals should retain the significance of these assets including their contribution to local distinctiveness. Proposals for demolition or alterations to the asset or development within its setting will be assessed as to the extent of the harm to the significance of the asset.

The RNP developed a robust Site Assessment process which is available within the evidence base and supporting documents. The combined areas of the proposed site would fail this process on the basis of its prime Agricultural Value. The agricultural land on which most of the constituent sites lie in this proposal provide rainwater to the River Itchen and consequently there will be an inevitable impact of Nitrates on the viability of the River Itchen.

The proposal has an impact on NDHA22, 23, 24 and the wider setting of the Watercress Line which lies largely on an elevated embankment along the Northern boundary of the site. The Watercress Line is a rural branch line that has unobscured views over Hampshire Countryside. The entire Development would be visible from trains between Ropley Station and Four Marks Station. Additionally, the TP & TSP proposed location lies beneath the line adjacent to Gravel Lane.

The Site offers no improvement to the current A31, which is a very limited length dual lane carriageway split by a wide grassed verge and is situated across both side of the road across four main parcels of land. The Land to the South of the A31 will make it difficult for those wishing to head North on the A31 and those situated North of the A31 will find it difficult to head South. Essentially, access to highways across all the sites is poor and appears to be dangerous. On these grounds, we consider the location of the site wholly impracticable and should be refused.

The proposal offers minimal Employment opportunities and ensures that the development will create unacceptable levels of new vehicle movements and create a dormitory environment. Lack of any cohesive plans for additional public transport will encourage the reliance on personal transport. The closest Rail Stations are Alton and Winchester some 8.3 miles and 11.9 miles respectively. The location of this proposal should be considered unsustainable development in respect of travel and personal transportation.

The proposed development would increase the population of Ropley parish by approximately 75% and would fundamentally alter the structure of the community yet the development plan offers no additional public facilities within the Parish of Ropley, but seeks to add a small amount to the existing facilities in Four Marks following other Winchester Road developments. This is a bare minimal investment from the development team and falls short of the requirements following the uncontrolled development in recent years and should be considered as unacceptable.

The Winchester Road development seeks to provide a replacement Primary School for the existing Four Marks C.E which is located at the corner of Hawthorn Road and Kitwood Road. Whilst not centrally located, Hampshire County Council have recently committed development funds to expand the school to ensure that it meets the needs of the historically uncontrolled development. Relocation of the school may make sense at a transport level but is a gross waste of public funds as delivery of the proposed school is at the end of the scheme, clearly following completion of HCC current proposals scheduled for post Summer 2020.

FOUR MARKS SOUTH – OBJECT

The development here in Four Marks South is unacceptable on a number of levels. It comprises a complex mix of five Developers who have acquired mixed parcels of Farm Land and Back Land to extend Four Marks considerably South towards the South Downs National Park. The A31 in Four Marks has already taken substantial additional traffic at peak hours following the uncontrolled development in recent years without any significant improvements. It is limited to a Single Lane with extensive 30mph speed limitations and this development has no direct access to that road, but will add considerable additional traffic to that main road.

The development will rely completely on existing residential side roads including primarily Alton Lane and then smaller arterial roads of Lymington Bottom and Gradwell Lane to the South and Telegraph Lane to the North. All of these Lane have already taken historical development, which already result in traffic congestion whilst waiting to access the A31.

The plan for this site offers no additional Travel options or integrated travel plans. It relies on existing Public Rights of Way for foot traffic to access limited local facilities and has no plans to expand or improve them. The plan has no access to mainline Rail and relies completely on the existing compromised Shop and Leisure facilities from years of uncontrolled development. The proposal offers very limited employment opportunities and can only be seen as a dormitory location adding traffic to an already busy road network.

Four Marks South development seeks to provide a replacement Primary School for the existing Four Marks C.E which is located at the corner of Hawthorn Road and Kitwood Road. Whilst not centrally located, Hampshire County Council have recently committed development funds to expand the school to ensure that it meets the needs of the historically uncontrolled development. Relocation of the school may make sense at a transport level but is a gross waste of public funds as delivery of the proposed school is at the end of the scheme, clearly following completion of HCC current proposals scheduled for post Summer 2020. The proposed location of the new School will add considerable traffic to the North of Four Marks and making the A31 / Telegraph Lane junction unworkable. With no planned footpaths to avoid traffic congestion from the proposed development, the school will only generate additional car journeys.

The site is nothing more than an opportunist punt to build Houses without the detailed considerations other sites within this consultation have taken to mitigate the issues. This site should be considered wholly unsustainable and be dismissed immediately.

LAND SOUTH EAST of LIPHOOK - SUPPORT

The proposal offers a range of positive elements despite its adjacency to the South Downs National Park. It's adjacency to a mainline Rail service directly into London or Portsmouth ensures that Public Transport is integrated within the development. The station is within a 10-minute walk or 3-minute cycle ride from the proposed site, offering alternative methods of access to the network. A bus route through the site with minimal walking distances will link the development to the other areas in the Town including existing Shops and Leisure facilities. The A3 runs through Liphook and has the benefit of being able to quickly diffuse the additional traffic both North and South to other employment centres within Hampshire, although access from the site to the A3 needs more consideration as this level of development will add to congestion in the village.

The provision of a new Primary School on the site of the development will provide a number of school places that would be served directly by the development ensuring reduced reliance on traffic movements and increasing sustainability of the site. The size and nature of local Shops and Facilities will only be further enhanced by the locality of the development to the Town Centre, the mix of Shops ensuring the community will benefit from the additional housing and safeguarding and expanding on jobs.

Extensive land has been set aside for the development and improvement of alternative Green Spaces to the South of Liphook within the South Downs National Park should be considered beneficial to not only the new development but also to the wider Liphook area.

CHAWTON PARK – OBJECT

Chawton Park development can only be viewed as a Dormitory Development to Alton which promotes the coalescence of Alton and Chawton Village, its size and impact to the landscape around Alton and Chawton should be noted by Planners. The location of this development is totally disconnected to the rest of the village and relies entirely on the facilities that have been built and developed within Alton. The development shares no aligned vision to Chawton and seeks only to enable further development to the west of Alton.

The site does benefit from the relative adjacency to Alton mainline Station but is 2 miles distant and will require development of an improved public transport service to link to the Station. Access to Alton is sub-optimal, reliant upon access from Chawton Park Road that has no suitable footpath along its entire length. Access to the A31 is impractical, being limited by the single width, signal-controlled bridge under the Watercress Heritage Railway. It should be considered that this route also serves the sports/leisure centre and local health care facilities for a significant catchment area to the south-west of Alton. We do not find it believable that this size of development (1200 houses) together with the existing Chawton Park Road traffic can be accessed thus. Access from the site is also hampered by having a single road access to the whole site.

The adjacency to Alton Leisure Facilities and its existing shopping hub is a clear benefit, but the site counters that benefit with very limited development of Employment on site resulting in daily movement from the development being entirely inevitable.

A further significant concern is the loss of the valuable landscape which is a natural habitat to a diverse number of wild animals including deer that roam freely between Alton and Four Marks. The development pushes into the countryside and will undoubtedly impact that habitat, disturbing the balance of Local Nature Conservation Networks.

The location, size and impact on the Landscape & Nature Conservation Networks is inappropriate and unwarranted. It is unsustainable development and should be avoided.

LYMINGTON BOTTOM ROAD - OBJECT

The Location of this site is rural farmland behind existing development on Lymington Bottom Road and the Watercress Heritage Railway. There are planned to have three exits from the site directly onto Lymington Bottom Road and one onto Soldridge Road, both of which are Rural in nature and narrow. Access to the A31 is dependent upon a network of rural roads that are restricted in width by the Watercress line. The crossings at Grosvenor Road and Lymington Bottom Road are both lower than the railway line, passing under the bridge with a restricted width road. The crossing at Boyneswood Road is above the railway, the bridge width restricted. In summary, the site has poor connectivity to any transport networks and should be refused.

There are low Employment opportunities on the site, ensuring the dormitory nature of this development and ensuring traffic numbers will rise and add to the existing traffic from recent development along Lymington Bottom Road. Public Transport is limited to that running along the A31. Access from the development will be along Lymington Bottom Road which has no footpath until the pedestrian reaches the access road of Station Approach, this makes it an unacceptable location for the proposed number of houses. Rail links are available from Winchester and Alton, both are some distance from this development, 13.9 miles and 5.6 miles respectively. In summary, with no integrated transportation, the site relies totally on personal vehicles and should be seen as unsustainable development.

The development offers no additional Social facilities or additional Shops and Leisure Facilities. One positive point to note is the site providing a new Primary School to minimise the number of car journeys at peak hours.

EXTENSION to LAND EAST of HORNDEAN – SUPPORT

The proposal consists of land extending South from the existing development zone in Horndean and offers a number of positive points to support its consideration. The site builds upon the existing extension, east of the A3(M) which offers excellent transportation options: North towards Guildford, South to the Coast for Portsmouth, West to Southampton and East to Chichester and Brighton. This network of Highways, rather than smaller rural roads from other plans, ensures that Employment opportunities are good.

The adjacency to Waterlooville, Horndean and Portsmouth offers a wide range of Leisure and Social Facilities including retail opportunities. The development secures Employment in those areas and has the added benefit of providing local employment to those residents from the development area. The nearest Railway Station is Rowlands Castle, with a mainline route to London Waterloo and the South Coast. This location is highly integrated to local public transport making it a highly suitable location for development.

Response from Rowlands Castle PC to EHDC's Local Plan (Large Development Sites Consultation)

Rowlands Castle PC <clerk@rowlandscastlepc.org.uk>

Wed 09/10/2019 13:24

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: Johnson, Malcolm <Malcolm.Johnson@easthants.gov.uk>; Marge.Harvey@hants.gov.uk <Marge.Harvey@hants.gov.uk>; [REDACTED]

2 attachments (533 KB)

20191008 RCPC Covering Letter Response to EHDC Local Plan Large Sites Consultation.pdf; 20191008A - RCPC Questionnaire Response to EHDC Local Plan Large Development Sites Consultation.pdf;

Dear Sir/madam

Please find attached Rowlands Castle Parish Council's response to this Consultation, as agreed at the Council's Mtg on 7 October 2019.

Please note RCPC's response consists of 2 documents; a covering letter and an Annex with a detailed response to each of the 10 questions posed for the Consultation process.

If you have any queries, please do not hesitate to contact me. This response has today also been posted on RCPC's website.

Yours faithfully

[REDACTED]
Clerk to Rowlands Castle Parish Council
[REDACTED]*This email, and any files transmitted with it, are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify me immediately.***From:** EHDC - Local Plan [mailto:LocalPlan@easthants.gov.uk]**Sent:** 03 September 2019 11:32**To:** EHDC - Parish and Town Councils**Subject:** EHDC Local Plan (Large Development Sites Consultation)

Dear Town and Parish Councils

Notice of Consultation on the East Hampshire Local Plan (Large Development Sites Consultation)

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is consulting on the new Local Plan 2017-2036. The new Local Plan 2017-2036 provides a policy framework for planning and development for the areas of the district that lie outside of the South Downs National Park.

The Council invites you to make representations in regard of the scope, subject and contents of the Local Plan.

The consultation focusses on 10 strategic sites which could be allocated in the new Local Plan in line with its emerging spatial strategy. Comments are being sought on each of the sites to help inform decision about which sites to allocate within the Proposed Submission Local Plan (Regulation 19).

This Local Plan Large Development Sites is available for public consultation for a period of six weeks between 3 September 2019 and midnight 15 October 2019.

Consultation documents and comment forms can be found and completed online via the Council's consultation page at <http://www.easthants.gov.uk/draft-local-plan>.Where possible, comments should be submitted electronically via our online portal: <https://easthants.oc2.uk/>. Where this is not possible comments can also be emailed to localplan@easthants.gov.uk or posted to Planning Policy East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EXIf you have any enquiries regarding the Regulation 18 Local Plan Large Development Sites consultation, please email localplan@easthants.gov.uk or call 01730 234102 and a member of the Planning Policy Team will be able to assist.

Kind regards

The Planning Policy Team

FIND OUT MORE AT
WWW.EASTHANTS.GOV.UK/LOCALPLAN
**East
Hampshire**
DISTRICT COUNCIL

Planning Policy Department
East Hampshire District Council
By Email: localplan@easthants.gov.uk

8 October 2019

Dear Sir/Madam

East Hampshire District Council (EHDC) Local Plan: Large Development Sites Consultation

Rowlands Castle Parish Council (RCPC) has considered which two of the 10 Large Sites identified appear most suitable to include in EHDC's Local Plan. In the attached Annex A, using the questions asked in the Consultation, RCPC offers both the reasons why this is so and gives more detailed comments as to why the Extension of the Land East of Horndean (Hazelton Farm) is not suitable for further consideration.

Overall Assessment

The 2 sites that originally featured in the draft Local Plan, namely Whitehill & Bordon (WB) and Northbrook Park (NBP), stand out as the most suitable to be taken forward. In particular, they have considered the provision of good infrastructure that is the key to delivering success in providing new homes, places of employment, entertainment and leisure facilities.

- WB builds on the current excellent redevelopment of the former garrison town using a majority of brownfield sites and with the potential to really draw in retail and other amenity providers because of the large size of the overall project and increased footfall. It is fairly close to main trunk routes north and south, together with the stations at Bentley and at Farnham.
- NBP is very well situated to take advantage of the A31 trunk route and the relative proximity of Farnham Station, together with the various amenities of that town, whilst at the same time being an excellent example of how we should build new communities that are attractive to live in and can form a real community, not just a dormitory area that lacks focus.
- The location of these 2 sites also enables residents to access London, Guildford and other local large centres for work or entertainment relatively easily using public transport and main roads.
- These 2 sites contrast strongly with the poor proposal that forms the Extension of the Land East of Horndean (Hazelton Farm) (HD). Here, the developer's first premise is that the adjacent Land East of Horndean (LEoH) development will progress quite quickly (though this is definitely proving not to be the case to date) and where the infrastructure in general is not up to supporting such a large further increase in the local population over and above that proposed for LEOH. Many of the residents will need to seek work at a distance in Havant, Portsmouth, eastwards to Chichester and beyond and northwards to Petersfield and beyond eg Guildford and London. There are no convenient rail links and no substantial bus services, thus there would be a very considerable increase in car commuting along a now inadequate local road system (apart from the already crowded A3(M)). It will represent a population overload to the area when all the local developments proposed over the next 10-20 years are taken into consideration. The building of what will effectively be a large 'dormitory' development with no real focus is not what modern planning should be about.

Annex A attached provides the detail of RCPC's response.

Yours faithfully

██████████
██████████

Cllr Chris Stanley
Chairman of Rowlands Castle Parish Council

EHDC Local Plan – Large Development Sites Consultation

Q1: Do you have any comments on the proposed uses?

Whitehill & Bordon (WB)

The site offers an excellent balance of additional homes (plus some sites for the travelling community), employment and SANGS that will make the area attractive to live, work and take recreation within. The increased population will draw in more retail opportunities, encouraged by the potential large local footfall and thus many people should not need to drive out of the area in order to find work, important as we try to address climate change by minimising car use.

Northbrook Park (NBP) near Bentley

This site offers to establish a real new community with unifying assets at its heart while also providing employment opportunities close by but just separated enough from the housing not to impose upon the nature of a village community. Again the balance of housing, employment and leisure facilities seems sound.

Land East of Horndean Extension (Hazleton Farm) (HD)

- a. This is a large area of mostly housing to be tacked onto a proposed development (LEOH) that is still beset with planning issues and yet to be approved, with a few more shops and services but with no obvious heart and with a great reliance on facilities elsewhere outside the development to support the very considerable increase in population. It is in effect much more of a dormitory area without any real opportunities within it to be employed, so that most of the residents will need to leave the area to seek work elsewhere.
- b. The Information Pack for this site states that the Southern parishes must make a significant contribution towards housing (and employment) provision, especially in the context of the Partnership for South Hampshire (PfSH) strategy for growth (see note HD1.1). The PfSH Position Statement (June 2016) (see note HD1.2) does identify a shortfall in housing provision in this area but the Sustainability Appraisal of the emerging EHDC Local Plan (interim) dated December 2018 (see note HD 1.3) acknowledges that the current Local Plan is aiming to identify supply over-and-above that in the PfSH Position Statement and that there could be further opportunities to release public sector land, such as Ministry of Defence sites that lie within the PfSH area but outside of East Hampshire. This demonstrates that there is no evidence from PfSH of the need to provide 1,000 more dwellings within its Southern Parishes sub-region.
- c. The new homes on this site would be more likely than other sites being considered to support commuting to jobs and training opportunities elsewhere (in Havant, Portsmouth and the wider Solent area) rather than providing substantial opportunities to address job/training needs internally within East Hampshire, and so it would have less economic and employment-related benefits for the local area.
- d. The plan in the Information Pack proposes that the gypsy and traveller pitches and travelling showpeople plots would be within about 250m of the Solent Special Protection Area 5.6km buffer zone, so compliance with paragraph S22.1 in Policy S22: 'Solent special protection areas' in the emerging Local Plan would have to be considered. The 'EHDC Meeting the Accommodation Needs of Gypsies, Travellers and Travelling Showpeople Background Paper' (2018) acknowledges that proximity to a Special Protection Area is a constraint (see Note HD1.4). The pitches and plots would be immediately adjacent to the Havant Thicket SINC and the access road to the proposed Havant Thicket reservoir

- e. Is there really the need for such extensive housing plans in the PUSH / Southern Parishes area? Housing demand is suppressed at present as evidenced by the slowing of the Montague Green build in Rowlands Castle and houses for sale there and in the village remain so for extensive periods. The real need is for first time housing / retirement housing so any planning on this scale should emphasise this element of the market. Whilst EHDC aspire to 40% affordable housing, the execution of this policy appears patchy and ill defined.
- f. Land allocated for community use – what evidence is there of real demand for another centre for local use? Rowlands Castle – just under two miles – away has ample under-utilised community facilities. Whilst these are a car ride away, there is a risk of oversupply and underuse subsequently.
- g. Travellers’ pitches. What evidence is there of demand for these in this location? Are these the result of consultation with the travelling community – or a random but uniform requirement of all the large settlement plans?

Notes:

HD1.1

The Information Pack for this site states:

‘The site falls within the Southern Parishes and within the South Hampshire sub-region. This is important as the Southern Parishes are required to make a significant contribution towards housing (and employment) provision, especially in the context of the Partnership for South Hampshire (PfSH) strategy for growth’.

HD1.2

The PUSH (now PfSH) Position Statement (June 2016) records in paragraph 3.6 Table 1 that the objectively assessed housing need (2011 to 2036) in the part of EHDC which is within PUSH is 1,750.

HD1.3

The Sustainability Appraisal of the emerging EHDC Local Plan (interim) dated December 2018 states in paragraph 5.16:

The PUSH Position Statement (2016) identified a shortfall of supply, against housing needs as understood at that time; however, since 2016 work has been ongoing to identify additional capacity, and indeed this current Local Plan is aiming to identify supply over-and-above that taken into account by the PUSH Position Statement (2016). The PUSH authorities, including East Hampshire, recognise a need to continue investigating all opportunities in order to avoid a shortfall; for example, there could be further opportunities to release public sector land, such as Ministry of Defence sites that lie within the PUSH area but outside of East Hampshire.

