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NON-EXEMPT

# EAST HAMPSHIRE DISTRICT COUNCIL

COUNCIL

23<sup>rd</sup> September 2021

## East Hampshire District Local Plan: Spatial Strategy Preferred Option

### FOR DECISION

Portfolio Holder: **Cllr Angela Glass**

Key Decision: Yes

Report Number: EHDC/024/2021

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#### 1. Purpose

- 1.1. This report was considered by the Planning Policy Committee on 6<sup>th</sup> July 2021 and the below recommendation agreed for onward submission to Full Council.
- 1.2. The report considers the options regarding the preferred option for the spatial strategy to feature in the emerging East Hampshire Local Plan.

#### 2. Recommendation

- 2.1. Members are requested to note the different spatial options for the EHDC Local Plan 2017-2038 and approve the preferred option (Option 2) for the spatial strategy to feature in the emerging East Hampshire Local Plan.

#### 3. Executive Summary

- 3.1. On 14<sup>th</sup> January 2021, the Full Council approved that a hybrid approach to progressing the East Hampshire Local Plan would be taken which involves the extension of the plan period by two years (2017-2038) to ensure there is a minimum of 15 years from date of adoption.
- 3.2. Following that decision, a new Local Plan timetable was published (February 2021) outlining the key stages in the preparation of the Local Plan. The next stage is for the Council to publish a draft version of the Local Plan 2038 and invite representations in accordance with Regulation 19. This is scheduled for April 2022.

- 3.3. Due to the time associated with the next stage of the Local Plan (Regulation 19) in April 2022, it is considered a preferred spatial strategy should be agreed beforehand to give clarity on the sites chosen to form development allocations. Having sites in the public domain early in the Local Plan process allows more detailed work to be undertaken in regard to the sites. It would allow design workshops with various stakeholders to commence to develop site specific policies, which include detailed design aspects, a requisite of Full Council agreement on 16<sup>th</sup> January, when approving a way forward for the Local Plan. Identifying the preferred spatial strategy may also assist with decisions on planning applications submitted ahead of this milestone.
- 3.4. The preferred spatial strategy will set out the level and type of development that is considered appropriate for different places. It will set out the number of new homes to be built over the plan period (2017-2038) in East Hampshire (outside the South Downs National Park - SDNP) and the locations to be allocated as part of the emerging Local Plan. The local housing needs for East Hampshire are established at a national level, by the Government, using its standard method. There is an expectation that this standard method will be used for plan-making purposes, with no real scope for the Council to intervene in this. The overall number of homes that is required is subject to change over time, per the standard method, and this is continually monitored by planning policy officers.
- 3.5. A total of four reasonable alternatives were identified, all meeting the identified local housing needs for East Hampshire (outside the SDNP), with varying levels of flexibility.
- 3.6. In addition to net completions, existing planning permissions and a windfall allowance, the preferred spatial strategy (Option 2) includes allocation to deliver approximately 3,800 additional new homes up to 2038. The additional housing is proposed to be predominantly met through a selection of 'core sites' that featured in the Draft Local Plan (February 2019) and are still considered suitable, available and achievable in terms of development, as well as a handful of other sites that were previously shared with members of Local Plan Working Group as part of early engagement workshops. In addition, the preferred spatial strategy would include approximately 819 further dwellings associated with on-going regeneration at the Bordon Garrison and Louisburg sites in Whitehill & Bordon; as well as approximately 1,200 dwellings at a sustainable urban extension at 'Land at Chawton Park Farm, Alton'.

#### **4. Additional Budgetary Implications**

- 4.1. None.

#### **5. Background and relationship to Corporate Strategy and/or Business Plans**

##### Background

5.1. In January 2018 work commenced on a new Local Plan in line with the legal requirement to review Local Plans every 5 years. In February 2019, the first draft Local Plan (Regulation 18) went out for public consultation. In September 2019, a second public consultation was undertaken on potential large development sites.