HD1.4

The EHDC Meeting the Accommodation Needs of Gypsies, Travellers and Travelling Showpeople Background Paper (2018) states in paragraph 6.3:

The LAA concludes that at present, there is insufficient developable land to meet the need for Traveller accommodation in the area. There is one particular constraint to development that is a significant contributing factor to this outcome. That is the proximity of available land to the Wealden Heaths Phase II Special Protection Area (SPA).

Q2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

- a. **General comment.** Large developments of new homes need considerable local employment opportunities together with sufficient retail, leisure and entertainment provision that residents

do not have to travel elsewhere too often. In addition the provision of public transport, both bus and rail, is important so that residents can travel out of the district if work or leisure interests require it. Both for WB and NBP there is sufficient infrastructure proposed and available already to support the developments. By contrast HD needs work done to improve the local B road and connections to it, additional bus services and sustainable southbound as well as northbound, together with sustainable on-site retail opportunities that will, however, be challenged by the proximity of existing retail in the local area that is not necessarily convenient and will require increased car usage to access

HD specific comments follow:

- b. New vehicular access via the B2149. The Information Pack states on page 8 that the site has an opportunity to create a new vehicular access via the B2149, and the plan on page 6 shows only one access, but this would be inadequate for a site with 1,000 dwellings. It would also have to provide access to the employment park. The road layout proposed in the outstanding outline planning application 55562/005 for the current LEOH site includes an access road to its employment area which is separate from roads accessing the residential areas, which is to the benefit of the residents. This new access would have to be used to travel to and from the 6 gypsy and traveler pitches and the 12 travelling showpeople plots.
- c. Minimal upgrade to road infrastructure is a well documented but key concern. The scale of traffic using Rowlands Castle Road and Havant Road appears grossly underestimated & these proposals will lead to a significant increase in car journeys both to Rowlands Castle (whether for shops, doctors' surgery or station) and through Rowlands Castle to Chichester (Woodberry Lane) or Havant Road to Whichers Gate Road / Durrants Road and then south to Havant or Emsworth linking with the A27. The local road infrastructure must be fit for purpose and will require proper review and money spent to ensure they can cope with the increased traffic.
- d. The pack also states only that there is an opportunity to create vehicular and pedestrian connections to the allocated development site to the north. There would be very few, if any, areas through which such connections (especially for vehicles) could be created. Along the southernmost boundary of the 'site to the north', there is a row of 8 oak trees subject to TPO (EH963) (dated 23/07/2015) and the root protection zones around those trees would have to be avoided. At the south-west corner of the 'site to the north', there is a large wooded area which it is planned to retain.
- e. If it were possible to locate a position where such connections could be made, this would require significant changes to the layout proposed in the planning application 55562/005, perhaps resulting in a reduced number of dwellings, and there is no indication that the applicant has made a commitment to consider such changes.
- f. In proposing any new access or accesses to the B2149, it must be recognized that planning application 55562/005 proposes three additional roads (including a new roundabout) connecting with the B2149, and a new road connecting with the existing Dell Piece East roundabout. These are in addition to the Pyle Lane Junction. Havant Thicket Reservoir will provide another new access onto the B2149 to the south of the HD site. It must be ascertained if it is viable and safe to provide so many accesses along 0.7 miles of the heavily used B2149. Also it must be recognized that turning right out of the development to travel south along the B2149 would be greatly aided by providing mini-roundabouts at exit points. The considerable increase in traffic on the road from developments to the south will make it very hard to turn out across a stream of traffic in peak hours particularly but not exclusively. An integrated design of all proposed access road junctions with the B2149 would be required.
- g. Additional primary school places must be provided. The proposal for the LEOH site includes a primary school to meet the needs of that site and already identified needs elsewhere. 1,000 extra dwellings could require 300 additional primary school places. The site is within the

catchment area of Rowlands Castle St. John's CEC Primary School which is already full, and eventually it will be able to accommodate only children from the existing houses and those already under construction within the Parish. The site is about 2 km from this school, and no footpath is proposed along Havant Road.

- h. GP surgery facilities must be provided. The site is within the catchment area of the Rowlands Castle Surgery, but it is at about 2.3 km travelling distance, and has very limited car parking provision. The Surgery already covers a large population, many of whom are elderly and thus needing more medical care than a more age-balanced population.
- i. To encourage the use of sustainable methods of travel, improved access to and parking at the nearest railway station, which is in Rowlands Castle, must be provided. The station at Rowlands Castle has very limited parking facilities which are fully utilised on most weekdays by 7am. This will lead to additional parking in the village – or more likely additional car journeys to Havant or Petersfield for onward travel. With new development on this scale, input should be sought from South Western Railway on the scope for increasing the frequency of stopping services both to London and to Portsmouth.
- j. Bus travel – no detail is provided as to frequency / destinations served. The key will be to establish from the outset a routine of bus usage to Rowlands Castle & Havant, also to Horndean & Petersfield etc. If the bus links aren't available from the start then driving patterns will be established immediately by new residents. More detail is required urgently on this front.
- k. Policy S2 'Managing land release via phasing' in the emerging Local Plan must be observed when considering the allocation of this site. As stated in this policy, allowing the release now of all additional sites allocated within this Plan could undermine delivery if it were to result in the rate of new development outstripping an area's ability to provide new infrastructure. This is allowed for in the following policies relating to Rowlands Castle:
 - Site SA39 - Land at Oaklands House (50 dwellings) – 2033/34
 - Site SA40 - Land North of Bartons Road – (50-60 dwellings) - between 2034/35 and 2035/36
 - Site SA41 - Land South of Little Leigh Farm (110-115 dwellings) – between 2033/34 and 2035/36.

The table below demonstrates the very significant actual and forecast rate of new development in Rowlands Castle parish which must be supported by new infrastructure.

	Housing stock	Reason for increase	Increase from 2011
2011 (Census data)	1,255		
2015	1,297	Completion of 'Land at Oaklands House' planning application 30016/014	3%
2019	1,497	Completion of houses allocated in current Local Plan and Large Urban Potential site (Keyline)	19%
2030	1,697	Completion of houses in area of LEOH in RC Parish	35%
2033-2036	1,922	Completion of houses on 3 sites allocated in emerging Local Plan	53%
2036	2,922	Large site extension of LEOH	133%

There would be a corresponding increase in the population of the Rowlands Castle Parish, which would require infrastructure such as GP surgery, schools etc.

Q3: Do you know of any other constraints to developing the site? Please provide detail and evidence.

- a. For WB and NBP there are no known or obvious constraints to developing those sites.

HD specific comments follow:

b. Highways impacts

- 1) The impact of the additional traffic arising from this proposed extension and the other site allocations and committed developments both in EHDC and Havant Borough Council adopted and emerging Local Plans, on the B2148, B2149 and adjoining roads in Rowlands Castle, must be assessed for viability and mitigation measures should be implemented.
- 2) As noted in RCPC's response on 6th September 2019 to the EHDC Pre-decision Amendment to planning application 55562/005 for 800 dwellings etc. on Land East of Horndean (Policy HN1 in adopted Local Plan), there would be an increase in traffic of at least 13% along Havant Road south of the southernmost access to the site. It could be assumed, that pro-rata, the extension site would give rise to a further 16%, resulting in a cumulative increase of at least 29%.
- 3) The East Hampshire Local Plan Interim Transport Assessment (TA) – February 2019, considers only the sites allocated in the adopted Local Plan Allocations (April 2016) and not the allocated development sites in the emerging local plan. Therefore, it does not consider the proposed increase on the LEOH site from 700 (Policy HN1) to 850 dwellings (Site SA33). The impact of a further 1,000 dwellings at Halzeton Farm must also be considered.
- 4) This TA acknowledges two 'hot spots' at the mini-roundabouts on the B2149 (see note HD3.1 below); the capacity of those roundabouts would be further exceeded by the addition of 150 dwellings to the LEOH site and 1,000 dwellings on the extension site:
- 5) The EHDC Local Plan Interim TA considers only sites allocated in the adopted Havant Borough Council (HBC) Allocation Plan (April 2014). Therefore, it does not consider the impact of traffic on the B2148 and B2149 in Rowlands Castle arising from sites allocated for 2,400 dwellings up to 2036 and a further 1,000 thereafter, in the emerging HBC Local Plan. Traffic from these sites will use these roads when travelling to and from destinations (including the A3(M) Junction 2) to the north of Rowlands Castle.
- 6) The impact of increased traffic from the extension site and the LEOH Site (SA33) on the junction of Manor Lodge Road (a continuation of Havant Road) and Mallard Road must be assessed. The EHDC Interim TA acknowledges this is a 'hotspot' even without considering the additional 150 dwellings on the LEOH site (see note HD3.2).
- 7) The impact of increased traffic from the extension site and the LEOH Site (SA33) on the junction of Castle Road and Havant Road must be assessed. Some traffic from both of these sites would be very likely to use Castle Road to access the Rowlands Castle railway station, the Rowlands Castle GP surgery, and places such as Chichester which are further to the east. Vehicles are parked along most of the length of this road, making it very difficult for other vehicles to pass along it. Any increase would exacerbate this problem. The exit from Castle Road at its junction with Havant Road (B2149) already presents safety issues.

An alternative route into Rowlands Castle using Rowlands Castle Road, Treadwheel Road, Woodhouse Lane and Bowes Hill is similarly unsuitable for a significant growth in traffic and requires a right turn at a dangerous junction by the railway bridge in the centre of the village for the shops and Surgery and a sharp, unsighted left hand turn for the railway station.

c. Landscape setting and capacity

The following assessment of the constraints on this site in the EHDC Landscape Capacity Study (Part 2) must be considered:

- Visual Sensitivity: Medium
- Wider Landscape Sensitivity: Medium/High
- Landscape Sensitivity - High
- Overall Landscape Sensitivity: Medium/High
- Landscape Value: Medium
- Landscape Capacity: Medium/Low

The combined Horndean development will completely change the rural nature of the Horndean / Blendworth community and encourage a move towards the eventual linking of Havant / Rowlands Castle / Horndean as a suburban housing site but without a true core.

d. Water quality impact

This site occupies Blendworth Common and the Rowlands Castle Landscape Character Assessment (2012) (see Note HD3.3) shows that it lies within a Groundwater Source Protection Zone 1. It further states that Blendworth Common has features including swallow holes which provide direct access of surface water to a major groundwater aquifer providing drinking water via the Havant and Bedhampton Springs. The site is also in close proximity to the proposed Havant Thicket reservoir. Therefore, any development would have the potential for causing significant adverse effects on water quality. Drainage would need to be very carefully assessed given the need for ongoing management of the systems – particularly if the choice was to use SUDS which may well not be adopted by Southern Water. This would be too big a scheme to leave in the hands of a private management company not subject to sufficient public scrutiny.

e. Environmental impact

The environmental impact of the large increase in traffic on the B2149 referred to above, must be evaluated and mitigated if possible. Blendworth Common on which the HD site will be built provides an excellent environment for plants, animals and birds that need a poor quality landscape to live in, undisturbed by humans. The open ground balances the woodland area of Havant Thicket to the south. With the loss of open space to the south of the Thicket for the new reservoir the wildlife will need the quiet, human-free, open space of Blendworth Common as the only useful open space for a considerable distance. Any proposed wildlife corridors within the new development would be a very poor substitute for the existing rough and wild area of the Common.

Notes:

HD3.1

The East Hampshire Local Plan Interim Transport Assessment (TA) – February 2019 states on page 31:

- Junction 42 - Durrants dual mini roundabouts [SOUTH]: on the Manor Lodge Road [NW] approach arm, this junction is forecast high delays of 126s in the PM period, as well as a high Volume/Capacity (V/C) of 101% in the AM and IP (inter-peak) periods and 106% in the PM period.
- Junction 43 - Durrants dual mini roundabouts [NORTH]: on the Manor Lodge Road [NW] approach arm, this junction is forecast a moderately high 86% V/C in the IP period. On the Manor Lodge Road [SE] approach arm, this junction is forecast high delays of 88s with 104% V/C in the AM period, and high V/C ratios of 100% and 102% in the IP and PM periods, respectively

HD3.2

The East Hampshire Local Plan Interim Transport Assessment (TA) – February 2019 states on page 31:

Junction 44 - Manor Lodge Rd / Mallard Rd: on the Manor Lodge Road [NW] approach arm, this junction is forecast high delays of 83s with a 91% V/C in the AM period, and of 94s with 93% V/C in the PM period

HD3.3

The Rowlands Castle Local Landscape Character Assessment (2012) page 20, 'Area 10a ii Sink Hole Belt – Manor Lodge Road and Blendworth Common' states:

1. A NW to SE trending band of land, between 0.4 and 1.2km wide, characterised by an unusually high density of circular surface depressions (20-50 per sq. km) of up to 30m in diameter and 10m in depth, formed by erosion and dissolution of the underlying chalk, and sinking of the overlying clays and sands. The belt extends well to the west and south of Manor Lodge Road.

2. Many of the depressions act as swallow holes and provide direct access of surface water to a major groundwater aquifer providing drinking water via the Havant and Bedhampton Springs. Most of this belt is considered a high groundwater pollution risk zone and is classified by the Environment Agency as Source Protection Zone 1 – the highest level of risk (see note below).

Note: The 10a ii area is characterised by a high density of shallow circular depressions variously called dolines, sink holes or swallow holes. By way of clarification, 'dolines' are natural cone or bowl shaped closed hollows of small dimensions occurring in chalk areas. When located on a soil outcrop above the chalk, away from the edge of the chalk itself, they are called 'sink holes'. A 'swallow hole' is a potentially more active feature in chalk areas as there can be direct flow of surface water into the chalk. A detailed discussion of the nature, location and environmental significance of these features is provided in the paper by McDowell et al (2008).

Q4: What opportunities and/or benefits do you think the proposal could bring? Please explain how.

For both WB and NBP these are obvious, major new employment opportunities, a range of leisure and retail facilities appropriate to the site size and the development of housing in areas where the residents can, if they wish or need to, access London and more local towns easily for work or other requirements. In WB's case the benefits include the re-use of former MoD land than is being developed in a sympathetic way rather than being left idle and for NBP the creation of the village trust and the whole concept around the development will give a sense of well-being and a sense of belonging; this can also be applied to WB of course on a larger scale. For HD there are no obvious benefits other than just more housing.

Q5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

HD specific comments follow.

- a. Assessment is required of the impact on the Havant road network of the additional traffic from this proposed site. The responses to Q3 show the large increase in traffic which would use the B2149 south of the proposed site. The large part of this traffic would be travelling to and from the direction of Havant Borough using the B2148 or B2149.

- b. The Havant Borough Council Local Plan Final Transport Assessment (February 2019), which is evidence for the emerging Havant Local Plan, does not consider sites proposed for allocation in the emerging EHDC Local Plan. It considers only the sites in the EHDC Allocations Plan (2016) which includes policy HN1 for 700 dwellings, and does not consider Site SA33 which is for about 850 dwellings, and, of course this extension site if it were to be allocated'
- c. With regard to PfSH, see comments on Q1.
- d. Secondary education – are there sufficient facilities for a population increase on this scale. The nearest secondary schools with spaces may be in Havant.
- e. The very large increase in residents in the area will require additional infrastructure improvements across the board from transport to schools, retail and medical support. This will require a proper coordinated approach from councils at different levels to overcome the pressures resulting from residential expansion. This pressure can only be overcome by a top-down approach and willingness across public organisations to work together on these issues.

Q6: Is there any reason that this is not achievable?

- a. For both WB and NBP these sites should be easily achievable, there is no obvious reason why not.
- b. The following comments indicate why, for the HD site, this proposal would not be deliverable by 2036:

1) The Information Pack for this site states:

'It is recognised that if development is approved it is likely to follow after development of the LEOH site to the north. In this context, development of the site can readily accommodate housing (and employment) requirements during the period of the emerging Local Plan, i.e. up to the year 2036.'

Unlike Information Packs for other large sites, this one does not provide a phased delivery schedule which would indicate the number of dwellings that could be provided by specific dates. Therefore, there is no firm indication of how many dwellings would be constructed during the plan period.

2) The EHDC Land Availability Assessment (LAA) (December 2018) gives the indicative phasing of this proposed extension to the current LEOH site as 400-500 dwellings within 6-10 years, and 400-500 within 11-15 years. This implies that development would have to start in 2021 if the whole proposal were to be delivered by 2036. This would require that, contrary to the Information Pack, the development of the extension would not follow the development of the LEOH site which will not be complete by 2021.

3) There are four very differing forecasts of when the development of the current LEOH site would be completed (see note HD6.1). The dates range over 8 years from 2028 to 2036. These forecasts would require permission for the current LEOH outstanding Outline Planning Application 55562/005, and any subsequent Reserved Matters application to be granted by, say, end of 2020. Before any development could start on the extension site it would have to be included in the Local Plan (planned for adoption in Q1 2021) and have been granted planning permission (e.g. outline and reserved matters). In considering these factors, and the indicative phasing (up to 15 years) of this extension site, it would not be possible for this site to be completely delivered by 2036.

4) It is essential that, as stated in the Sustainability Appraisal of the emerging EHDC Local Plan (interim) dated December 2018 (see note HD 6.2), if this site were to be allocated, it and the already allocated site would be a coherently planned eastward extension to

Horndean and that it would not be a large-scale development that is unsustainable in landscape/townscape terms. In other words the 2 developments must become a sprawling development that lacks a defined centre and therefore a sense of place. However, the Sustainability Appraisal acknowledges that because the two sites are at very different stages in the planning process and there is no firm commitment on the part of the development interests to reconsider the area as a whole, there is a high risk that such a coherent plan would not be achieved.

5) If a coherent and integrated design of the two sites was to be agreed, this would delay the start of the current LEOH development that, in turn, would delay the start of this proposed extension, thereby making it even less likely than referred to above, that this extension site would be delivered by 2036. Delaying the start of the current LEOH development would have an adverse impact on the EHDC Five-year housing supply forecasts.

6) The long planning history (first application submitted in October 2014) and current status of planning applications for the current LEOH site, and its six owners (of whom the owner of the proposed LEOH extension is only one), change of developers, and now two developers, must be considered. There are three planning applications outstanding for the current LEOH site (Policy HN1), and they do not yet provide a consistent and coherent design.

7) Allowance must also be made for the length of time of the planning procedure that would have to be followed to ensure that the outstanding application 55562/005 which is in accordance with policy HN1 in the current Local Plan, would be amended and a revised application covering the original and extended site in accordance with the new Local Plan (planned for adoption in Q1 2021) could be submitted.

Notes:

HD6.1

- The Design and Access Statement (December 2018) submitted by Bloor Homes for outline planning application 55562/005 for 800 dwellings etc on the Land East of Horndean site, on page 45 describes 'Phasing and Delivery' of the proposed development. This indicates that Phase 3 (the final phase) during years 7 and 10 of the development, the homes in the southwest area (adjacent to this proposed site) would be constructed.
- The emerging Local Plan states for Site SA33 (Land East of Horndean) that, based on current evidence, it is anticipated that housing completions will begin in 2020/21 and finish in 2027/28.
- EHDC Land Availability Assessment (LAA) (December 2018) gives the indicative phasing of the current LEOH site as 100 dwellings within 6-10 years, and 50 within 11-15 years.
- The East Hampshire Five Year Housing Land Supply Position Statement (for the period 2019/20 to 2023/24) (dated July 2019) projects that (only) 150 of the proposed 800 dwellings on the Land East of Horndean site will be completed by 2024. This indicates that even without amending the currently proposed design to integrate it with the proposed extension, EHDC is expecting the housing to be delivered at a slow pace, and that not much of this housing on this site to be delivered in the near future. This also indicates that if this new proposed development would not start until the current proposed LEOH development is complete, it would be very unlikely that this site would be (fully) delivered by 2036, given the indicative phasing described in the EHDC LAA.