5.2. In May 2020, the Local Plan was progressing towards the next stage of plan-making (Regulation 19) with the Council expressing its current thinking with regards to the spatial strategy in June 2020. This was all in line with the Corporate Strategy's second theme of a safer, healthier, and more attractive East Hampshire and achieving this in part through developing and delivering a new Local Plan. However, since this time there have been a number of changes to the context of the Local Plan, most significant as follows:

- a. Government has proposed significant changes to the planning system through its 'Planning for the Future' White Paper (2020), with a renewed focus on delivering net gain (not just no net detriment) in built and natural environments;
- b. The COVID-19 pandemic, which has created a focus on dealing with the economic and social recovery;
- c. The climate emergency declared by EHDC and other public bodies;
- d. Biodiversity: nutrient neutrality is now sought from development in the southern parishes and the Itchen/Meon catchments. There is also a legislative requirement for biodiversity net gain; and
- e. Delays to LP programme and national policy requirements require an extension to the plan period, to 2038.

5.3. As a result of these changes the new preferred strategy to feature in the emerging Local Plan is orientated towards:

- a. The mitigation of and adaptation to climate change;
- b. Economic and social recovery from the pandemic;
- c. Conserving and enhancing biodiversity;
- d. Providing opportunities for building an increased number of new homes due to the extension of the plan period; and
- e. Supporting improvements to the quality and attractiveness of the built environment.

- 5.4. In January 2021, a hybrid approach to progressing the East Hampshire Local Plan was approved by Full Council. Following that decision, a new Local Plan timetable was published (February 2021) outlining the key stages in the preparation of the Local Plan. The next stage is for the Council to publish a draft version of the Local Plan 2038 and invite representations in accordance with Regulation 19. This is scheduled for April 2022.
- 5.5. Following Regulation 19 stage, the next stage is for the Council to formally submit the draft Local Plan 2038 and evidence base to the Planning Inspectorate for examination on behalf of the Secretary of State. An Independent Planning Inspector will assess the Plan against the tests of soundness contained in the NPPF, taking account of any representations (comments) received. If the Plan is found to be 'sound', the Council may adopt the Plan as soon as practicable following receipt of the Inspector's report unless the Secretary of State intervenes. This is expected by the end of 2023.
- 5.6. It is acknowledged that the next stage of the Local Plan (Regulation 19) is not until April 2022. It is considered that a preferred spatial strategy should be agreed ahead of this milestone to enable better progression of the Local Plan and in particular to better inform the site allocations chosen to deliver growth. In line with the Full Council's resolution (14<sup>th</sup> January 2021) to prepare a hybrid Local Plan, identifying a preferred spatial strategy will help focus on those aspects of the planned system which are to be retained within the new planning system, in particular site allocation policies including more emphasis on design standards.
- 5.7. The identification of sites to feature in the next stage of the Local Plan (Regulation 19) early in the plan-making process will allow further detailed work to be undertaken in relation to the chosen sites. With the new planning system having an emphasis on design, initial workshops can commence with site promoters, developers and other interested parties to develop site specific policies.
- 5.8. The current Local Plan, the Joint Core Strategy (JCS), was adopted in June 2014 and is now over five years old. The Council needs to have an up to date Local Plan in place as soon as possible to protect local areas from ad hoc development, and to help maintain 5 years supply of deliverable housing land (5YHLS). Whilst the Council (outside the SDNP) can currently (1st April 2020) demonstrate in excess of 5 years supply of deliverable housing land, it is unknown what this position will be going forward.
- 5.9. An additional benefit in identifying a preferred spatial strategy early in the plan-making process is more clarity on the direction of proposed growth for stakeholders and members of the public. The supplementary clarity of knowing development sites to feature in the emerging Local Plan ahead of Regulation 19 stage will be a

material planning consideration, which will provide further assistance with decisions on any speculative planning applications submitted ahead of this milestone.