HD6.2

The Sustainability Appraisal of the emerging Local EHDC Local Plan (interim) dated December 2018 states:

- Paragraph 5.52
Another consideration is the possibility planning for a comprehensive 'East of Horndean' scheme including the current Local Plan Part 2 allocation (i.e. joint planning for the two adjacent sites). This could achieve a more coherently planned and designed extension to Horndean.
- Paragraph 7.10
The allocated site and the newly promoted extension might not be developed to provide a coherently planned eastward extension to Horndean, because these sites are at very different stages in the planning process and there is no firm commitment on the part of the development interests to reconsider the area as a whole, to achieve the most sustainable new settlement option. Unless and until this context for development changes (e.g. through consultation responses to the draft local plan), the Council considers that the risk of a large-scale development that is unsustainable in landscape/townscape terms – i.e. a sprawling development that lacks a defined centre and therefore a sense of place – is prohibitive for advancing with this Option.

Q7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?

Not considered as the PC has no feel for any other potential Large Development Sites

Q8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper?

No comments

Q9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?

No comments

Q10: Is there any feedback you would like to give us about this consultation?

It was important to undertake the consultation if there was a feeling that more information needed to be gathered but it was not clear to members of the public that the public events would just be facilitated by EHDC with all the speaking done by the developers.

Rowledge Residents Association comments to Local Plan Consultation, Large Development Sites

[Redacted]

Tue 15/10/2019 11:16

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (208 KB)

Rowledge Residents Association Response EHDC Local Plan Questionnaire large development sites for web.docx;

Please find our objection response as attached.

[Redacted]

Rowledge Residents Association

Large Development Sites

(REGULATION 18)

CONSULTATION QUESTIONNAIRE

3 September – 15 October 2019



East Hampshire Local Plan Large Development Sites

This questionnaire has been prepared to assist you in responding to the consultation and should be used alongside the Large Development Sites consultation document and the Why, when and how to get involved guide.

Please note that the Council is unable to accept anonymous comments and for a comment to be formally accepted, a name and contact address (preferably e-mail) must be provided. Comments to this consultation are part of the evidence base which supports the emerging Local Plan. As such, all comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website. Your comments will be made publicly viewable at the appropriate time.

If you wish to be kept updated about this consultation and other Local Plan matters, please register for email alerts via our website.

Name

Organisation (if applicable)

Email (preferred method of contact)

Address Line 1

Post Town

Post Code



To be completed by agents acting on behalf of a client

Client Name

Client Organisation

Client Email

Client Address Line 1

Client Post Town

Client Post Code



How to respond using this form

Please refer to the ***Why, when and how to get involved*** guide available on our [website](#).

When responding, please include the name of the site your comments refer to. If commenting on more than one site, please make it clear which comment relates to which site.

There are a series of consultation questions. These are:

- 1: Do you have any comments on the proposed uses?
- 2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.
- 3: Do you know of any other constraints to developing the site? Please provide detail and evidence.
- 4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.
- 5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036.

- 6: Is there any reason that this is not achievable?
- 7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?
- 8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper? <link>
- 9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?
- 10: Is there any feedback you would like to give us about this consultation?



Large Development Sites

When responding to a consultation question please quote the question number from the list provided and where applicable, the site name.



Please provide your comments in the box below. Use additional sheets as required.

Click here to enter text electronically

Rowledge Residents Association (RRA) Response to Consultation – Northbrook Park

The RRA objects to the allocation of land at Northbrook Park as proposed in the draft Local Plan.

Our previous objection raised on 18th March 2019 stands, which I repeat as follows:

Representation ID: 24303, Document: Draft Local Plan 2017-2036, Section: Site SA21 - Land at Northbrook Park.

We object to the proposed development for the following reasons:

- located in an area of open countryside, contrary to S17.3 and DM24.*
- will lead to ribbon development along the A325 corridor and loss of rural amenity, contrary to DM5*
- impact on setting of South Downs National Park, contrary to S18.1*
- impact on Wey floodplain and biodiversity, contrary to S19.1*
- impact on local and strategic road networks, contrary to S30.2*
- inconsistent with neighbouring Waverley Local Plan*

We believe the proposed location is not sustainable and the adverse impacts of the development demonstrably outweigh the benefits.

In addition, further to our visit to your consultation event in Bordon on 28th September, we have further concerns as follows:

- It is clear that this proposed development will have significant, unacceptable negative impact up on traffic volume and flow along the A31 Farnham bypass which will in turn lead to additional volume and issues on the A325, via Wrecclesham and Holt Pound, and through Farnham town centre itself. The representatives at the Bordon event alluded to mitigating measures being considered for the roundabouts at Coxbridge and Shepherd & Flock but offered no detail.*
- The proposal's attempts to demonstrate sustainability include references to a school, shops, a pub, community centre, a cycle route and new bus service to Farnham and the station. Yet there is no evidence of what measures will be in place to ensure they will be made mandatory from the very first phase of the development. Furthermore, there is no detail as to how these services would be subsidised, and by whom, during the many years of the development's duration - it is inconceivable that they could be self-sustaining long before the full compliment of 800 homes are built and occupied.*
- Despite attempts at the separation of the proposed main residential area from the National Park, the development will still have a significant negative visual impact on the Park at its northern boundary in an area that is currently almost unspoiled. Furthermore, the design chooses to buffer the park from the residential development with a significant commercial development, which could not be less appropriate.*



Click here to enter text electronically

SUBMISSION

Please submit your comments to reach us by midnight on 15 October 2019 either by:

- E-mail to localplan@easthants.gov.uk
- By post to Planning Policy, East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

Thank you for taking the time to have your say.



EHDC Local Plan - Large Development Sites consultation response from the RSPB

[REDACTED]
Tue 15/10/2019 13:32

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (198 KB)

RSPB response to EHDC Local Plan - Large Development Sites.pdf;

Dear Sir/Madam,

Please see attached the RSPB's response to East Hampshire District Council's Local Plan – Large Development Sites consultation. We would be very grateful to obtain confirmation of our response being received. I hope you find our comments useful, and if there is anything you need to discuss please do not hesitate to contact me using the below contact details.

Kind Regards,

[REDACTED]
Conservation Officer

RSPB England - Brighton Office 1st Floor Pavilion View, 19 New Road, Brighton, BN1 1UF
Tel 01273 775333

rspb.org.uk

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Planning Policy
East Hampshire District Council
Penns Place
Petersfield
Hampshire GU13 4EX

By email only: localplan@easthants.gov.uk

15th October 2019

Dear Sir/Madam

Re: East Hampshire District Council Local Plan Large Development Sites Consultation

Thank you for consulting the RSPB on the above document. We have reviewed the Large Development Sites Consultation document and the relevant additional information packs and would like to make the following comments.

We have focused our response on the potential impacts from these proposals on the Thames Basin and Wealden Heaths (Phase 1 and 2) Special Protection Areas (SPAs), particularly impacts on the integrity of these internationally designated sites as a result of increased recreational disturbance. Priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures (locating development away from the SPAs). We are particularly concerned with the adequacy of the proposed mitigation, Suitable Alternative Natural Greenspace (SANG) and lack of Strategic Access Management and Monitoring (SAMM). We provide detailed comments below with reference to the relevant questions detailed within the consultation document.

Land South East of Liphook

LP2

The proposed site 'Land South East of Liphook' lies 1.1km from Bramshott and Ludshott Commons, a component part of the Wealden Heaths Phase 2 SPA. A bespoke SANG of approximately 15.4ha in size has been identified. The RSPB has serious concerns regarding the quality of the proposed SANG and the likely effectiveness of this greenspace to function as a desirable alternative to the SPA.

A key feature for a SANG is the provision of attractive circular routes of around 2.5km in length. A circular route through the proposed SANG would not be possible without requiring the use of urban areas outside

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The RSPB is part of BirdLife International,
a partnership of conservation organisations
working to give nature a home around the world.

of the SANG boundaries, of which we do not consider appropriate. As a result of the intrusion of these urban areas we do not consider that this will create the type of attractive greenspace that would function as an effective alternative to the SPA. In addition, there is existing recreational use of the proposed SANG indicated by the Public Rights of Way (PRoW); to the western entrance of the proposed SANG via the railway underpass and on the eastern side via Highfield Lane. We would question whether there is sufficient capacity to absorb the anticipated recreational use from the proposed housing. Evidence is required of the current use of the site to determine capacity. Furthermore, the proposed SANG would appear to be composed entirely of dense woodland routes which not only fails to provide the open and varied habitat that generally appeals to recreational users, but also may present safety concerns for visitors.

The RSPB considers that the proposed SANG for Land South East of Liphook fails to provide appropriate mitigation for recreational disturbance impacts on the Wealden Heaths Phase 2 SPA. Therefore, alternative mitigation proposals are required if this housing proposal is to be considered further to ensure that the SPA is not adversely affected.

Northbrook Park

NBP2

The proposed site 'Northbrook Park' lies 4.2km from Bourley and Long Valley, a component part of the Thames Basin Heaths SPA. Northbrook Park has provided information for the provision of 15.4ha of bespoke SANG. The RSPB acknowledges the adequate size and location of the proposed SANG in relation to the development, with the proviso that safe routes are available for residents to walk to the SANG from the development. This is most notable in the eastern section of the development, where pedestrian access is not clear. However, we remain concerned about the quality of SANG.

The RSPB has serious concerns regarding the potential for the SANG to flood given that the SANG is almost entirely located within the flood zone. An area at risk of frequent flooding with waterlogged routes would be undesirable to visitors. In addition, a key feature of a SANG is the provision of an attractive circular walk of around 2.5km in length. The proposed route is contrived, most notably in a section containing a pinch point (where the route is only 20m apart), requiring visitors to effectively 'double-back' on themselves. We do not consider that this creates the type of attractive route that will act as an effective alternative to the Thames Basin Heaths SPA.

Considering our above concerns, the RSPB believe that the proposed SANG will fail to provide appropriate mitigation for recreational disturbance impacts on the Thames Basin Heaths in its current form. Therefore, amended mitigation proposals are required if Northbrook Park is to be considered further to ensure that the Thames Basin Heaths are not adversely affected. Furthermore, in relation to the RSPB's comments on the East Hampshire District Council Draft Local Plan (Regs 18), the proposed development on Land at Northbrook Park should confirm that there is sufficient capacity in the Thames Basin Heaths (TBH) SAMM Project, and that the TBH Joint Strategic Partnership Board agrees to such large-scale development within East Hampshire contributing towards the Project.

Whitehill & Bordon

WB2

The proposed extension to the 'Whitehill & Bordon' site lies approximately 430m from Broxhead and Kingsley Commons, a component part of the Wealden Heaths Phase 2 SPA. The RSPB considers the proposed Broxhead SANG wholly inappropriate given that it lies immediately adjacent to and bordering Broxhead and Kingsley Commons and has the potential to draw new residents to rather than away from the SPA. There are multiple routes, both PRow and other tracks, that link the proposed Broxhead SANG to the SPA. The promotion of the proposed Broxhead SANG could have the perverse outcome of increasing visitation to Broxhead and Kingsley Commons, potentially exacerbating recreational disturbance rather than mitigating it. If such a SANG were to be included it would create confusion regarding the role of SANGs and undermine perception of the need for SPA mitigation. Proposed housing relying on this SANG as mitigation should be removed from the Local Plan or an alternative SANG solution proposed.

The proposed Oxney SANG and Gibbs Lane SANG are 8.55ha net and 14.40ha net in size, respectively. Both are of narrow structure, and whilst no detailed walking routes have been provided, it seems extremely unlikely that they can accommodate a circular walk of 2.5km each. Networks of SANGs that may be able to accommodate longer and more varied visitor routes are desirable, but do not compensate for sites that fail to deliver attractive alternative space in their own right. Furthermore, the fragmented SANGs proposed will not be able to connect with green corridors in the current plans, and as such routes to connect the SANGs will mostly comprise routes through urban areas. These are unlikely to create a desirable alternative to the SPA for residents to use. Considering the above serious issues with the design and quality of the proposed SANGs, the RSPB considers that in its current form the Whitehill & Bordon residential expansion plans will not be able to adequately mitigate for residential disturbance impacts on, and thus integrity of, the Wealden Heaths Phase 2 SPA as required under the Habitats Regulations.

Question 9 – Relationship between Large Development Sites and the draft Local Plan (2017-2036)

In the RSPB's response to the East Hampshire District Council Draft Local Plan 2017-2036 (Regulation 18), we urged that significantly more detail was required concerning the implementation of strategic SANGs, SAMM and Habitat Infrastructure Projects. Policy S20 was lacking any real detail including their scope, location, capacity, delivery mechanism, ongoing management or monitoring for Wealden Heaths Phase 2 SPA.

The RSPB is concerned that no measures are proposed to reduce the effects of residents that choose to visit the SPAs (Thames Basin and Wealden Heaths Phase 1 & 2 SPAs) instead or as well as any on-site SANGs. We consider that such measures (including wardening and education) are essential to any SPA mitigation in this area. Should our concerns with the proposed SANGs in the identified large development sites (Land South East of Liphook, Northbrook Park, and Whitehill & Bordon) be addressed, the sites will not be able to fully mitigate for recreational disturbances to the SPAs (Thames Basin Heaths and Wealden Heaths Phase 1 & 2) through solely the provision of bespoke SANGs. Securing a strategy for SAMM that is embedded within the East Hampshire Local Plan would reduce resource burden on the Council and ensure that developers contribute equally and proportionately towards the same form(s) of mitigation.

In addition, the RSPB strongly urges that potential impacts to Thursley, Hankey and Frensham Commons as components of the Wealden Heaths Phase I SPA are considered appropriately. For this reason, we recommend that East Hampshire take this opportunity to extend policy S20 to include both the Wealden Heaths Phases 1 and 2 SPAs.

We hope you find these comments useful in informing a more appropriate and legally compliant approach to the protection of these important natural assets. We would welcome the opportunity to discuss these comments with you in further detail.

Yours sincerely



Conservation Officer

Email: [Redacted]

Phone: 01273 775333

SDNPA response to EHDC Large development sites consultation

[Redacted]

Tue 15/10/2019 16:20

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [Redacted]

📎 1 attachments (303 KB)

SDNPA response to EHDC large sites consultation.pdf;

Please find attached the SDNPA's response to your large development sites consultation. I would be grateful if you could confirm safe receipt.

Kind regards

[Redacted]

Planning Policy Manager, South Downs National Park Authority
South Downs Centre, North Street, Midhurst, West Sussex GU29 9DH
Tel: 01730 819284

www.southdowns.gov.uk | [Facebook](#) | [SDNPA Twitter](#) | [Ranger Twitter](#) | [Youtube](#)



Save the Bees!

Help reverse the decline of bees in the South East and create a haven for pollinators in the South Downs National Park. Support our Bee Lines campaign by visiting www.southdownstrust.org.uk/beelines/ and donate.

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

15 October 2019

Dear Sir / Madam

East Hampshire Local Plan 2017-2036 – Large Sites Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on your large sites consultation which is seeking to gather comments on the potential large development sites being considered, to help inform the identification of the chosen sites in the Proposed Submission East Hampshire Local Plan.

As you are aware, the SDNPA and all relevant authorities (including EHDC) are required to have regard to the purposes of the South Downs National Park as set out in Section 62 of the Environment Act 1995. The purposes are 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.'

We support East Hampshire's continuing liaison with neighbouring authorities, including the SDNPA, to ensure cross-boundary strategic priorities are fully addressed. I would take the opportunity to highlight the SDNPA's strategic cross-boundary priorities which provide a framework for these discussions and are the focus of this consultation response:

- Conserving and enhancing the **natural beauty** of the area.
- Conserving and enhancing the region's **biodiversity** (including green infrastructure issues).
- The delivery of new **homes**, particularly affordable homes for local people and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable **tourism**.
- Development of the **local economy**.
- Improving the efficiency of **transport** networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

Overarching comments

We welcome recognition of cross-boundary considerations which may impact the South Downs National Park (SDNP). The table on page 14 of the consultation document is a useful quick reference guide to this. We ask that the South Downs National Park Authority also be included for the Extension of Land East of Horndean (Hazelton Farm). We would also ask that the SDNPA boundary be included on all site maps. We consider that showing the administrative local planning authority boundary would provide useful context when viewing the maps for these sites.

Where sites contribute to the setting of the SDNP landscape evidence is necessary to inform capacity and design requirements. We advise that further work would be needed to provide evidence-based

numbers and evidence-led design will assist in avoiding and mitigating for adverse impacts on the National Park. To achieve this, settlement expansions which knit into the existing settlement pattern, have an appropriate transition to the countryside, and with characteristic mitigation, will reflect the countryside edge and role as part of the setting of the National Park. Evidence to feed into this work would include the South Downs Viewshed Study, the South Downs Integrated Character Assessment and Historic Landscape Characterisation. Experiential qualities are an important aspect in addition to views as reflected in the Landscape Character Assessment definition – these include tranquillity and dark night skies etc. There are also opportunities for multifunctional green infrastructure improvements, including connections for people and nature to and from the SDNP, which can be informed by landscape evidence.

The South Downs National Park is a designated International Dark Skies Reserve. Urban developments are a key determinant in reducing the sky quality and harming Dark Night Skies: this is more a function of the street lighting than spill domestic residences. Due to the proximity of the developments, it would be preferable that those sites closest to the boundary, for example Four Marks South, Liphook, are limited in number. This would limit the overall ambient lighting closer to the SDNP and help to protect the dark skies of the Reserve. We refer you to our Dark Skies Technical Advice Note which includes guidance on how development can avoid, minimise and mitigate to protect dark night skies. We are able to provide guidance on specific development requirements which could be included in policy to protect dark night skies and we would welcome the opportunity to work with you on this.

We are concerned that additional traffic arising from development will cause adverse impacts on rural roads; both those which form part of the transition between the built up areas of East Hampshire District and the SDNP, and those rural roads and villages within the SDNP itself. We ask that investigation of this matter on rural roads, including those within the SDNP is undertaken via traffic modelling and is included as part of Transport Assessment work to inform the emerging East Hampshire Local Plan. We would welcome the opportunity to work together in gathering evidence on this matter.

The potential provision for gypsy, traveller and travelling show people sites within these sites for consideration is welcomed. Landscape evidence and opportunities for plots and pitches to be well integrated would be welcomed in order to support decisions regarding any allocations.

In general the sites present opportunities to link communities with natural green spaces in the National Park, benefitting health and well-being. In line with the SDNPA Cycling and Walking Strategy we seek mainly opportunities to make connections via new or improved routes for walking, cycling and horse riding. In several places these routes already exist or partially exist and the development sites could present opportunities to fill in missing links or create new connections. The benefits include potential to reduce car traffic by providing alternative options for residents to access the National Park, and transport hubs such as railway stations.

All evidence base and strategy documents cited are found on the SDNPA website.

Whitehill and Bordon

The site for consideration in this Large Sites Consultation appears to be an extended version of Site SA11, Bordon Garrison, in the Draft East Hampshire Local Plan (EHLP), published for Regulation 18 consultation earlier this year, in February-March 2019.

Comments from the SDNPA were submitted as part of that Regulation 18 consultation and we consider these still stand. We are concerned that significant additional traffic will arise from this site which could impact on rural roads and villages in the SDNP. We request that this matter is also identified as a cross boundary consideration. We would expect the forthcoming transport assessment

to address this concern, and for design and mitigation measures put forward to be fully reflected in any final allocation policy.

The proposals involve allocation for new development within 5km of the Wealden Heaths Special Protection Area (SPA). It will therefore be essential that any allocations will be able to sufficiently mitigate to avoid harm to the Wealden Heaths SPA, including protection (and no undermining) of any existing Strategic Alternative Natural Greenspace (SANG) provision. There appears to be proposed residential expansion and SANG provision within close proximity (within 1km) of Shortheath Common Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) within the SDNP which has some existing use and pressure for recreation. The impact on this will need to be assessed to avoid adverse impacts.

Development in this area should seek the opportunity to deliver multifunctional GI and should seek to incorporate use of the old Bentley-Bordon railway as non-motorised user (NMU) route. The part of this route that falls within the SDNP is safeguarded for potential future use as an NMU route under Policy SD20 of the South Downs Local Plan (SDLP) as such we request that this matter is also identified as a cross boundary consideration. It is noted that the alignment of the railway appears to be just outside the current consultation area and suggest that it could be delivered initially as a standalone route connecting with the existing footpath in part of the Kingsley Quarry area. We ask that this area should be included in any future allocation of the site.

Land South East of Liphook

This site for consideration is located for a range of uses, including 600 new homes. It is noted that the site falls partly within the National Park, and the SDNPA in the planning authority within the National Park. The proposed land uses within the National Park are stated to be SANG and flood attenuation as indicated in the list of cross boundary considerations for this site.

We are concerned that the scale of the uses being proposed by the site promoter will have significant adverse impacts on the setting of the SDNP. The assessment appears to be reliant on screening and mitigation to account for impacts on the SDNP. In order to achieve this a landscape-led approach, with the associated necessary evidence, would be required which responds to the role of the site as part of the setting of the SDNP and responds to the settlement pattern of Liphook; this is likely to result in lower capacity for development than is currently being promoted. A quantum of development may be achievable on this site, but the scale and density currently promoted is not considered realistic, in particular, there needs to be a sympathetic rural transition/village edge.

Reference to improvements in walking and cycling routes to the village and station is supported. Specifically, we have concern that the existing overbridge at Devil's Lane would see an increase in motorised traffic and putting more vulnerable traffic at risk. A new overbridge for NMU's maybe needed to provide access into the town.

A constraint, and of concern, is the inclusion of part of Shufflesheeps Open Access Land in the development site. Open Access land can't be developed or put to other uses such as incorporated as part of the green space for the development. It should also be noted that the Sussex Border Path and Serpent Trail are in this location.

This site is mentioned in the endorsed Highfield Whole Estate Plan (WEP); the school is the owner of some of this land. The Estate refers to the site delivering a new school and recreational facilities such as sport pitches and green corridors. If this site were to be allocated in the Proposed Submission EHLP, reference should be made to the WEP and how such development can contribute to the Estate fulfilling their action plan, for example improving biodiversity, and supporting children's' experience of the 'outdoors environment', and improving NMU options to enable better access to the school linked with the school's wider Travel Plan, as well as supporting the purposes of the National Park.

Extension to Land East of Horndean (Hazelton Farm)

This site for consideration is an extension to the proposed allocation SA33 Land East of Horndean in the Draft EHLP. It is noted that the SDNP boundary is on the other side of the B2149 road.

Reference to views in the list of cross-boundary considerations is supported, however, there are experiential qualities in addition to views which are relevant for this site, including tranquillity and DNS. The land of this site is identified as Blendworth Common, which is characterised by the lack of settlement. This site has a role as part of the setting of the National Park and as such a landscape-led and landscape-evidenced approach would be required which responds to landscape character of the site and its role of the site as part of the setting of the SDNP; this is likely to result in lower capacity for development than is currently being promoted which is not considered realistic. Trees/hedgerow alongside the B2149 should be retained and, consistent with the comments made on SA33, any housing in this part of the site should be of an appropriate scale and density for a rural transition between the built up area of Horndean and the rural area of the SDNP, in order to avoid a hard wall of development.

Site SA33 lies immediately to the north and S31 (Havant Thicket) lies immediately to the south. In commenting on these allocation in the Draft EHLP consultation we sought a safe NMU link between the two however there was intervening land in between. If this site were to proceed to allocation, there is opportunity for this link to be realised. The promoters show indicative routes, however if this site were to proceed to allocation, such a route should be formalised to provide full NMU access and confirmed links to Havant Thicket.

Other important opportunities for NMU improvements include connectivity to Rowlands Castle Railway Station (preferably by an off highway segregated solution, either adjacent to the B2149 or through the forestry 'The Holt'), Staunton Country Park and in and around A3M Junction 2.

Northbrook Park

This site for consideration is of a similar area to that proposed for allocation in SA21 of the draft Local Plan, with notable extension to the north east to the south of the A31. We provided comments on SA21 as part of the previously Regulation 18 consultation and these comments also apply to this iteration of the site area and the site promoters proposals.

The list of cross-boundary considerations make no reference to the SDNP which is a significant omission. We have concerns regarding the following potential impacts relevant to the National Park:

- The overall impact on the setting of the SDNP, given proximity to the boundary;
- Potential adverse impacts on SDNP landscape setting, for example as experienced from the Alice Holt Forest, surrounding rights of way, and approaches to the SDLP from the north;
- Potential to impact on Dark Night Skies, noting that most of Alice Holt Forest is within the Dark Sky Buffer Zone EI(a);
- Potential impacts on ancient woodland and riparian ecological systems that lie within the area.

Should this site be progressed to an allocation, evidence to address the above will be required to inform policy and design in order to avoid and/or mitigate any adverse effects. To do this, a landscape-led approach would be required. The site has characteristics of designed landscape/historic parkland and as such landscape evidence is likely to suggest a lower landscape capacity for development at this location. Any policy should include requirements that development does not harm views from the National Park, with regards the siting, scale, height, design and light pollution with respect to Dark Night Skies.

We strongly recommend that built development is kept away from the southern portion of the site (i.e. the land to the south-east of the A31) in order to retain a landscape/transitional buffer.

Development on either side of the A31 would not respond to the settlement pattern and would bisect the new community. This southern area could function as the SANG required to support any housing development. Approximately half of this southern portion of the site is within floodzone 2 and 3 which is a further reason to keep development away from this side of the road.

There are opportunities for landscape and access enhancements to the southern area which should be secured by the policy. Sensitive recreation use could be appropriate based on restoring semi-natural habitats.

Development of the site should incorporate means of access to Alice Holt/SDNP by means other than private car. There is currently a footpath linking with Holt Pound Lane which should be considered for upgrade to allow for full access by NMU, incorporating a safe crossing of the A31. Reference to a new pedestrian bridge over A31 in the list of infrastructure provision suggested by the promoter is supported.

Chawton Park

This site for consideration is proposed by the site promoter for a range of uses including 1200 homes. We support reference to landscape setting and views into and out of the National Park in the list of cross-boundary considerations. Whilst the woodland adjacent to the site limits views to some degree, the land of the site rises to the north and there will be visibility from/to the SDNP. The site is located in a historic landscape with historic farmsteads associated with an emparked landscape. Capacity of the site should be informed by landscape evidence.

Development at this location risks severing the connectivity between the two areas of Open Access site woodlands to the north and south, especially in the context of the scale of development proposed. If this site were to proceed to allocation, capacity and development requirements would need to address this. There is an area of ancient semi-natural woodland within the site to the south; this should be excluded or its retention appropriately addressed in policy.

Improvements to sustainable links to Alton listed as infrastructure being suggested by the site promoter are supported. Regional Cycle Route 224 may be lost as a result of the scheme and any replacement route should be segregated from the new highway, connecting the site to the hospital and beyond to Alton Station. Links to National Park could be via Wickham to Alton disused railway line which is a route safeguarded in Policy SD20 of the adopted South Downs Local Plan, as such this matter is also a cross-boundary consideration.

Neatham Down

This site for consideration is proposed for a range of use by the site promoter including 600 new homes. We support reference to landscape setting and views into and out of the SDNP listed under cross-boundary considerations. The site is not well related to the existing built up area of Alton and would extend built form over the A31 and encroach into the rural transitional landscape between Alton and the National Park. Views will need to be checked from King John's Hill and other NP locations, and design should account for these views.

There are various wildlife designations (including SAC) nearby within the SNDP which do not appear to have been identified by the site promoter.

Four Marks South

We support reference to landscape setting and views into and out of the SDNP listed under cross-boundary considerations. Please see overarching comments for further detail on constraints, infrastructure and approaches to address these.

Land South of Winchester Road, Four Marks

Please see overarching comments.

South Medstead

Please see overarching comments.

West of Lymington Bottom Road, South Medstead

Please see overarching comments.

Summary

The SDNPA has a number of concerns, as set out above, which we consider should be addressed in full where these sites to be taken forward to allocation in order to make sure that the Pre-submission version of the Plan is sound. The SDNPA reserves its final view on whether the proposed development is supportable in principle, pending the outcome of the concerns highlighted above being addressed. We can confirm that we are committed to continued liaison and joint working towards achieving effective outcomes in this respect.

Notwithstanding the above concerns and requested changes, we would like to wish you well in the progression of your Local Plan. If you have any questions on the content of this letter, please do not hesitate to contact me.

Yours faithfully



Planning Policy Manager

Response from The Ramblers to the Large Development Sites Consultation - land East of Horndean (Hazelton Farm)

Tue 15/10/2019 18:21

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

We would be grateful if the comments below be considered in response to your consultation on possible large sites for development:

On behalf of the SE Hampshire Branch of The Ramblers the following comments are submitted in response to the inclusion of land East of Horndean (Hazelton Farm) as a site included as part of the Large Development Sites consultation.

While acknowledging that the site being considered would represent an extension to the large site already included in the current East Hampshire DC Local Plan (Site HN1), concern is raised given the proximity of this site to the Local Nature Conservation Designation site opposite, The Holt, and the Havant Thicket SINIC.

The Holt is directly opposite the proposed large development site, on the other side of the B2149 and is within the South Downs National Park. The boundary of the National Park runs along the B2149 at this point and therefore the policies that apply to the National Park here need to be borne in mind, in particular Strategic Policy SD9: Biodiversity and Geodiversity (from South Downs National Park Local Plan adopted July 2019).

The supporting statement to SD9 highlights the importance of trees and hedgerows:

Trees, woodland and hedgerows are distinctive features of the National Park. Non-woodland trees, including those in hedgerows and street trees, make an important contribution to landscape character, the historic environment and ecosystem services. Hedgerows, in particular, have an important role, by providing connections between habitats, and these need to be managed and maintained.

The proposed development, as illustrated in the supporting documents, indicates that the hedgerow and trees that border the site along the B2149 would be lost and that a major road junction would be introduced at this point, directly opposite The Holt. This would represent a significant detrimental impact on the area as well as conflict with the expectation of the policy SDP in respect of new development. Therefore it is requested that the site as proposed excludes the section that abuts the B2149 in order ensure that the existing hedgerow and trees are protected and allow for the enhancement of this part of the site to help screen the new development should it proceed on the remaining area.

The proposed development site 'fills' the gap between the HN1 site and Havant Thicket. In doing so there is a risk that the new housing will affect the character of Havant Thicket. To minimise the potential impact, the site boundary should ideally be set well back from the woodland. However, Havant Thicket is a well used area for walking and therefore it is important for the connections to it, for walkers especially, be given careful consideration in order to manage access to the

woodland. Similarly, connections to the existing footpath network to provide access to Havant Thicket need to be provided, avoiding the use of pavements alongside estate roads.

Previously, when commenting on the HN1 site, The Ramblers noted that there was an opportunity to use the existing farm track that goes east from the A3(M) motorway bridge to be kept and designated a bridleway to give easier access to the National Park from Cowplain. This farm track is at the northern boundary of the proposed development site and therefore the comment is repeated and the importance of linking this to facilities for walkers etc. within the site emphasised, again, avoiding the need to use estate roads.

To conclude, should this site be included for development in the future, it needs to reflect the importance of its setting on the boundary with the South Downs National Park. This would require a reduction in the area to be allowed for development to ensure that existing trees and hedgerows are protected and the opportunity for the enhancement of the landscape be available. Also, that the road access point be moved. At the same time, provision for access to Havant Thicket be made to ensure that a coherent footpath network is available that links areas both within and outside the proposed site.

Thanks



Walking Environment Officer (The Ramblers SE Hampshire Branch)

RE: EHDC Local Plan (Large Development Sites Consultation)



Tue 10/09/2019 15:39

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Hello

Thank you for providing SGN the opportunity to comment on the EHDC Local Plan (Large Development Sites Consultation)

As there won't be a significant change in the amount of homes, it is unlikely that the highlighted development will affect SGN's current strategy, however the below should be noted:

STATUTORY OBLIGATIONS

Where required, SGN will look to manage the provision of any off site infrastructure improvements, in line with the overall development growth and / or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for the IPMP networks, and will only become clear once a developer's request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN's existing mains system, but may also include the installation of above ground apparatus involving land purchase.

As this is a high level assessment and response, the information provided is indicative only and should be used as a guide to assist you on your assessment. While information obtained through consultation and / or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. Our principle statutory obligations relevant to the development of our gas network arise from the Gas Act 1986 (as amended), an extract of which is given below:-

Section 9 (1) and (2) which provides that:

9. General powers and duties

- (1) It shall be the duty of a gas transporter as respects each authorised area of his:-
 - (a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and
 - (b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him -
 - (i.) to connect to that system, and convey gas by means of that system to, any premises; or
 - (ii.) to connect to that system a pipe-line system operated by an authorised transporter.

(1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.

- (2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination -
 - (a) in the connection of premises or a pipe-line system operated by an authorised transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.

SGN would not, therefore, develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests.

As SGN is the owner and operator of significant gas infrastructure within the area and due to the nature of our licence holder obligations;

- Should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer.
- Should major alterations or diversions to such infrastructure be required to allow development to proceed, this could have a significant time constraint on development and, as such, any diversion requirements should be established early in the detailed planning process.

SGN would therefore request that, where the Council are in discussions with developers via the Local Plan, early notification requirements are highlighted.

Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure. Again, where the Council are in discussions with developers via the Local Plan, we would hope that these early notifications requirements are highlighted.



SGN, Axis House, 5 Lonehead Drive, Newbridge, EH28 8TG

sgn.co.uk

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From: EHDC - Local Plan <LocalPlan@easthants.gov.uk>
Sent: 03 September 2019 11:24
Subject: EHDC Local Plan (Large Development Sites Consultation)

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 Please do not open any attached files or click links if it's not expected.

Good morning

Notice of Consultation on the East Hampshire Local Plan (Large Development Sites Consultation)

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is consulting on the new Local Plan 2017-2036. The new Local Plan 2017-2036 provides a policy framework for planning and development for the areas of the district that lie outside of the South Downs National Park.

The Council invites you to make representations in regard of the scope, subject and contents of the Local Plan.

The consultation focusses on 10 strategic sites which could be allocated in the new Local Plan in line with its emerging spatial strategy. Comments are being sought on each of the sites to help inform decision about which sites to allocate within the Proposed Submission Local Plan (Regulation 19).

This Local Plan Large Development Sites is available for public consultation for a period of six weeks between 3 September 2019 and midnight 15 October 2019.

Consultation documents and comment forms can be found and completed online via the Council's consultation page at <http://www.easthants.gov.uk/draft-local-plan>.

Where possible, comments should be submitted electronically via our online portal: <https://easthants.oc2.uk/>. Where this is not possible comments can also be emailed to localplan@easthants.gov.uk or posted to Planning Policy East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

If you have any enquiries regarding the Regulation 18 Local Plan Large Development Sites consultation, please email localplan@easthants.gov.uk or call 01730 234102 and a member of the Planning Policy Team will be able to assist.

Kind regards

The Planning Policy Team



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Scotland Gas Networks plc (company registration number SC264065) is registered in Scotland and has its registered office address at Axis

House, 5 Lonehead Drive, Newbridge, Edinburgh EH28 8TG

Large Development Sites Consultation - Response from the South and East Liphook Residents' Group.

[REDACTED]
Tue 08/10/2019 20:50

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: Glass, Angela <Angela.Glass@easthants.gov.uk>; Mouland, Bill <Bill.Mouland@easthants.gov.uk>; Standish, Rebecca <Rebecca.Standish@easthants.gov.uk>; [REDACTED]

📎 1 attachments (34 KB)

SELReG Large Site Response v3.docx;

Dear Sir

Please find attached the response to the Large Development Sites Consultation from the South and East Liphook Residents' Group.

Please confirm safe receipt.

Regards

[REDACTED]
South and East Liphook Residents' Group

*The **South and East Liphook Residents' Group** is an amalgamation of the Action Groups that opposed the proposed developments at Chiltley Farm, in Chiltley Lane and in Devil's Lane. It brings together the views of over 150 households in the south and east of the Village. While not entirely opposed to developments in that area, the Group is keen to support well considered solutions that are good for the Parish of Bramshott and Liphook as a whole, and object to any that are not.*

Submitted by Richard Beynon on behalf of

South and East Liphook Residents Group

9 Willow Gardens, Liphook, GU30 7HY

Email Address: Richard.Beynon@Examconsultants.co.uk

7th October 2019

Introduction.

This response is made on behalf of the South and East Liphook Residents Group (SELReG), consisting of around 180 households. Their views have been sought and have been compiled to make this response. The overall sense in the Group is one of disappointment that, despite the strong opposition of EHDC to developments in this area of Liphook 3 years ago (on the grounds of lack of sustainability or of any tangible benefits to the community), this time the proposal is being supported when it is clear that nothing has changed. Detailed comments are below.

Executive Summary

SELReG strongly **OBJECTS** to this proposed development. The proposed development is poorly conceived with no benefits to the community but will have a grave impact on the lives of Liphook residents, not just those living nearby but to all in the village. Its poor location (at a considerable distance from the centre and main amenities such as schools) means that it is unsustainable and will be a “car-led” development. It will significantly increase the traffic and car journeys into and across the village, many of them being across the dangerous railway bridge. The sustainability offerings, such as bus provision, “cycle routes” and a SANG site are barely a token attempt to offset these very real issues, and their lack of meaningful substance is viewed with contempt by anyone who actually knows the village.

The proposal is disingenuous, seeking to give the impression that the proposed school has support from the main Liphook Schools - Bohunt School and Liphook Junior School - when they have not even been consulted, and the statement that this would be an annex to these schools is misleading and wrong. Moreover, there is no requirement for additional schooling, support or funding from the Department for Education (DfE).

Key current concerns such as sewerage, electrical power and flooding have not been addressed at all and any development of this scale will inevitably lead to greater problems in these areas. A development of this size is simply not suitable in the proposed location especially when other better options exist. Several of the other sites in the EHDC area are able to demonstrate better access, closer proximity to main roads or are located on brown field sites and with less local impact.

Overall this is a very poorly planned and conceived proposal for 600 houses in Liphook with no tangible benefits to the community and many significant challenges. Its poor location and isolation from facilities and distance from the strategic road network will have a serious impact on local roads and infrastructure and the proposal is unable to provide the mitigation measures to overcome these very serious issues. It is deeply unpopular and lacks any support across Liphook and for all these reasons it is strongly recommended that it is not taken further.

Detailed comments referring to the questions now follow.