### Conclusion

- 5.10. The East Hampshire District Local Plan remains a key strategy which is intrinsically linked to the Corporate Plan and part of the Planning Service Business Plan. Getting an approved and robust Local Plan in place as swiftly as possible remains the fundamental objective of the Planning Policy Team.
- 5.11. This advancement of the preferred spatial strategy ahead of the next stage of consultation (Regulation 19) is seen as necessary to better inform the site allocations chosen to deliver growth. Specifically, identifying sites early in the plan-making process will allow further detailed work in relation to site allocation policies, allowing design-led workshops with interested parties to deliver better quality development for our communities.
- 5.12. Additionally, agreeing the sites to feature in the emerging Local Plan ahead of Regulation 19 provides a further material consideration to assist determining any speculative applications for development that need to be determined leading up to the next stage.

## **6. Options considered**

- 6.1. Following on from an extensive site assessment and the Sustainability Appraisal process, four reasonable alternatives were identified for the Local Plan strategy to meet the needs of East Hampshire (outside the SDNP) for the duration of the plan period (2017-2038).
- 6.2. These options all involve a selection of 'Core Sites', namely sites that featured in the Draft Local Plan (2018) and were still considered suitable, available and achievable in terms of development, as well as a handful of additional sites that were previously shared and discussed with members of the Local Plan Working Group. These options also all involve approximately 819 dwellings associated with growth at Whitehill & Bordon (note a reduction in quantum from the Draft Local Plan due to insufficient mitigation in regard to the Wealden Heaths Phase II Special Protection Area (SPA)).
- 6.3. Therefore, the four reasonable alternatives consist of the above, plus one of the following sites or collections of sites:

- 1) A selection of 'other sites' – White Dirt Farm (Horndean), Land at Five Heads Road (Horndean), Whitedown Lane (Alton) and Land east of Old Odiham Road (Alton);
- 2) Land at Chawton Park Farm (Alton);
- 3) Land at Neatham Down (Alton);
- 4) Two South Medstead large development sites.

6.4. The above reasonable alternatives would all meet the identified local housing needs for East Hampshire (outside the SDNP), with differing levels of flexibility. Based on an assessment of site capacities and an understanding of existing housing commitments and completions (2017-2020), Option 1 would deliver the smallest number of additional new homes, whilst Options 2 and 4 would deliver the largest number. This means that Options 2 and 4 are the most flexible in terms of mitigating the risk to the soundness of the Local Plan strategy from future changes in housing requirements. It is important to note that the Government's standard method for estimating housing requirements changes the calculation of needs on an annual basis, with (e.g.) the potential for increases to requirements in East Hampshire arising from any worsening in housing affordability between now and the Local Plan examination.

6.5. There is no substitute for having an up to date Local Plan when it comes to protecting our local communities from speculative development and proactive planning to shape our places, including the provision of adequate infrastructure. However, the Local Plan is not expected to be adopted until 2023. The next stage of Local Plan preparation involves the publication of a Regulation 19 Draft Local Plan detailing the strategy, sites and supporting policies to guide development to meet East Hampshire's (outside the SDNP) identified local housing needs. Until this time, the publication of a preferred strategy will go some way to assist with any decision making on applications submitted in advance of this stage.

6.6. Although all reasonable alternatives would meet the identified local housing needs, it is considered Option 2, which includes land at Chawton Park Farm, Alton would best address these needs in the most sustainable and flexible manner. At this stage in the plan-making process, it is considered that concentrating additional growth on the sites comprising this option would:

- Be compatible with national planning policy with regard to avoiding development in those areas at the highest risk of flooding;
- Provide new community infrastructure at a new community at Chawton Park Farm, whilst delivering a significant number of affordable homes; contributing to biodiversity net gain; and increasing access to natural recreational opportunities;