1. QUESTION LP1: PROPOSED USES.

- 1.1. The proposed mixed use for the site is unsuitable. It is not suitable for any other purpose except housing due to its distance from the strategic road network and specifically from the A3.
- 1.2. All access to the site would have to be via Liphook village centre (which is already very congested) and the narrow and inadequate “feeder” roads Highfield Lane, Chiltley Lane or Willow Gardens.
- 1.3. Much of the site is presently used for farming (either arable or chicken farming), this food producing land would all be lost in the event the development was allowed to proceed.

2. QUESTION LP2: INFRASTRUCTURE PROVISION

- 2.1. The proposals make a number of vague suggestions for the provision of additional infrastructure as part of the development. Considering these in turn:
 - 2.1.1. Local schools:
 - a) The proposed new primary school would not be required as the current schools in the village all advise they have ample capacity for additional children.
 - b) However, this would mean that those current schools would have many more children attending. Given the distance from this site to them (approximately 2.7km), cars will inevitably be used for transport adding to traffic congestion at peak times in the village centre.
 - c) The suggestion that the school would be an annex to Bohunt School is misleading and extremely disingenuous and this attempt to latch onto the reputation and drawing power of the school to give more credibility is seen as cheap and disreputable from the developers
 - d) The proposal does not give due regard to the long distance to the main schools in Liphook (Bohunt and Primary) but mentions the two nearby private prep schools to which few children from the development would go to.
 - 2.1.2. Bus routes:
 - a) Liphook is only served by the number 13 service which runs through the centre of the village but not out as far as the proposal area.
 - b) The local service (number 250) only runs 3 mornings a week at non-peak times and is under threat of withdrawal. It would be of no use as a commuter or school bus anyway as there are no return services later in the day.
 - c) There are no bus services in or around Liphook on Saturdays or Sundays.
 - d) There are no proposals to improve these services.
 - 2.1.3. Suitable Alternative Natural Greenspace (SANG):
 - a) The SANG associated with this proposal is neither on the development site nor even in East Hampshire, but instead is in West Sussex and the SDNP, 1.5-2km from the development with access via roads with no pavements.
 - b) It is already crossed with public footpaths and so is not a new open space but a development of an existing accessible area.

- c) Although it is in private hands, public access to this area has already been continuous for over 50 years so this would not be a true community gain.

2.1.4. Walking and Cycle Routes:

- a) Proposed “improvements” to walking and cycle routes are limited to the provision of only one route to the village centre and its facilities. However, this route is already a footpath used by existing residents but, in parts, is totally unsuitable for use as a cycle route due to very narrow pavements and narrow roads with poor sight lines.
- b) Without a new foot and cycle bridge over the railway line, to link up with the existing foot and cycle way to the village centre, this development cannot go ahead, as it would be unsustainable and against NPPF and EHDC policies to:
 - (a) Minimise car use,
 - (b) Promote walking and cycling and
 - (c) Ensure new developments integrate with the existing community.

Enquiries to the developer led to being advised that its provision would be “too expensive”.

2.1.5. Sports Facilities:

- a) The proposals suggest new football pitches for Liphook United Football Club. However, their proposed location is in an area of the site that regularly suffers flooding during the winter months.
- b) One might suggest that these facilities are only being offered in areas where additional housing cannot be provided because of flooding and/or railway noise.

2.2. **CONCLUSION** - The proposals make no mention of any infrastructure provision that would mitigate the increased traffic that would inevitably be suffered in the already congested Liphook Village Square. This is considered further in Section 3, below.

3. QUESTION LP3: CONSTRAINTS

- 3.1. The site sits between the existing settlement policy boundary and the SDNP boundary. It borders the SDNP along a large proportion of its boundary and a small section of the site is actually within the SDNP. Major development this close to, and within, the SDNP will have a dramatic effect on the setting of the SDNP and views into and out of the park.
- 3.2. The site is within 5km of a Special Protection Area (SPA) and within metres of a Site of Importance for Nature Conservation (SINC). There are various protected trees on the site and the development will have an adverse effect on the setting of Lychgate and Goldenfields West, both Grade 2 listed buildings.
- 3.3. The western section of the site, alongside the railway line, suffers from surface flooding during periods of heavy rainfall. At times, even the railway line itself is flooded. The risk of flooding will be increased by covering the present green spaces with concrete and tarmac.
- 3.4. It should be noted that this proposal was not identified as a suitable site in the EHDC interim Sustainability Appraisal (SA) report due to its constraints and the impact its development would have on the local road network, infrastructure and landscape. There

has been no material change since that report so surely the site still remains unsuitable for development.

- 3.5. Existing residential areas neighbouring this proposed development already suffer problems with inadequate sewerage infrastructure and regular electrical power cuts. It is feared that without significant improvements, any further substantial development in the area would exacerbate these problems. The recent refused development proposal at Chiltley Farm had a Grampian condition imposed by Thames Water due to inadequate waste water capacity. That was for 100 homes so a proposal for 600+ homes would be unable to connect to the existing sewage network.
- 3.6. The location of the site raises serious issues regarding access and the management of the additional traffic the development would cause. Detailing these issues:
 - 3.6.1. The site lies outside the settle boundary to the southeast of the village and is separated from the village by the railway line. Access to this area is only via narrow railway bridges. The proposal shows 3 access points which would have to use these narrow bridges to access either the village and/or the A3. None of these bridges are adequate for this task.
 - 3.6.2. Regarding access points:
 - a) The proposed access point to Willow Gardens is not suitable. Willow Gardens is part the Berg Estate which is identified as a site of special housing character and as such is protected under EHDC's Draft Local Plan. Using Willow Gardens as an access point would be in conflict with EHDC Draft Local Plan policies S29, DM30, and DM5.
 - b) It is also worthy of note that the exit from the Berg Estate on to the Midhurst Road (which would have to accommodate traffic exiting the development area via Willow Gardens and Highfield Lane), is now to have double yellow lines installed due to the dangerous nature of the junction. This would be made worse by increasing the amount of traffic using it. The proposals make no mention of upgrades to this junction or Midhurst Road as a whole.
 - c) The other two proposed access points are actually on to roads/lanes in West Sussex and the South Downs National Park (SDNP). These access points will require major changes to the road layout to accommodate the increase in traffic and will have an adverse effect on the setting of the SDNP. They will also be in conflict with the SDNP's dark sky policy due to the dramatic increase in street lighting required.
 - 3.6.3. Regardless of which of these access routes are used, the vast majority of traffic from this development will pass through the village centre to access the A3. This is already over capacity, and the increased number of children attending both Bohunt and the Junior and Infant schools would further exacerbate this problem.
 - 3.6.4. Due to its location, with poor walking and cycling links, the proposal will have a serious impact on the local road network, particularly the centre of the village at school time. The centre of the village is a conservation area and as such, should be protected from increased traffic and congestion. Any increase in traffic and congestion in the village centre conservation area is in conflict with EHDC Draft Local Plan policies to protect and enhance the conservation area.
 - 3.6.5. The developer promotes the nearby railway station as a sustainable means of transport. The "10 minute walk or 3 minute cycle" from the development is in

reality double or treble depending on the specific start point. This would result in many commuters using cars to access the station, so it cannot be claimed that access to the railway station would mitigate the increased local road traffic.

- 3.6.6. All this means that this development would inevitable be a “car led” development which would significantly increase local congestion. This would be in conflict with the National Planning Policy Framework (NPPF) paragraph 109, NPPF paragraph 72 and EHDC Draft Local Plan Core Objective “B” and Policy S:29.
- 3.7. **CONCLUSION** - The proposal makes no mention of any major road, sewerage, flooding or electrical power infrastructure improvements to mitigate the issues highlighted above. To accommodate a development of 600+ homes some form of new road system in the village centre would be required to mitigate the effect of the additional traffic generated. This new infrastructure would have to be in place before housing construction took place. In reality, no major road infrastructure improvements are possible due to the layout of the current road system within the village. Therefore, a development of this size is not suitable in the proposed location.

4. QUESTION LP4: OPPORTUNITIES AND BENEFITS

- 4.1. If the proposal were to go ahead it would provide affordable housing and the possibility of new football pitches for the community. Unfortunately, these opportunities are far outweighed by the serious impact the development would have on the local area and its infrastructure, as detailed in Section 3.

5. QUESTION LP5: CROSS BOUNDARY CONSIDERATIONS

- 5.1. The main access points to the proposal lie within West Sussex and the SDNP. Both authorities will require consultation and will likely have issues with the proposed access points. A large development of this kind adjacent to the SDNP will have an adverse effect on the setting of the Park.
- 5.2. The proposed SANG is within the SDNP and would require significant road, access and parking improvements.

6. QUESTION LP6: DELIVERABILITY

- 6.1. The proposals to develop the site from southwest to northeast would be unacceptable as it would result in construction traffic using existing minor roads and residential roads, including roads that provide access to two schools.
- 6.2. If this proposal was allowed to go ahead it should only be when upgrades to the local road network have occurred and even then, construction should only be allowed to take place from northeast to southwest, using only the new site access from the Haslemere Road.

7. CONCLUSION

- 7.1. The proposal for 600+ homes south east of Liphook is the worst performing site of the 10 sites included in the Consultation.
- 7.2. It is poorly located for access to the strategic road network, is isolated from the existing community by the railway line, will have a serious adverse effect on the local road and other infrastructure networks and will exacerbate the traffic congestion and pollution in the village centre conservation area.
- 7.3. Two of the proposed access points are into the SDNP, affecting its setting, and the proposed SANG is also within the SDNP, is remote from the site and difficult to access by safe walking or cycling routes.
- 7.4. The development proposal is unable to provide mitigation measures to overcome these very serious issues.

8. COMMENTS ON OTHER PROPOSED LARGE SITES

- 8.1. Other than Liphook, all the other large sites under consideration have direct, easy and convenient access to the strategic road network.
- 8.2. Whitehill and Bordon (WB): the proposals are the best of the 10 sites presented. Much of the land is brownfield and has good access to all the new infrastructure and facilities presently being provided. Immediate access to the new A325 relief road and far more local employment opportunities available. This one site could provide all the required housing numbers outstanding in the EHDC local plan.
- 8.3. East of Horndean (HD): the proposals are an extension to the existing allocation. Immediate access to the A3(M) and nearby Waterlooville, Portsmouth provide all facilities required. Easy access to local schools and shopping with walkable links into existing accessible open space.
- 8.4. Northbrook Park (NBP): the proposal is the most well-planned development of the 10. An independent, mixed use development with immediate access to the strategic road network (A31). Planned cycle and bus network to nearby Farnham should help reduce the reliance on the private car and give sustainable access to the railway station.
- 8.5. Chawton Park (CP): the proposal could provide all the outstanding housing numbers in the local plan. Immediate access to the strategic road network (A31) will be possible after currently ongoing upgrades to the railway bridge are completed. Some distance from the railway station and town centre but this could be overcome with improved public transport.
- 8.6. Neatham Down (ND): the proposal does encroach into the countryside and seems remote from the town centre. Immediate access to the strategic road network (A31) but some distance from the railway station.
- 8.7. Four Marks South (FMS): the proposal appears to be a form of back land development extending the village further into the countryside. No immediate access to the strategic road network and if permitted, the proposal would require large infrastructure upgrades to ensure integration into the community.
- 8.8. South of Winchester Road, Four Marks (SWR): the proposals are an extension to the ribbon development of Four Marks west along the A31. Immediate access to the strategic road network (A31) but remote from the village centre.

- 8.9. South Medstead (SM): the proposal will result in the loss of identity for Medstead, removing any strategic gap between Medstead and Four Marks. Poor access to the strategic road network (A31) via a railway bridge. Will require extensive infrastructure upgrades to allow easy access and integration into the existing settlement.
- 8.10. West of Lymington Bottom Lane (WLB): the proposal will result in the loss of identity for Medstead, removing any strategic gap between Medstead and Four Marks. Poor access to the strategic road network (A31) via a railway bridge. Will require extensive infrastructure upgrades to allow easy access and integration into the existing settlement.

9. QUESTION OQ8: LARGE SITE ASSESSMENT

- 9.1. The large site assessment does not give enough importance to the potential impact of the proposed sites on the existing communities, especially the local road network, infrastructure and facilities. Without easy access to the main strategic road network a development of 600+ homes will have a devastating impact on local roads, narrow country lanes and village centres. Any large development site must have direct, easy and convenient access to the strategic road network (in the case of East Hampshire the A3/A3(M), A31 and A325).

10. QUESTION OQ10: COMMENT ON LARGE DEVELOPMENT SITE CONSULTATION

- 10.1. The consultation drop in events should have been located in all the communities that could be affected by the 10 proposed sites, to enable local residents' easy access to them.
- 10.2. The use of the online portal restricts the user's ability to fully convey their comments as each section only allows up to 100 words. It is also particularly difficult to use even by those who are computer literate.
- 10.3. The online questionnaire document was likewise difficult to use as its formatting and accessibility resulted in numerous mistakes and limited space for commenting.
- 10.4. The fear is that many people who wished to make comments have been unable to navigate the options and have, reluctantly, given up. As it was not specified, they would not have realised they could simply send their written response via email.

Consultation: Large Development Sites for Local Plan

[REDACTED]@southdownssociety.org.uk>

Thu 10/10/2019 15:27

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: PlanningPolicy <PlanningPolicy@southdowns.gov.uk>; A [REDACTED]
[REDACTED]@southdownssociety.org.uk>

📎 1 attachments (706 KB)

SDS-Comments_EHDC_10-10-19.pdf;

Dear EHDC Planning,

Cc: SDNPA Planning Policy

Please find attached our comments on the EHDC Large Development Sites for Local Plan.

Thank you

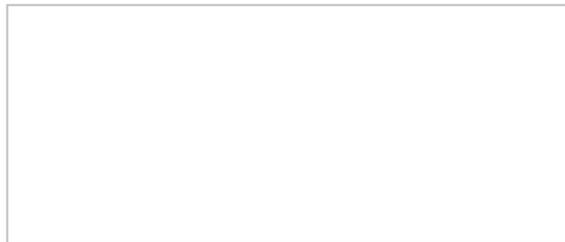
Kind Regards

[REDACTED]
Policy Officer

T: 07788 720929

[REDACTED] [southdownssociety.org.uk](mailto:[REDACTED]@southdownssociety.org.uk)

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Friends of the South Downs

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"Friends of the South Downs" is a brand name of the South Downs Society

Registered Office: 2 Swan Court, Station Road, Pulborough, RH20 1RL

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Office hours are Monday to Wednesday - 9am to 1:30pm (not including Public Holidays)

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Click on the image or [HERE](#) to sign up.



Protecting the beauty of the Downs

Planning Policy
East Hampshire District Council
Penns Place
PETERSFIELD
Hants GU30 4EX

by email to: localplan@easthants.gov.uk

Cc: SDNPA

Date: 10/10/19

Dear Sir/Madam,

Consultation: Large Development Sites for Local Plan

These are the comments of the Friends of the South Downs (South Downs Society) on the above mentioned plan. The Society has over 1,500 members and its focus is campaigning and fund raising for the conservation and enhancement of the landscape of the South Downs National Park (SDNP) and its quiet enjoyment. We comment on planning applications made in, or close to, the SDNP.

Thank you for giving us the opportunity to comment on this plan. Our comments are set out as attached.

Yours faithfully,


Policy Officer

SOUTH DOWNS SOCIETY

Tel: 01 798 875073 Email: enquiries@southdownssociety.org.uk www.friendsofthesouthdowns.org.uk

"Friends of the South Downs" is the brand name of the South Downs Society, a company limited by guarantee, registered no. 319437 and is a registered charity no. 230329. The Society is an independent charity which relies on member subscriptions and gifts in wills.

Registered Office: 2 Swan Court, Station Road, Pulborough, West Sussex RH20 1RL

Date: 10/10/19

Subject: Consultation: Large Development Sites for Local Plan

Planning area:

The EHDC planning authority area consists of 3 geographically separate parts of Hampshire – two in the north and one in the south of EHDC area. The planning authority for the larger remaining area of EHDC is the South Downs National Park (SDNP).

Identifying potential 'large sites' for consultation

1. Paragraph 2 of the Background Paper explains how the current 10 candidate sites have been identified. We do not consider that relying largely on landowners & their developers to put forward candidate sites is the way to select suitable locations. The allocation of land for housing introduces commercial interests and often developers will put forward large greenfield locations – as indeed appears to have happened in this case; only one – **Bordon** - is anywhere near a brownfield site. We would prefer to see short-list selection by a process of systematic and expert site-search (of EHDC's three areas) to seek out the professionally appropriate candidate sites, and not necessarily all 'large sites'.
2. For most of the EHDC administrative area the planning authority is of course the South Downs National Park Authority. It is well known that the SDNP decided against new large housing estates in favour of distribution in smaller packets throughout its area in a locally suitable and sustainable fashion (see SDNP policy 25 & 27). All 10 sites are either on or very near the boundary (see map in Appendix B attached) of the National Park; we suggest that the better practice is for EHDC to follow the SDNP's lead: avoid new large urbanisations in favour of smaller sustainable sites. Incidentally we do not consider that the advice at paragraph 72 of the NPPF applies necessarily or slavishly to the immediate vicinity of our National Parks which of course have the "*highest status of protection*"¹.

Infrastructure

3. Pages 7-10 of the Background Paper are devoted to this essential subject however the pages contain no evidence or analysis of earlier investment of developer contributions. There have been nearly 4,000 EHDC completions since 2011/12² and the figure will be far higher should the period be extended back to say 2000? Where has this money been invested? In our view fresh development should follow - or at the least be informed with - the earlier investment in development infrastructure?

¹ NPPF para 172

² EHDC 5yr Housing Land Supply position statement July 2019 Table 1

4. The Local Plan evidence base is however silent as to where developer money has been invested and on what. The sums of money are surely sizeable and should be revealed and used? Just one quite recent development of 128 dwellings at Liphook (Silent Gardens – EHDC/26295/007) yielded nearly half a million pounds in Transport contribution and the committee report³ gives £1.3M for primary and secondary education contribution. If we knew where these developer sums have gone it might surely help or guide the decision-making process for where further dwellings are appropriate?

Choosing the most appropriate SUSTAINABLE sites for housing development

5. We would commend the report and 'checklist' by Transport for New Homes whose aim is that new developments should be linked to sustainable transport networks leading to traffic reduction, in order to address climate change and congestion as well as to provide good, healthy living environments. For more information, see: <http://www.transportfornewhomes.org.uk/the-project/checklist-for-new-housing-developments/>

Greenfield / Brownfield

6. Just one of the ten – Bordon – might be considered 'brownfield'. We are very concerned that there is no analysis or reasoned effort towards finding suitable brownfield ground, albeit probably in smaller packets throughout your area. Cheap large building sites on greenfield ground was – we had hoped – a thing of the past.

Climate change

7. Better analysis of this subject is necessary in our view. We reproduce in Appendix A below a summary of the government advice on the topic. The EHDC Climate Change Champion Cllr Ginny Baxall is surely encouraging everyone to greater things on this front? It is a serious and urgent subject, and need not be rocket science in our view. Practical application will take the form of greater effort on matters that are well understood already – use of brownfield ground, higher standards for thermal insulation, water & energy conservation etc and, in this case, real attention to conserving and enhancing the special qualities of the National Park. No damage at all to Dark Skies. As well as preparation for the well-known oncoming events as the ending of domestic gas boilers and the use of electric vehicles. The Background paper is too thin on evidence of effort on this subject in our view.

Other

8. It is beyond our capacity to examine every detail of all ten of your candidate sites, however some details particularly struck us while we formulated this response to you; these are as follows and are **examples** of the points of detail that we would expect to be examined, namely:
 - i) **Bordon** – Use of any of Broxhead Common as a SANG should not be taken forward. The Common is an SSSI or a Sites of Importance for Nature Conservation (SINC) and in our view completely unsuitable for conversion to

³ EHDC 26295/007 Committee report 28/10/10 "page 48".

SANG. In short, are SANGs actually succeeding in diverting visitors (and their dogs) away from Special Protection Areas (SPAs)? We do not want the Broxhead Common SSSI/SINC damaged in this way – but retained for its own natural benefits.

- ii) **Liphook** – the access routes will channel most of the candidate’s traffic into the Village Conservation Area: thereby causing damage & pollution (e.g. noise) to the conservation area and loss of amenity for residents of the conservation area and visitors to the cafes & facilities of the District Centre. Damage to a conservation area should not be permitted.
- iii) **SANGs** – Generally there seems to be insufficient knowledge of the development and practical use of a SANG. We would like to see, by now, some expert evidence of the effectiveness of these features in order that any further SANGs will be sound development and will be effective.
- iv) **Affordable Homes** – we hope you consider reflecting the approach in Section 7C of the SDNP Local Plan and their policy SD28.

Conclusions and Summary

9. These are: -

- a) The Society is against new large urbanisations on or near the South Downs National Park.
- b) We should like to see greater effort for the use of brownfield ground, with minimal use of greenfield land.
- c) Details of say 20 years of developer contributions by amounts, location and type of contribution; with analysis of how this industry investment can continue to be used to optimum effect.
- d) EHDC should follow the SDNPA’s lead in favour of sustainable development. In particular, we would refer you to the SDNP Local Plan Objectives 4 to 8 in Section 7 ‘Towards a Sustainable Future’ in the SDNP Local Plan.

Appendix A & B attached

Appendix A

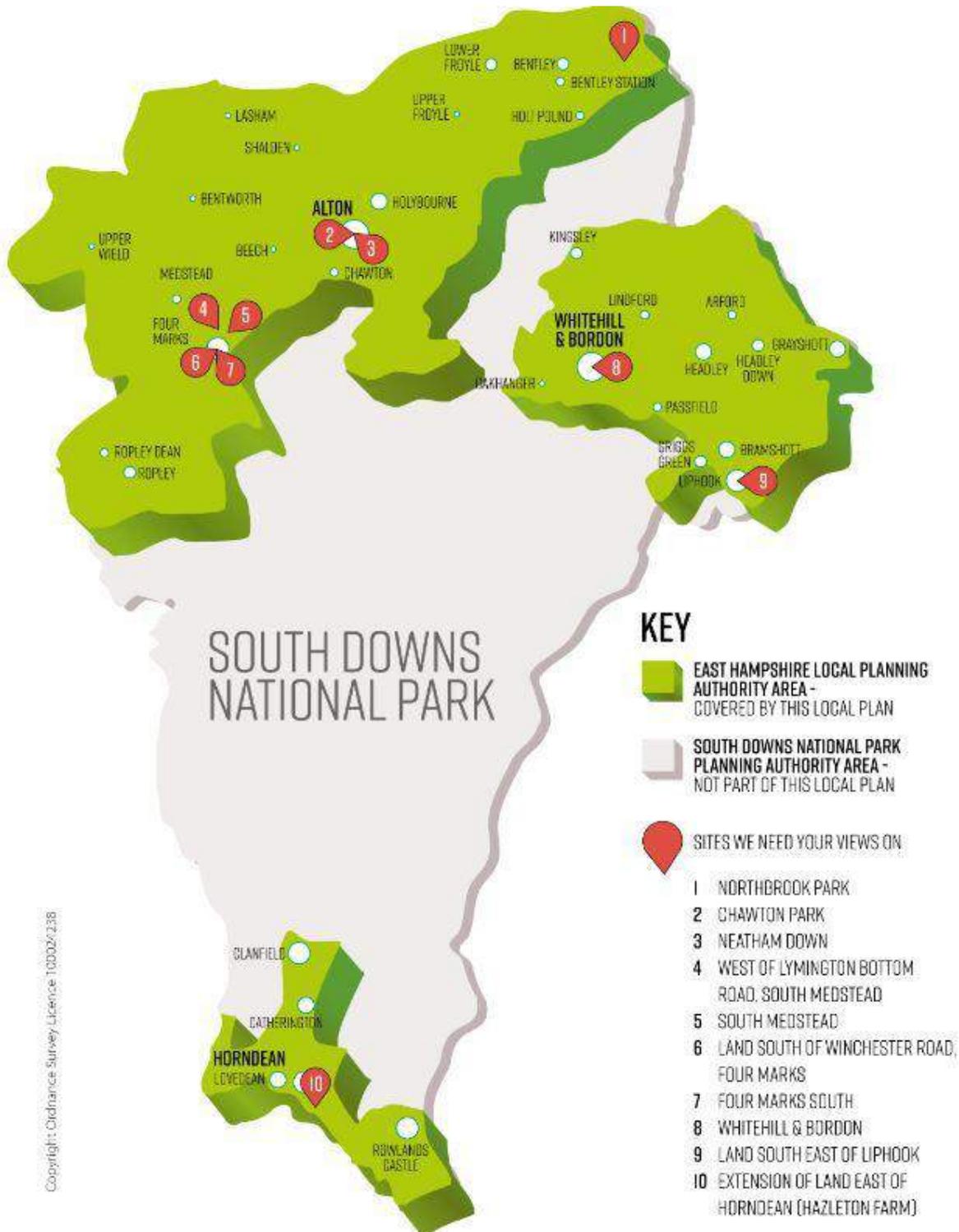
Climate Change References

UK Government and parliamentary action:

1. The law for net zero carbon emissions by 2050 in the UK has been passed at the House of Commons.
2. The UK is amending the 2050 greenhouse gas emissions reduction target in the Climate Change Act from at least 80% to 100%.
3. 25 Year Environment Plan launched in January 2018: A Green Future: Our 25 Year Plan to Improve the Environment.
4. Road to Zero Strategy: Next steps towards cleaner road transport and delivering our Industrial Strategy. New cars to be ultra-low emission by 2030 Published 9 July 2018.
5. Clean Air Strategy 2019 Published 14 January 2019.
6. UK Government plans to end the sale of all new conventional petrol and diesel cars and vans by 2040 There will also be a new Clean Air Fund established. (Published 26 July 2017).
7. UK Government plans for tackling Roadside Nitrogen Dioxide Concentrations (Published 26 July 2017).
8. The Chancellor's announcement in the Spring Statement on Wednesday 13 March 2019: Gas boilers will be banned in new homes from 2025 to tackle climate change. Measure will be included in a Future Homes Standard Policy.
9. Advice from the UK government's Committee on Climate Change.
10. The UK Government's commitment to: The Carbon Plan: Delivering our low carbon future (Published December 2011).

Appendix B

Location of the major sites (extract from EHDC consultation document)



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11/14/2019

Mail - Woodgate, Jenny - Outlook

England and having its registered office at Southern House, Yeoman Road, Worthing, BN13 3NX, England. In sending this e-mail the sender cannot be deemed to have specified authority and the contents of the e-mail will have no contractual effect unless (in either case) it is otherwise agreed between Southern Water Services Limited and the recipient.

This message has been scanned for malware by Websense. www.websense.com

Large Development Sites

(REGULATION 18)

CONSULTATION QUESTIONNAIRE

3 September – 15 October 2019



East Hampshire Local Plan Large Development Sites

This questionnaire has been prepared to assist you in responding to the consultation and should be used alongside the Large Development Sites consultation document and the Why, when and how to get involved guide.

Please note that the Council is unable to accept anonymous comments and for a comment to be formally accepted, a name and contact address (preferably e-mail) must be provided. Comments to this consultation are part of the evidence base which supports the emerging Local Plan. As such, all comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website. Your comments will be made publicly viewable at the appropriate time.

If you wish to be kept updated about this consultation and other Local Plan matters, please register for email alerts via our website.

Name

Organisation (if applicable)

Email (preferred method of contact)

Address Line 1

Post Town

Post Code



To be completed by agents acting on behalf of a client

Client Name

Client Organisation

Client Email

Client Address Line 1

Client Post Town

Client Post Code



How to respond using this form

Please refer to the ***Why, when and how to get involved*** guide available on our [website](#).

When responding, please include the name of the site your comments refer to. If commenting on more than one site, please make it clear which comment relates to which site.

There are a series of consultation questions. These are:

- 1: Do you have any comments on the proposed uses?
- 2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.
- 3: Do you know of any other constraints to developing the site? Please provide detail and evidence.
- 4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.
- 5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036.

- 6: Is there any reason that this is not achievable?
- 7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?
- 8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper? <link>
- 9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?
- 10: Is there any feedback you would like to give us about this consultation?



Large Development Sites

When responding to a consultation question please quote the question number from the list provided and where applicable, the site name.

Please provide your comments in the box below. Use additional sheets as required.

Click here to enter text electronically Extension to Land East of Horndean

Q2. What infrastructure is required to support the proposal and when?

Southern Water is the statutory wastewater undertaker for Horndean - we do not provide wastewater services to any other large sites set out in this consultation. Therefore our comments relate to this site only.

Notwithstanding current proposals for development of land immediately to the north of this site, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.

Proposals for 1000 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2018).

Should this site be taken forward to the next stage for allocation, Southern Water would seek the inclusion of the following into the site allocation policy;

Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.



Click here to enter text electronically

SUBMISSION

Please submit your comments to reach us by midnight on 15 October 2019 either by:

- E-mail to localplan@easthants.gov.uk
- By post to Planning Policy, East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX

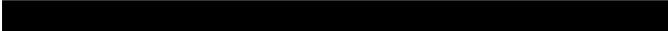
Thank you for taking the time to have your say.



Representation received. ID:27612

East Hampshire District Council <easthants@jdi-consult.net>

Mon 14/10/2019 15:27

To: 

Sport England,

Your representation has been received.

ID: 27612

Type: Comment

Document: Large Development Sites

Section: WB2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

Full Text:

Sport England has been involved in securing appropriate replacement sports facilities and playing field under the hybrid planning permission for the redevelopment of Prince Phillip Park. We would expect that further growth of the area for nearly 1300 new homes to generate further demand for sports and recreation provision. It is not clear how that demand will be met. Sport England notes that the council has an up to date and robust assessment of its indoor and outdoor sports facility needs. Consideration should be given to the findings of these strategic documents to inform the infrastructure needs.

Representation received. ID:27627

East Hampshire District Council <easthants@jdi-consult.net>

Mon 14/10/2019 15:47

To: 

Sport England,

Your representation has been received.

ID: 27627

Type: Comment

Document: Large Development Sites

Section: LP2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

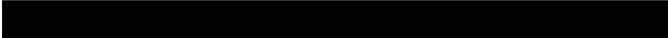
Full Text:

Sport England would typically expect a development of this size to generate additional demand for sport and recreation facilities which can be met off-site without the requirement for on-site provision. Sport England notes that the proposed site allocation could accommodate the relocation of Liphook United FC. Any potential relocation would be required to meet with Sport England's E4 exception under its playing fields policy, which requires that any replacement provision is at least equivalent or better in terms of quantity; quality and accessibility to that which has been lost. Sport England would recommend early engagement on any potential relocation.

Representation received. ID:27635

East Hampshire District Council <easthants@jdi-consult.net>

Mon 14/10/2019 16:08

To: 

Sport England,

Your representation has been received.

ID: 27635

Type: Comment

Document: Large Development Sites

Section: HD2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

Full Text:

Sport England is not clear whether the site allocation encompasses the land where outline permission is sought under app ref: 55562/005 for upto 800 dwellings and app ref: 55562/006 for up to 85 age restricted dwellings. This outlines plans for a new cricket ground and associated ancillary facilities. However, there is no mention of this provision within the section on suggested infrastructure provision.

Representation received. ID:27638

East Hampshire District Council <easthants@jdi-consult.net>

Mon 14/10/2019 16:18

To: 

Sport England,

Your representation has been received.

ID: 27638

Type: Comment

Document: Large Development Sites

Section: NBP2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

Full Text:

Sport England considers that for a development of this size, we would normally expect contributions to off-site sports and recreation provision rather than on-site provision which may be difficult to sustain given the size of the population. While we note that sports pitches have been identified, it may be better to direct investment into off-site facilities, new or existing. Again, the council's Playing Pitch Strategy and/or indoor sports facilities strategy should be used to inform such decisions about such provision.

Representation received. ID:27646

East Hampshire District Council <easthants@jdi-consult.net>

Mon 14/10/2019 16:48

To: 

Sport England,

Your representation has been received.

ID: 27646

Type: Comment

Document: Large Development Sites

Section: CP2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

Full Text:

Sport England would urge consideration of the Council's Playing Pitch Strategy and indoor sports facilities strategy to inform the sport and recreation provision for the site allocation. Sport England notes that the site allocation is adjacent to an existing cricket ground. Consideration will need to be given to the potential ball-strike issues which might arise from introducing any new development into the area on land adjacent to the cricket ground. Sport England notes that this is an increasing problem where the location of new housing or employment land can prejudice existing cricket facilities.

Representation received. ID:27649

East Hampshire District Council <easthants@jdi-consult.net>

Mon 14/10/2019 16:53

To:



Sport England,

Your representation has been received.

ID: 27649

Type: Comment

Document: Large Development Sites

Section: CP3: Do you know of any other constraints to developing the site? Please provide detail and evidence.

Summary:

Full Text:

Please see comment about potential ball-strike risk from the cricket ground, the needs to assess and mitigate that risk if necessary to protect the existing cricket ground so as not to prejudice its use for sport

Representation received. ID:27663

East Hampshire District Council <easthants@jdi-consult.net>

Mon 14/10/2019 16:54

To:



Sport England,

Your representation has been received.

ID: 27663

Type: Comment

Document: Large Development Sites

Section: ND2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

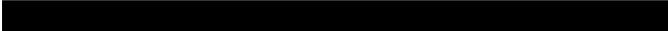
Full Text:

Sport England has no specific comments but would expect that any needs for sport and recreation provision be met off-site given size of proposed development.

Representation received. ID:27670

East Hampshire District Council <easthants@jdi-consult.net>

Mon 14/10/2019 16:56

To: 

Sport England,

Your representation has been received.

ID: 27670

Type: Comment

Document: Large Development Sites

Section: FMS2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

Full Text:

Sport England would expect that consideration is given to off-site sport and recreation provision to meet the needs of this development. We would expect that regard is had to the council's Playing Pitch Strategy and Indoor sports facilities strategy.

Representation received. ID:27943

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 10:02

To: 

Sport England,

Your representation has been received.

ID: 27943

Type: Comment

Document: Large Development Sites

Section: SWR2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

Full Text:

Sport England would not consider that the site allocation would require on-site sports and recreation provision given the number of dwellings proposed. However, consideration will need to be given off-site contributions to improving existing facilities or creating new facilities to meet the demand from the new population. Again this should be informed by the Playing Pitch Strategy and indoor sports facilities strategy.

Representation received. ID:27947

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 10:07

To: 

Sport England,

Your representation has been received.

ID: 27947

Type: Comment

Document: Large Development Sites

Section: SM2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

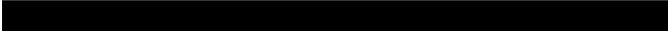
Full Text:

Again, Sport England would expect a development of this size to make contributions to off-site sports and recreation provision, either improvements to existing facilities or creation of new facilities. This should be informed by the needs identified in the Playing Pitch Strategy and/or indoor sports facilities strategy.

Representation received. ID:27949

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 10:16

To: 

Sport England,

Your representation has been received.

ID: 27949

Type: Comment

Document: Large Development Sites

Section: WLB2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.

Summary:

Full Text:

Sport England notes that sports provision is identified for this site allocation. Any sports provision should be designed and constructed in accordance with Sport England design guidance. Again, any proposed sports provision should be informed by the findings of the Playing Pitch Strategy and/or indoor sports facilities strategy.

East Hampshire Draft Local Plan 2017-2036 Large Development Sites Consultation

[Redacted]@surreycc.gov.uk>

on behalf of

Planning Consultations/EAI/SCC <planning.consultations@surreycc.gov.uk>

Mon 14/10/2019 16:16

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (244 KB)

RESPONSE [Redacted] East Hants large devt sites oct 2019.pdf;

Dear Sir or Madam

Please find Surrey County Council's response to the above consultation attached to this email. Thank you for consulting us.

Kind regards

[Redacted]
Spatial Planning Team
County Hall
Kingston upon Thames
KT1 2DY
Telephone [Redacted]

* * * * *

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* * * * *

Tel: [REDACTED]

Email: Planning.consultations@surreycc.gov.uk



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

***Highways Transport and
Environment Directorate***

**Spatial Planning Team
Surrey County Council
County Hall
Kingston upon Thames
KT1 2DN**

Sent by email to: localplan@easthants.gov.uk

15 October 2019

Dear Sir/Madam

East Hampshire Draft Local Plan 2017-2036 Large Development Sites Consultation

Thank you for consulting Surrey County Council on the East Hampshire Draft Local Plan 2017-2036 (Regulation 18).

Our comments in response to this consultation are set out under the relevant headings below and should be read alongside our letter to you dated 19 March 2019, sent in response to the earlier consultation on the East Hampshire Draft Local Plan 2017-2036, attached as an annex to this letter.

Highways and Transport Issues

In relation to highways and transport issues, each of the currently proposed large sites are, to a greater or lesser extent, likely to impact on the A31 in Surrey. The proposed allocations at Northbrook Park and at Whitehill and Borden are closest to the Surrey boundary, and therefore we remain concerned about the potential for the development of these sites to impact on traffic flows on the A325 and A31.

In our previous response, we expressed our view that these potential impacts should be assessed prior to being taken forward in the next iteration of the Local Plan. It is understood that some baseline modelling work has been undertaken to assess the impacts of the proposed sites on roads within the borough and that it is intended to extend this work to assess the cross boundary impacts to inform the next Regulation 19 Local Plan consultation. We anticipate that further extension of this work will identify appropriate measures to resolve any cross boundary impacts. We hope that particular consideration will be given to jointly promoting any appropriate schemes that have been included with the Waverley Local Plan, including those relating to bus service provision.

It will be important to engage with other authorities with an interest in the provision of transport infrastructure to meet the needs of the proposed new development, including Highways England, Hampshire County Council and Waverley Borough Council and it would be useful if the District Council could coordinate joint discussions at an appropriate stage in the process of progressing the plan.

We would reiterate our expectation, expressed in our previous letter, that in the event of either the site at Northbrook or Whitehill and Borden being allocated, consideration will be given to promoting the Wrecclesham by-pass scheme as a potential mitigation measure along with the Hickleys Corner underpass scheme.

It is considered that any transport schemes necessary to ensure that the impacts of proposed new development are acceptable should be included in the infrastructure schedule of the Infrastructure Delivery Plan. These requirements should also be set out within the site related policies of the Local Plan to ensure that appropriate developer contributions are secured towards funding these schemes.

Education Issues

We are aware that the proposed development may also impact on secondary schools in the Farnham and Haslemere areas. We would therefore welcome further discussion with your officers, along with Hampshire County Council as the Local Education Authority, to clarify how additional need in these areas is intended to be met.