- Support on-going regeneration at Whitehill & Bordon, including through making best use of previously developed land, in a manner that would not conflict with the Council's obligations to protect internationally designated sites (e.g. the Wealden Heaths Phase II SPA and Woolmer Forest and Shortheath Common Special Areas of Conservation (SACs));
- Deliver additional new homes and business premises in Alton, taking advantage of proximity to the town's existing facilities and services whilst offering the opportunity to effectively mitigate impacts on local infrastructure;
- Deliver new housing in the southern parishes of Horndean, Clanfield and Rowlands Castle, by meeting the "duty to co-operate" with other planning authorities in South Hampshire in a way that would mitigate landscape impacts (e.g. on the setting of the SDNP); mitigate impacts on local biodiversity; and avoid impacts on the internationally designated sites of the Solent; and
- Deliver housing and employment opportunities, including for travelling communities, on small sites that would support SMEs and be compatible with national planning policy.

6.7. The remaining three 'reasonable alternatives' share many of the foregoing benefits with Option 2, often due to the large degree of overlap between options (i.e. the 'core sites'). However, the following bullet points highlight the areas where each of the remaining options is considered to be weaker:

- Option 1: incremental expansion at Alton and Horndean would not deliver the same level of new community infrastructure (e.g. a new primary school), whilst all of the sites in this option – despite having their own merits – raise concerns with respect to local landscape impacts, due to local topography or their location on approaches to the settlements of Alton or Horndean
- Option 3: potential adverse impacts on the landscape of the Wey Valley and the setting of Alton have been identified in respect of the site of Neatham Down, whilst there are concerns that the A31 – as a physical and psychological barrier – would hinder the integration of a new community with Alton.
- Option 4: Four Marks and South Medstead offers fewer local services and facilities than (e.g.) Alton, with no access to the mainline railway network. A review of transport data has highlighted that this area is relatively car dependent, raising concerns that an option involving significant new development at South Medstead would be less responsive to the climate emergency. The Council's SA Scoping Report has identified that transport

emissions are a significant contributor to greenhouse gas emissions in East Hampshire.

- 6.8. There are risks and constraints associated with all four options, however it is considered Option 2, involving 'Land at Chawton Park Farm' is best placed to mitigate any adverse implications associated with development. The housing numbers associated with Option 2 also provide sufficient flexibility to adapt to rapid change should sites fail to deliver, a requisite of national policy<sup>1</sup>. Option 2 is therefore the preferred option for the spatial strategy.
- 6.9. The preferred option still requires further testing through the plan-making process, most notably with respect to transport-related impacts. All of the reasonable alternatives also require further work through the sustainability appraisal process. However (as noted above), much technical work has already been undertaken, giving the Council confidence that the additional work can be progressed whilst engaging with communities and stakeholders during the summer and autumn of 2021 on the preferred option.
- 6.10. It should be noted that other options might also be tested through the Sustainability Appraisal process, if consultants advise that it is appropriate to do so.

## **7. Resource Implications**

- 7.1. Financial Implications – None

### **Section 151 Officer comments**

Date: 24<sup>th</sup> May 2021

No additional financial implications.

- 7.2. Human Resources Implications – there are no additional staffing requirements from the proposed course of action.
- 7.3. Information Governance Implications – None.

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<sup>1</sup> National Planning Policy Framework (NPPF) – Paragraph 11



7.4. Other Resource Implication – None.

7.5. Information Governance Implications – None.

7.6. Other resource implications – None.

**8. Legal Implications – Surinder Atkar, Planning Solicitor (email: atkar@havant.gov.uk)**

8.1. The preparation of a Local Plan is governed by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Identifying a preferred spatial strategy to feature in the emerging Local Plan ahead of Regulation 19 stage would further aid meeting the Council's statutory duty to prepare an up to date Local Plan. Its preparation will be in line with the legal requirements of the current planning system.