Minerals and Waste Issues

We previously made comments relating to the Alton Road Sandpit. This site is now operational under the permission for the extraction of sand (770,000 tonnes) and clay (512,000 cubic metres) from a site of 36.2 ha; filling of existing and resultant void with (2.6 million cubic metres) non-hazardous industrial, commercial, household and inert waste; installation of plant and equipment; alterations to existing site access onto A31; and comprehensive restoration of the site over a period of 11.5 years without compliance with Condition 1 of planning permission ref. WA99/0223 to allow the development to be completed in all respects no later than 31 December 2029.

As the neighbouring MPA, we would be concerned by any new residential development within close proximity to the Alton Road Sandpit site that could comprise a threat to the operation of this existing site, which is vital to the supply of soft sand in Surrey and the wider south east region. It would typically be considered, in accordance of paragraph 182 of the NPPF, that the plan making authority, as 'the agent of change' in promoting this development, must ensure that suitable mitigation can feasibly be delivered to safeguard the future operation of the quarry.

If you have any queries, please do not hesitate to contact [REDACTED] on [REDACTED] 3, or by email at [REDACTED]@surreycc.gov.uk.

Yours sincerely

[REDACTED]

Spatial Planning Team

Tel: [REDACTED]
Email: Planning.consultations@surreycc.gov.uk



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

***Highways Transport and
Environment Directorate***

**Spatial Planning Team
Surrey County Council
County Hall
Kingston upon Thames
KT1 2DN**

Sent by email to: localplan@easthants.gov.uk

19 March 2019

Dear Sir/Madam

East Hampshire Draft Local Plan 2017-2036 Consultation

Thank you for consulting Surrey County Council on the East Hampshire Draft Local Plan 2017-2036 (Regulation 18). We have comments to make as the highways and transport and as the minerals and waste planning authorities for Surrey. Our comments are set out under the relevant headings below.

Surrey highways and transport authority comments

Our highways and transport concerns mainly relate to the proposed allocation of Site SA21 Northbrook Park for a new settlement comprising a minimum of 800 dwellings. We also have concerns about the additional 1,534-1794 dwellings proposed for allocation in Whitehill Bordon.

We welcome the statement in the IDP that the council will work with us, as a neighbouring authority, to determine the transport infrastructure improvements required to support the delivery of the allocated sites proposed in the Draft Local Plan, and we note the specific reference to these two sites. Both have the potential to generate significant increases in traffic on the already overstretched network of the A325, through Wrecclesham, and on the A31 Farnham Bypass. We consider that the transport impacts of these proposed allocations should be assessed prior to their being finalised in the next iteration of the Local Plan. They will of course be subject to a full Transport Assessment at the planning application stage. It is expected that the measures necessary to mitigate the impacts of additional traffic on the A325/A31 around Farnham will be appropriately funded by developer contributions.

We fully support the aspiration in the Local Plan for new homes to be “directed to the most sustainable and accessible locations in the area”, however, it is our view that seeking to meet a significant proportion of the District’s housing needs at Northbrook Park will not achieve this objective.

In terms of sustainable transport considerations, the Northbrook Park site is equidistant between Bentley and Farnham stations and it is questionable as to whether any form of bus connection to these stations could be economically viable. Bentley offers services northbound and the only destination possible southwards is Alton. In addition, the access to Bentley station is via single track lanes. To reach places such as Basingstoke and Winchester by rail from Bentley, would mean driving to Farnham, where there is limited opportunity for parking, or further afield.

The Local Plan intention to concentrate additional growth in “locations that can provide supporting infrastructure and facilities provides better opportunities for reducing the reliance on the private car” is fully supported. However, it is considered that securing a sustainable transport solution for a development site in this location will be challenging, particularly for a settlement of this relatively modest size. The achievement of a modal shift away from the private car is considered likely to require dedicated cycle routes to Farnham, Wrecclesham and Bentley alongside bus services provided in perpetuity.

It is noted that the proposed allocation for 800 homes to be provided on the Northbrook Park site is a minimum figure. A larger site could potentially achieve greater connectivity with Farnham and would help to make public transport solutions more viable, such as the provision of a bus service in perpetuity. It could also help to increase the site’s self-reliance in supporting a greater range of facilities such as shops and schools to be provided on-site. This would reduce the need for travel between the site and surrounding towns. However, the creation of an entirely self-reliant site would require expansion of the existing proposals on a massive scale and a substantial investment in transport infrastructure to eliminate any significant impact on Surrey’s surrounding roads.

Significant increases in traffic and congestion in Wrecclesham would be likely to result from the development proposed in the draft Local Plan at Northbrook. Therefore, should the Local Planning Authority decide to pursue the proposals for a strategic allocation for 800 homes or more, the provision of a relief road will be needed to mitigate the impacts on the community in Wrecclesham. It is envisaged that the route for the relief road would link into the A31 at the point of the Northbrook new community. Similarly, the proposed extension to the Whitehill – Bordon settlement is additionally likely to add to congestion in this area. Developer funding from both the Northbrook site as well as from any further expansion of Whitehill Bordon would therefore be expected to make a substantial contribution to the Wrecclesham relief road scheme and also towards improvements on other sections of road including the junction at Hickley’s Corner in Farnham.

Surrey minerals and waste planning authority comments

The proposed site allocation at Northbrook Park borders both Alton Road Sandpit and the Minerals Safeguarding Area (MSA) for soft sand that surrounds Alton Road Sandpit, to the east and south east. Both the boundary of Alton Road Sandpit and the soft sand MSA can be viewed on our Minerals and Waste Safeguarding Online Map Viewer tool, accessible from our website.

Whilst we do not wish to raise an objection to the allocation of this site for future development, we would seek to raise your awareness regarding the activities within close proximity to the site. Alton Road Sandpit has permission for the extraction of sand (770,000 tonnes) and clay (512,000 cubic metres) from a site of 36.2 ha; filling of existing and resultant void with (2.6 million cubic metres) non-hazardous industrial, commercial, household and inert waste; installation of plant and equipment; alterations to existing site access onto A31; and comprehensive restoration of the site over a period of 11.5 years without compliance with Condition 1 of planning permission ref. WA99/0223 to allow the

development be completed in all respects not later than 31 December 2029. As of 1st of March 2019, working of the mineral has not yet commenced at Alton Road Sandpit.

If you have any queries, please do not hesitate to contact [REDACTED] on [REDACTED], or by email at [REDACTED]@surreycc.gov.uk.

Yours sincerely

[REDACTED]

Spatial Planning Team

East Hampshire Local Plan (Large Development Sites Consultation) - RESPONSE ON BEHALF OF THAMES WATER UTILITIES LTD.

[Redacted]

on behalf of

Thames Water Planning Policy <ThamesWaterPlanningPolicy@savills.com>

Fri 04/10/2019 16:06

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: [Redacted]

📎 2 attachments (705 KB)

19.10.04 - East Hants Large Dev sites.pdf; 19.10.04 East Hants Large Dev sites table.pdf;

Dear Sir/ Madam

Please find our response to the above attached on behalf of Thames Water.

Regards,

[Redacted]

[Redacted]

Planning Administrator

Planning

Savills, Ground Floor, Hawker House , 5-6 Napier Court , Napier Road , Reading RG1 8BW

 Tel :+44 (0) 1189 520 509
Email [Redacted]
Website :www.savills.co.uk



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David Wilson



thameswaterplanningpolicy@savills.com



0118 9520 500

4th October 2019

East Hampshire Local Plan – Large Development Site Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory sewerage undertaker for the majority of the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

General Comments on Wastewater and Sewerage Infrastructure

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater [and water supply] treatment infrastructure.

Wastewater/sewerage [and water supply] infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

Paragraph 28 relates to non-strategic policies and states: “*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...*”

Paragraph 26 of the revised NPPF goes on to state: “*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively*

prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “*Adequate water and wastewater infrastructure is needed to support sustainable development*” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at:

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that the Local Plan should include a specific policy on the key issue of the provision of sewerage/wastewater [and water supply] infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy/supporting text:

PROPOSED NEW WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Local Plans should also consider the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in the AMP6 period which runs from 1st April 2015 to 31st March 2020 and does not therefore cover the whole Local Plan period. AMP7 will cover the period from 1st April 2020 to 31st March 2025. The Price Review, whereby the water companies' AMP7 Business Plan will be agreed with Ofwat during 2019.

We therefore request that the Local Plan also include the following additional section:

“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”

Comments on Proposed Development Sites

The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure.

The attached table provides Thames Water's site specific comments from desktop assessments on sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

7 of the 10 sites are located within the Thames Water waste operational area (as per the attached table).

Depending on the location of other smaller site allocations that the council plans to deliver we will need to review the infrastructure requirements as a whole. Because of the uncertainty as to which of these site will come forward we cannot be any more specific at this stage.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

Developers should engage as early as possible so the infrastructure needs can be discussed and solutions drawn up. Developers can contact Thames water - <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully

Thames Water Utilities Ltd

All Sites for Development Plan East Hampshire - East Hampshire Local Plan (Large Development Sites Consultation)									
Created Date	Site ID	Site Name	Service Type	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Sewage Works flows are likely to drain to	Net Property Equivalent Increase - Waste	Waste Response	Additional Comments
06/09/2019	62980	Chawton Park	Waste only	1283040	14.85	Alton	1200	The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered	This site is likely to drain to Alton STW. On its own the works should be able to accommodate this development. Further reviews would need to be undertaken if other large scale development was to also come forward

06/09/2019	62981	Four Marks South	Waste only	855360	9.9	Alton	800	<p>The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>	<p>This site is likely to drain to Alton STW. On its own the works should be able to accommodate this development. Further reviews would need to be undertaken if other large scale development was to also come forward</p>
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06/09/2019	62979	Land south east of Liphook	Waste only	641520	7.43	Borden	600	<p>This site is likely to drain to Bordon STW. Current infrastructure at the wastewater treatment works in this area may be unable to support the demand anticipated from this and other development. Minor infrastructure upgrades maybe required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought</p>	None
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									forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered	
06/09/2019	62984	Land south of Winchester Road Four Marks	Waste only	748440	8.66	Alton	700	The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning	This site is likely to drain to Alton STW. On its own the works should be able to accommodate this development. Further reviews would need to be undertaken if other large scale development was to also come forward	

								application, informing what infrastructure is required, where, when and how it will be delivered	
06/09/2019	62985	South Medstead	Waste only	641520	7.43	Alton	600	The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered	This site is likely to drain to Alton STW. On its own the works should be able to accommodate this development. Further reviews would need to be undertaken if other large scale development was to also come forward

06/09/2019	62986	West of Lymington Bottom Road South Medstead	Waste only	694980	8.04	Alton	650	<p>The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>	<p>This site is likely to drain to Alton STW. On its own the works should be able to accommodate this development. Further reviews would need to be undertaken if other large scale development was to also come forward</p>
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06/09/2019	54627	Whitehill & Bordon, Hampshire (Reviewed Jan18)	Waste only	1372852.8	15.89	Borden	1284	<p>This site is likely to drain to Bordon STW. Current infrastructure at the wastewater treatment works in this area may be unable to support the demand anticipated from this and other development. Minor infrastructure upgrades maybe required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought</p>	None
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								<p>forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>	
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Draft East Hampshire Local Plan - Consultation on Large Development Sites

[REDACTED]@waverley.gov.uk>

Tue 15/10/2019 17:46

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 2 attachments (1 MB)

Response to large development sites consultation - final.docx; Waverley Response to Reg 18 Draft East Hampshire LP.docx;

Dear Sir/Madam

Please find attached the response to this consultation on behalf of Waverley Borough Council.

Yours faithfully

[REDACTED]
Planning Policy Manager
Waverley Borough Council
Tel: 01483 523472
www.waverley.gov.uk

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Sent by email
localplan@easthants.gov.uk

██████████
Planning Policy Manager
E-mail: ██████████
Direct line: 01483 523472
Date: 15th October 2019

Dear Sir/Madam

The Draft East Hampshire Local Plan – Consultation on Large Development Sites

I am writing on behalf of Waverley Borough Council in response to the consultation on large development sites.

In responding to this consultation, the Council's focus has been on considering the potential cross boundary impacts on Waverley, arising from the development of any of these large sites. It is acknowledged that not all of these sites will be allocated in the emerging Local Plan. Our understanding is that up to only two sites are likely to be chosen and that you are presenting for consultation a range of alternatives.

You will recall that in March this year, the Council responded to the earlier Regulation 18 consultation on the Draft Local Plan. That included commenting on two of the sites included in the latest consultation (Whitehill/Bordon and Northbrook Park). A copy of that response is attached for reference.

The Council's comments on specific sites in the current consultation are as follows:

Whitehill and Bordon

The consultation material suggests a development of around 1284 new homes and 3.1 ha of employment land. In its response to the earlier consultation, the Council identified the potential transport impact on the A325/A31 corridor. It is noted that in the list of infrastructure provision being suggested by the promoter of the site, there is no reference to wider transport infrastructure. However, the Council remains very concerned about the potential cross boundary impacts on the A325/A31, not just from traffic travelling to the Farnham area, but also traffic using this important transport corridor to access Guildford, the Blackwater Valley and the M3/M25 beyond. The main road network around Farnham is already congested and therefore, it is essential that these cross boundary impacts are carefully assessed and mitigation identified if this development is to go ahead.

Northbrook Park

The consultation material suggests a development of 800 new homes and 2.6 ha of employment land. In its previous response the Council identified the fact that there is already congestion on the road network in/around Farnham and that a significant development on the Waverley boundary has the potential to exacerbate this congestion. It is noted that in the list of infrastructure provision being suggested by the site promoter, there is a general reference to cross boundary infrastructure, such as a reference to improvements to specific road junctions in Farnham and elsewhere.

The Council previously commented on the available evidence on transport impacts from this development and remains very concerned that there potentially will be a harmful impact on Waverley Borough from the traffic generated by the development of this site.

It is noted that the proposed development is expected to provide a primary school, village hall, a pub, three shops a village hub and open space to support what would be a new settlement. At this stage the site is promoted for 800 homes. If the site is allocated in the Plan it will be important to be sure that a settlement of this size can sustain these facilities in both the short and longer term. Notwithstanding this, residents will have to leave the site to access other facilities such as employment, education, shopping and leisure. As identified above, there is already congestion on the road network around Farnham and it is essential, therefore, that the potential cross boundary impact in terms transport/traffic are fully assessed and appropriate mitigation included. This includes considering the impacts on the road network, as well as impacts on public transport infrastructure, such as at Farnham Station. The potential impacts on other facilities, such as secondary education and leisure, must also be addressed, given that Farnham is the closest large settlement to this site.

It is noted that SANG has been identified, but that some of this proposed SANG lies within Waverley Borough. Clearly if this development were to proceed with a SANG partly within Waverley it would be necessary to seek the relevant planning approval from the Council.

Land South East of Liphook

The consultation material suggests a development of around 600 homes and 2 ha of employment land. Although no cross-boundary impacts are identified in the consultation material, the proposed site is relatively close to Haslemere and the Council is concerned, therefore, about potential cross boundary impacts, particularly on the local road network in Haslemere and on public transport infrastructure. In relation to this latter point, the Council is concerned about the potential additional pressure, particularly from parking, resulting in commuters using the services from Haslemere or Farnham. This point was raised in the earlier consultation in relation to the potential cumulative impact from the housing allocations then envisaged in Liphook and Headley.

Other sites

It is noted that there are a further six sites being considered further along the A31 corridor, in the vicinity of Alton and Four Marks. It is appreciated that not all of these sites would be allocated and that they are further away from Waverley than the sites considered above. However, if any of these sites are included, then it is still important that any transport impacts on the A31, including any cross boundary impacts, are identified and addressed.

Summary

Under the Duty to Co-operate the Council is happy to continue discussions on these potential cross boundary effects and how they can be addressed, before the Local Plan proceeds to the formal Regulation 19 stage.

Yours faithfully



Planning Policy Manager

Sent By Email:

localplan@easthants.gov.uk

██████████
Planning Policy Manager

E-mail: ██████████

Direct line: 01483 523472

Date: Tuesday 19th March 2019

Dear Sir/Madam

The Draft East Hampshire Local Plan – Regulation 18 Consultation

Thank you for giving Waverley the opportunity to comment on your draft Local Plan. Waverley considers that for a sound East Hampshire Local Plan there needs to be further cooperation between Waverley and East Hampshire District Council as well as Hampshire and Surrey County Councils to ensure that appropriate measures are taken to mitigate any detrimental impacts on Waverley from the development proposed in the Plan.

The Housing Requirement

We note that East Hampshire's assessment of housing need is based on the 2014 household projections in accordance with the new NPPF. It is recognised that East Hampshire is seeking to provide more homes than assessed as needed in the district by a nearly 1,000 homes. This will give the plan the flexibility to meet the housing requirement if some of the allocations, windfalls or housing proposed in the South Downs National Park for the part of the district that lies within it does not come forward.

Development Allocations

The southern area is detached from Waverley by the South Downs National Park. The housing allocations in this area therefore should not have significant implications for Waverley.

The allocations in Liphook and Headley are relatively small. However, Waverley considers that the cumulative effects of additional housing from these sites could be significant because residents of them are very likely to drive to Haslemere or Farnham Stations to commute by rail to work. Both these railway stations are already struggling to meet the demand for car parking despite the recent improvements to their parking capacity. This will result in an increased demand for on-street parking around the stations that will exacerbate the parking problems already experienced by local residents.

Whitehill & Bordon

Waverley raised concerns regarding the amount of development proposed for the Whitehill Bordon SDA when the now adopted Joint East Hampshire and South Downs Core Strategy was prepared because of the

potential impact on the A325/A31 corridor at Wrecclesham and Farnham. Some limited financial contributions were subsequently secured through the planning permission for the development. However, the East Hampshire draft Local Plan now proposes to allocate homes for the SDA in addition to the number of homes already allocated in the adopted Joint East Hampshire and South Downs Core Strategy. Transport schemes such as the Wrecclesham relief road may be required to mitigate the impact of increased traffic that will result from the additional homes for the SDA proposed here in the draft Local Plan. Waverley will therefore be seeking to secure further financial contributions when the developments are implemented through the s106 agreements that will be linked to the planning permission for the new homes.

Northbrook Park

Transport

The evidence base for the adopted Waverley Local Plan that was examined in 2017 demonstrated that there is a net out-commute from East Hampshire into Waverley and other adjacent Surrey and London Boroughs. There is already congestion on the road network in/around Farnham and a significant development on the Waverley boundary has the potential to exacerbate this congestion.

Waverley recognises that the evidence base for the draft East Hampshire Local Plan includes two documents that relate to highways and transport issues:

1. East Hampshire Site Assessment;
2. East Hampshire Local Plan Interim Transport Assessment;

However, the site assessment goes no further than the potential site access layout and only seeks to demonstrate that appropriate access can be achieved. The East Hampshire Interim Transport Assessment uses Hampshire County Council's North Hampshire Transport Model (NHTM) and Solent Transport's SRTM (Sub-Regional Transport Model). However, at this stage the assessment only undertakes a Stage 1 Baseline Assessment that represents a scenario and no allowance is made for the new Local Plan allocations. Therefore, Northbrook Park is not included in the Stage 1 Baseline assessment. In addition, the Assessment does not extend outside of Hampshire boundaries and no assessment has been made of the potential impacts even with Stage 1 on adjacent administrations, including Waverley.

Therefore, there are concerns that there potentially will be a harmful impact from development traffic from the draft site allocation within the draft Local Plan.