8.2. Section 19 of the Planning & Compulsory Purchase Act 2004 requires that a sustainability appraisal is carried out on the proposals of a Local Plan. The Environmental Assessment of Plans and Programmes Regulations 2004 ensure that the potential environmental, social and economic effects of development are considered through the sustainability appraisal (SA) process. The Council has been working with its consultants, AECOM, on a SA of the emerging Local Plan, to ensure that the regulations are met during the plan-making process. The Council will continue to work towards the production of a SA Report for the Regulation 19 stage of its emerging Local Plan. Identifying a preferred spatial strategy does not affect this process but reflects the emerging work towards the production of the SA Report.

8.3. A Habitats Regulations Assessment is being undertaken for the emerging Local Plan. The objective of the assessment is to identify any aspects of the Plan that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as Special Areas of Conservation (SACs), Special Protection Areas (SPAs), (as a matter of Government policy) Ramsar sites, and 'potential' sites for any such designations, either in isolation or in combination with other plans and projects. The HRA process is continuous throughout Local Plan development and is embedded by the Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The Council has been working with its consultants, AECOM, on the HRA for the emerging Local Plan and will continue to work on the Regulation 19 stage.

Identifying a preferred spatial strategy does not affect this process but reflects on-going work, including discussions with Natural England.

### **Monitoring Officer comments**

Date: 20<sup>th</sup> May 2021

The Legal Implications section of this report sets out the procedure to be followed in establishing the housing allocation for the District under section 19 of the Planning and Compulsory Purchase Act 2004 and also identifies other relevant statutory requirements to be followed at this stage of the procedure for the Local Plan.

## **9. Risks**

- 9.1. Each stage of the emerging Local Plan produced to date has followed a statutory process. The risks associated with each option is set out above.
- 9.2. The key risks shown for not identifying a preferred spatial strategy ahead of Regulation 19 stage are:
- Site allocation policies that do not benefit from the input of all interested parties to best address the emphasis of design standards promoted in the new planning system.
  - Speculative development and planning by appeal with no additional material consideration to assist in decision making.

## **10. Consultation**

- 10.1 Members have been briefed on the potential options available for future growth in East Hampshire (outside the SDNP) and the likely implications associated with each option. This report explores the options available to us in terms of a spatial strategy, considering those implications. Members have therefore been briefed and shared their initial thoughts on a preferred spatial strategy to feature in the emerging Local Plan.
- 10.2 To date the Local Plan has undergone two formal Regulation 18 stage consultations, with the next formal consultation taking place in April 2022 as part of the Pre-submission (Regulation 19) stage. The preferred spatial strategy identified within this report, along with site specific policies and supplementary infrastructure planning will form part of this formal consultation, which will involve extensive engagement with statutory consultees, stakeholders and members of the public.
- 10.3 Consultation on the Local Plan will continue in line with the statutory requirements.

## **11. Communication**

- 11.1 Once agreed by the Planning Policy Committee and subsequently approved by Full Council, the preferred spatial strategy to feature in the emerging Local Plan will be published on the Council's website with stakeholders contacted to inform them of the decision and way forward. In particular, those representing sites chosen to deliver future growth will be invited to have more detailed discussions around specific policies related to the site.
- 11.2 The preparation of the Local Plan is supported by a communications strategy which will continue to be updated.

## **12. Appendices**

- 12.1. Appendix A - Spatial Strategy: Definition of the Preferred Option and Maps of Reasonable Alternatives

## **13. Background papers**

- 13.1. None

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Agreed and signed off by:

Portfolio Holder: Angela Glass (signed off on 26<sup>th</sup> May 2021)

Director: Simon Jenkins (signed off on 25<sup>th</sup> May 2021)

Monitoring Officer: Daniel Toohey (signed off on 26<sup>th</sup> May 2021)

Section 151 Officer: Lydia Morrison (signed off by Matthew Tiller obo Lydia Morrison on 24<sup>th</sup> May 2021)

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