It is appreciated that the draft Local Plan refers to further work on Northbrook Park being needed and recognises the need for East Hampshire to work with Waverley and Surrey Council as the site lies adjacent to the mutual county and borough boundary. Waverley would suggest that officers from Waverley, East Hampshire, Surrey County Council and Hampshire County Council meet to agree the scope of further assessment work that may be required to determine the impacts from all development proposed in the draft Local Plan within Waverley and within Surrey in general. Waverley requests that transport-modelling work for the Regulation 19 consultation must include an assessment of impacts within Waverley Borough that takes into account the Waverley Local Plan alongside other Local Plans such as Guildford and Rushmoor.

Flooding

The Level 1 Strategic Flood Risk Assessment (SFRA) and the SFRA Interim Supplement incorporating the Sequential Test assesses part of the site as being within Flood Zones 2 and 3. These studies conclude that there is a need for an Exception Test that must be satisfied and a Level 2 site specific SFRA should be carried out. However, it is not clear from the evidence if the choice of Northbrook Park for development satisfies the sequential test to steer new development to areas with the lowest risk of flooding in accordance with the NPPF. Waverley therefore requests that clarification on how the sequential test has been addressed and how the application of the exception test will be applied in the future Area Action Plan or planning application.

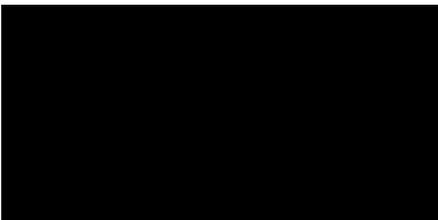
The Level 1 SFRA also recognises that Waverley has identified the risk of new development in East Hampshire increasing flood risk downstream. However, although the Level 1 SFRA sets out measures to ensure that flooding downstream does not occur, it does not specifically set out the measures that the development at Northbrook Park would need to carry out to mitigate any impact on Farnham. The amount of development could result in faster water flow and without the absorption of natural flood plains may result in flooding in Farnham further downstream. It is therefore very important that Waverley is kept informed of any work of the measures to mitigate the impact of any flooding as consideration of the site progresses.

Summary

The published Duty to Cooperate background paper to the draft Local Plan acknowledges that further collaboration with Waverley Borough Council and Surrey County Council is required to consider cross boundary infrastructure requirements and provision. We are therefore pleased that East Hampshire has invited Waverley officers to meet regarding the draft Local Plan as part of the Duty to Cooperate. Waverley will take this opportunity to discuss with East Hampshire, along with Hampshire and Surrey County Councils, how any proposed development in your plan can be delivered whilst ensuring that any harmful highways/transport and flood risk impacts are mitigated.

Currently Waverley and its partners are working together on a project master planning Farnham to enable improvements to the local infrastructure and the economy of the town and the surrounding area. This work includes a survey of users and service providers, considering the priorities for transport schemes and a transport study of the issues and opportunities in Farnham and the wider area. Any implications for transport in and around Farnham and on other infrastructure and services because of development planned within East Hampshire will therefore need to be considered in this work.

Yours sincerely




Planning Policy Manager



Comments on Large Development Site Consultation

[REDACTED]@westsussex.gov.uk>

Fri 11/10/2019 10:48

To: Stevens, Heather <Heather.Stevens@easthants.gov.uk>

Cc: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

📎 1 attachments (15 KB)

Officer Comments East Hampshire Local Plan Large Development Sites FINAL.docx;

Hello Heather

Thank you for the opportunity to comment on the Large Development Site Consultation. I've attached the comments from West Sussex County Council. If you would like to meet to discuss the comments, please let me know.

Kind regards,

[REDACTED]
Principal Planning Officer

Planning Policy and Infrastructure | Planning Services

West Sussex County Council, Ground Floor, Northleigh, County Hall, Chichester PO19 1RH

Phone: 0330 2229484

Email: [REDACTED]@westsussex.gov.uk | Web: www.westsussex.gov.uk

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East Hampshire Local Plan Large Development Sites

Regulation 18 Consultation

The response has been prepared by officers on behalf of West Sussex County Council, in respect to highways and education. East Hampshire District Council is requested to give due consideration to these issues in the preparation of the Large Development Sites document.

Highways

As we have previously outlined to you, officers have concerns that the junctions within WSCC, outside the EHDC boundary, have not been considered through the modelled. Therefore no assessment has been made as to the impact of planned and cumulative development, and if so, what mitigation would be required. This makes it difficult for West Sussex County Council to make specific comments on the proposed development in the Large Development Sites document at this time. However, it is acknowledged that modelling will take place in the Stage 2 2036 Do-Minimum Modelling which is being undertaken to enable cross boundary impacts to be better understood. We request that a copy of the specification and scope of this further work is shared with WSCC officers for comment, as part of duty to cooperate.

Education

The proposed site at Horndean has the potential to impact on West Sussex schools. However, it is noted that there is a requirement for a primary school which is welcomed. There are no further comments at this time.

Representation received. ID:28051

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 13:32

To:



Wheatsheaf Enclosure Residents Association,
Your representation has been received.

ID: 28051

Type: Comment

Document: Large Development Sites

Section: LP1: Do you have any comments on the proposed uses?

Summary:

Full Text:

Buses cannot get round the roads at the moment so how will the roads cope with the increase that 600 new homes will cause;

Representation received. ID:28133

East Hampshire District Council <easthants@jdi-consult.net>

Tue 15/10/2019 14:24

To: [REDACTED]

Wheatsheaf Enclosure Residents Association,
Your representation has been received.

ID: 28133

Type: Comment

Document: Large Development Sites

Section: LP6: Is there any reason that this is not achievable?

Summary:

Full Text:

As i have already pointed out, the whole local systems will go into overload to cope with this proposed increase of housing;

All these extra people will need to find jobs or use the station to travel to there new jobs,the surrounding roads are not up to the present volumes never mind adding 600 new homes with perhaps 2 or more cars!

Large Development Sites - Response to Questionnaire

[REDACTED]@whitehilltowncouncil.gov.uk>

Tue 15/10/2019 16:29

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

 1 attachments (243 KB)

Large Development Sites Consultation Questionnaire.doc;

Good afternoon, please find the Town Council response attached.

Kind regards

[REDACTED]

Deputy Town Clerk
Whitehill Town Council
Council Offices
Forest Community Centre
Pinehill Road
Bordon
Hampshire
GU35 0BS
Telephone 01420 473123
Fax 01420 479475
www.whitehilltowncouncil.gov.uk

Large Development Sites

(REGULATION 18)

CONSULTATION QUESTIONNAIRE

3 September – 15 October 2019



East Hampshire Local Plan Large Development Sites

This questionnaire has been prepared to assist you in responding to the consultation and should be used alongside the Large Development Sites consultation document and the Why, when and how to get involved guide.

Please note that the Council is unable to accept anonymous comments and for a comment to be formally accepted, a name and contact address (preferably e-mail) must be provided. Comments to this consultation are part of the evidence base which supports the emerging Local Plan. As such, all comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website. Your comments will be made publicly viewable at the appropriate time.

If you wish to be kept updated about this consultation and other Local Plan matters, please register for email alerts via our website.

Name

Whitehill Town Council

Organisation (if applicable)

Whitehill Town Council

Email (preferred method of contact)

[REDACTED]

Address Line 1

Forest Centre, Pinehill Road

Post Town

Bordon

Post Code

GU35 0BS



To be completed by agents acting on behalf of a client

Client Name

Client Organisation

Client Email

Client Address Line 1

Client Post Town

Client Post Code



How to respond using this form

Please refer to the ***Why, when and how to get involved*** guide available on our [website](#).

When responding, please include the name of the site your comments refer to. If commenting on more than one site, please make it clear which comment relates to which site.

There are a series of consultation questions. These are:

- 1: Do you have any comments on the proposed uses?
- 2: What infrastructure is required to support the proposal and when? This could be on or off-site provision.
- 3: Do you know of any other constraints to developing the site? Please provide detail and evidence.
- 4: What opportunities and/or benefits do you think the proposal could bring. Please explain how.
- 5: What are the cross-boundary considerations and the potential implications? How can they be overcome?

The site promoters consider their proposal to be deliverable within the Local Plan period up to 2036.

- 6: Is there any reason that this is not achievable?
- 7: Is there any other Large Development Site that could deliver over 600 homes and other supporting uses by 2036, that is not included in this consultation?
- 8: Do you have any comments on the assessment of Large Development Sites, as set out in the Council's background paper? <link>
- 9: Do you have any comments on the relationship between Large Development Sites and the draft Local Plan (2017-2036), particularly in relation to what other policies and proposals the draft Local Plan should contain?
- 10: Is there any feedback you would like to give us about this consultation?



Large Development Sites

When responding to a consultation question please quote the question number from the list provided and where applicable, the site name.



Click here to enter text electronically

Large Development Sites Consultation Questionnaire – draft responses : Whitehill and Bordon.

1. *We do not support building additional houses this site, based on the proposals in this consultation.*

This proposal distracts from the original agreement

The principles of a green healthy town should be adhered.

Any further development is not supported until the infrastructure is in place. The Town was previously asked for 3500 homes, these are in addition and an oversaturation of housing.

2. *Additional public transport is required, and a permanent bus link to the rail station.*

The timetabling of trains to buses should link.

There should be a free bus service around the Town. The Health Hub must be opened with expanded services, or the Chase hospital services expanded. Services retained at current level at least, or expanded in line with the population increase within the Town at present.

There should be particular regard for Nurses, Health and Social Services – and jobs across the region should show a broad range of skills, opening employment up to everyone.

The old A325 is declassified into the C114, and facing traffic calming measures, yet the Stage 2 test refers to the Town Centre being the Forest Shopping Centre area.

The present Mill Chase School site for proposed housing is not included on the map.

3. *We are in the midst of a climate crisis. Energy efficiency needs to be a priority for all houses, especially any under new build. The homes need to be affordable for local people to ensure they are not forced out of the area. Coupled to building homes due consideration needs to be given to jobs / employment opportunities in the Whitehill and Bordon area.*

More evidence is required for what has been delivered on self build.

Concerns that the new S.A.N.G. opposite Bordon Inclosure would provide access straight onto the Broxhead Common SSSI, which is also common land (for which WTC has the monitoring obligations).

Natural England feedback would be useful, to act as a safeguard balance between development and how this affects local wildlife.

All the traffic modelling for the Relief Road, Budds Lane, Camp Road; were not based upon the additional housing numbers – and definitely didn't assume that the new homes would use the Forest Centre as the town centre.

Traffic leaving Bordon from the north is already an issue in the morning. It would appear that Oakhanger will benefit from traffic calming measures if these sites go ahead; however this will further impact upon traffic leaving Bordon from the north.

4. *Scepticism on the opportunities that have not been delivered, in comparison to what has been promised. This includes 1 job for every house. If this DOES happen – it is positive but not conclusive. At this stage it is difficult to see any positives, every area within the town will become crammed and this will inevitably result in an irrevocable loss of green space and change the character of the Town.*



Please provide your comments in the box below. Use additional sheets as required.

Click here to enter text electronically

5. EHDC need to consider boundary changes if an integral part of the Town needs to be in the Town area, to deliver services. If additional houses are prevailing, then the precept revenue falls within the Whitehill Parish, so precept revenues come in to the Council centrally in order to provide services across the Town.

Town Council EHDC and WTC are key partners in the delivery.

If the Northbrook site is approved along with the additional houses to the north of Bordon, the impact on the A325 at the Coxbridge roundabout could be horrendous.

6. There is already "slippage" in the progress of delivery, so this affects progress levels and targets, and could easily occur again.

7. Not aware of anything within the Whitehill and Bordon parish.

8. Not applicable.

9. Infrastructure delivery commitments. Would like to see EHDC partnering with WTC upfront to discuss policy, rather than waiting until we become a Planning consultee, especially based upon our mandate from the 2nd May 2019 elections.

Can the water and sewage systems cope with all the new development? How will all the new development and ensuing traffic affect the air quality around the Town? Also, if we constantly build on every available area this will have a diminishing affect upon the wildlife through loss of habitat.

10. Hard copies of the consultation should be available, and put through resident's doors – as this consultation is only hitting the computer literate.

SUBMISSION

Please submit your comments to reach us by midnight on 15 October 2019 either by:

- E-mail to localplan@easthants.gov.uk
- By post to Planning Policy, East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX



Thank you for taking the time to have your say.



Winchester City Council Response to East Hampshire District Council Regulation 18 Consultation in respect of Large Development Sites.

JLee@WINCHESTER.GOV.UK

Fri 04/10/2019 13:24

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Winchester City Council Response to East Hampshire District Council Regulation 18 Consultation in respect of Large Development Sites.

Thank you for the opportunity to comment on your Large Development Sites Regulation 18 Consultation.

Winchester City Council does not have any particular comments to make in respect of the 10 sites being promoted, none of which are cross boundary or particularly close to our joint administrative boundaries and so are unlikely to have any direct impacts on Winchester's District.

It is expected that the potential for increased traffic on the A31 which connects both districts will be assessed by Hampshire County Council and so we have no particular comment in respect of this.

Large sites have been defined as being able to accommodate at least 600 new homes, WCC has experience of delivering large sites and in our experience a much greater quantum of houses will be needed to provide adequate / meaningful mitigation without adversely impacting on viability.

The site promoters are offering a wish list of added extras with the housing offer including primary schools, community facilities and open space. We consider that they are highly likely to be undeliverable given the scale of development proposed and potential viability issues.

Best wishes

Jill on behalf of planning policy at Winchester City Council.

Jill Lee BA (Hons), BTP, MRTPI.
Principal Planning Officer
Strategic Planning
Winchester City Council
Colebrook Street
Winchester
SO23 9LJ

Direct Dial [REDACTED]



Winchester
City Council

winchester.gov.uk

[www.visitwinchester.co.uk]visitwinchester.co.uk



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Woodland Trust comments on the Large Development Sites Consultation

campaigning@woodlandtrust.org.uk

Tue 15/10/2019 09:35

To: EHDC - Local Plan <LocalPlan@easthants.gov.uk>

Cc: campaigning@woodlandtrust.org.uk <campaigning@woodlandtrust.org.uk>

📎 1 attachments (453 KB)

Woodland Trust comments on the East Hants Local Plan Large Development S....pdf;

Dear Sir/Madam,

Thank you for the opportunity to comment on the above consultation. Please find attached the Woodland Trust's comments.

If you wish to discuss any of the points raised, please do not hesitate to get in touch.

Kind regards,

[REDACTED]

[REDACTED]

Campaigner - Woods Under Threat

Telephone: 03437705438

Email: [REDACTED]

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL

0330 333 3300

www.woodlandtrust.org.uk

Cases involving woods and trees under threat can change and evolve during the planning process due to a wide variety of reasons. Where a development involving ancient woods or veteran trees no longer remains a threat due to changing circumstance surrounding said application and based upon professional judgement steered by our conservation research, the Woodland Trust withholds the right to withdraw or amend its objection and review its approach.

The Woodland Trust is not a statutory body. As a charity, we provide all information in good faith, funded by public donations. For more information about this [visit here](#).



WOODLAND
TRUST

[Stand up for trees](#)

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<http://www.woodlandtrust.org.uk>



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

15th October 2019

Dear Sir/Madam,

Reference: East Hampshire Local Plan Large Development Sites consultation

The Woodland Trust appreciates the opportunity to comment on the above consultation.

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 24,000 hectares (59,000 acres) and we have 500,000 members and supporters.

Ancient Woodland

Natural England¹ defines ancient woodland *“as an irreplaceable habitat [which] is important for its: wildlife (which include rare and threatened species); soils; recreational value; cultural, historical and landscape value [which] has been wooded continuously since at least 1600AD.”*

It includes: *“Ancient semi-natural woodland [ASNW] mainly made up of trees and shrubs native to the site, usually arising from natural regeneration*

Plantations on ancient woodland sites – [PAWS] replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi”

Both ASNW and PAWS woodland are given equal protection in the National Planning Policy Framework (NPPF) regardless of the woodland's condition.

The Trust is concerned about a number of site allocations included in the **Large Development Sites consultation** as they could lead to the damage and loss of ancient woodland.

Planning policy

The National Planning Policy Framework, paragraph 175 states: *“When determining planning applications, local planning authorities should apply the following principles:*

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists;”

¹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

The Woodland Trust
Kempton Way
Grantham
Lincolnshire
NG31 6LL

Telephone

01476 581111

Facsimile

01476 590808

Website

woodlandtrust.org.uk

Footnote 58, defines exceptional reasons as follows: *“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”*

Impacts on ancient woodland

When land use is changed to a more intensive use, plant and animal populations are exposed to environmental impacts from outside of the woodland. In particular, the habitats will become more vulnerable to the outside influences, or edge effects, that result from the adjacent land’s change of use. These detrimental edge effects can result in changes to the environmental conditions within the woodland and consequently affecting the wood’s stable conditions.

Natural England’s standing advice for Ancient Woodland and Veteran Trees states: *“Nearby development can also have an indirect impact on ancient woodland or veteran trees and the species they support. These can include:*

- *breaking up or destroying connections between woodlands and veteran trees*
- *reducing the amount of semi-natural habitats next to ancient woodland and other habitats*
- *increasing the amount of pollution, including dust*
- *increasing disturbance to wildlife from additional traffic and visitors*
- *increasing light pollution*
- *increasing damaging activities like fly-tipping and the impact of domestic pets*
- *changing the landscape character of the area”*

Mitigation

Creation of new areas of woodland or buffer zones around semi-natural habitats, and more particularly ancient woodland, will help to reduce and ameliorate the impact of damaging edge effects, serving to improve their sustainability. The size of the buffer is dependent on the intensity of land use in the intervening matrix between ancient woods.

Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and Natural England recommend *“For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, **you’re likely to need a larger buffer zone.** For example, the effect of air pollution from development that results in a significant increase in traffic.”*

The size of a number of the site allocations suggests that large scale development is likely to take place. The minimum 15m buffer recommendation to all development **is not effective** in ensuring that ancient woodland within and/or adjacent to site allocations is not affected by potential future development. Buffers should be constructed on a case-by-case basis rather than a ‘one size fits all’ approach.

Conclusion

The Trust is concerned about the potentially adverse impacts that the proposed site allocations will have in relation to areas of ancient woodland within and/or adjacent to site allocations. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development.

The Woodland Trust **objects** to the inclusion of the below site allocations within the Local Plan, as large scale development is likely to cause damage and/or loss to areas of ancient woodland within or adjacent to their boundaries. For this reason we believe the sites in the table below are **unsound and should not be taken forward**. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

We hope you find our comments to be of use to you. The Woodland Trust is happy to provide any additional information or support regarding the protection of ancient woodland.

If you require any further information regarding points raised within this document, then please do not hesitate to contact us.

Yours faithfully,



Campaigner – Woods under Threat

Site reference name	Nearest Town	Development description	Woodland adjacent or within?	Type of woodland affected (e.g. ASNW, PAWS, secondary) & grid reference
Extension to Land East of Horndean	Horndean	Housing & associated facilities	Adjacent	Unnamed ASNW (SU7136211349) Forest of Bere PAWS (SU7105310927)
Northbrook Park	Farnham	Housing, employment & community facilities	Adjacent & within	Within: Unnamed PAWS (SU8058645108) Unnamed ASNW (SU8068445240) Adjacent: Ganscombe Copse/Doctors Copse PAWS (SU8042144986)
Chawton Park	Alton	Housing, employment & community facilities	Adjacent & within	Within: Unnamed PAWS (SU6908737316) Unnamed ASNW (SU6939937363) Unnamed ASNW (SU6977937803) Adjacent: Bushy Leaze Wood PAWS (SU6922637929)