



Objection to Planning Application 55318/001

Dear Samantha Owen,

I am writing to extend my objection to planning application 55318/001 for the proposed development at Land west of Beechlands Road, South Medstead, Alton. My objection is based on significant concerns regarding the application of Paragraph 11 of the National Planning Policy Framework (NPPF) due to identified procedural deficiencies in the planning application process, as well as additional systemic issues that have come to light.

KEY CONCERNS

Accuracy and Transparency of Housing Supply Data

Discrepancies in Housing Supply Estimates:

The Housing Land Supply Assessment prepared by Pegasus Group on behalf of Bargate Homes identifies significant errors in the Council's calculation of the deliverable housing supply. The assessment for the recent Four Marks appeal demonstrated that the Council's figures were inaccurate, showing a supply of 1,994 homes instead of the 2,198 claimed. Pegasus Group's further review suggests even more substantial discrepancies, reducing the deliverable supply to 1,608 homes, equating to only a 3.47-year supply. These errors question the reliability of the Council's data and the transparency of the process.

Council's Position on Deliverable Supply:

Despite acknowledging the errors in their own assessment, the Council maintained its position at the Four Marks appeal, which was subsequently found lacking by the Inspector. This insistence on using incorrect figures indicates a deeper issue with data accuracy and procedural integrity within the Council's planning processes.


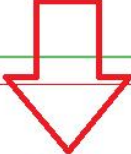


Procedural Integrity and Public Trust

Draft Local Development Plan Classification Error:


The draft local development plan, which passed the consultation stage on 1st May 2024, incorrectly classified the plot of land as being in Four Marks instead of Medstead. This error could misguide planning considerations and demonstrates a lack of accuracy in the planning process.

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FMS1 – Land west of Lymington Barn

LAA Reference	MED-022
Site Size (Ha)	4.6 ha
Existing Use	Agriculture
Proposed Future Use	Housing
Proposed Number of Homes	90



REF: [FOI – REF-191888-D3L9 – LOCAL DEVELOPMENT PLAN](#)

REF: [EHDC LOCAL PLAN](#)



Re-purposed NHS Comment:

The NHS comment submitted for planning application 27000/005 appears to have been repurposed for this application, raising concerns about the relevance and accuracy of the assessment. This practice undermines the specificity and validity of the comments provided.

Lack of Supervision:

There seems to be no effective supervision over the impartiality of the assessments provided by developers, nor oversight to prevent misinformation, omission of information, or the presence of an unreasonable amount of uncategorised documentation.

Misleading Housing Supply Figures:

The failure to provide actual and relevant figures regarding the current and estimated population increase due to recent developments (which have increased the village population by over 40% in recent decades) suggests a lack of transparency and accuracy.

Cumulative Environmental Impact

Absence of Full Environmental Impact Assessments (EIA):

Despite the significant population growth and development in Medstead, there has been no comprehensive EIA to assess the cumulative impacts. The lack of such assessments fails to address the cumulative significance of multiple developments.

REF: FOI – REF-191888-D3L9 – POPULATION

REF: FOI – REF-191888-D3L9 – EHDC SPREADSHEET “DWELLINGS COMPLETIONS IN FOUR MARKS AND MEDSTEAD BETWEEN 2011 AND 2023 (APR-MAR) BY PARISH

REF: EHDC – REQUEST FOR SCREENING OPINION – RESIDENTIAL DEVELOPMENT COMPRISING 60 DWELLINGS – LAND NORTH OF, BOYNESWOOD LANE, MEDSTEAD, ALTON – HAMPSHIRE COUNTY HIGHWAYS



Impact on Local Infrastructure and Services:

The continuous development without comprehensive EIAs or consideration of cumulative impacts puts significant strain on local infrastructure and services, adversely affecting the community's quality of life and sustainability.

Context-Specific Thresholds:

The criteria for requiring an EIA are generic and should consider the type of settlement. Rural villages like Medstead, with their unique environmental, social, and infrastructural contexts, should have lower thresholds for triggering an EIA.

Systemic Issues in the Planning Process

Conflict Among Councillors:

The pressures of meeting housing targets have reportedly caused conflicts among councillors, which further indicates a dysfunctional planning system that is not conducive to making balanced and objective decisions.

REF: [EHDC EMAIL BULLETINS – 2022-06-17: EHDC TO CONSULT AGAIN ON LOCAL PLAN FOLLOWING ‘BRUTAL’ HOUSING TARGETS](#)

Functional Integrity of the Planning Application System:

The identified errors and systemic issues undermine the assumption that the planning application process is fully functional and robust. This assumption is critical for the applicability of the tilted balance under Paragraph 11 of the NPPF.

Need for Independent Audit

Independent Audit of EHDC Planning Procedures:

Given the significant procedural deficiencies identified, there is a need for an independent audit of the EHDC's planning application procedures. This audit should assess data accuracy, transparency, procedural integrity, and the impartiality of assessments provided by developers.



Inventory of Impact from Recent Developments (2011-2023)

Inventory of Impact:

Before allowing any further multi-house developments, there should be a comprehensive inventory of the impact that the vast population increase has had on the village. This inventory should assess the effects on local infrastructure, services, environment, and community well-being. Only with this understanding can future developments be planned sustainably.

Conclusion

Given the significant procedural deficiencies identified in the housing supply assessment process, classification errors in the draft local development plan, reuse of assessments, lack of comprehensive EIAs for cumulative impacts, the need for an independent audit of EHDC planning procedures, and the necessity for an inventory of the impact from recent developments, it is inappropriate to apply the tilted balance under Paragraph 11 of the NPPF. Ensuring data accuracy, transparency, and procedural integrity is crucial for the functionality of the planning application process. The systemic issues highlighted further undermine the EHDC's planning process and its ability to handle planning applications fairly and sustainably.

I strongly recommend a thorough review of the housing supply assessment process, the correction of the draft local development plan, and the implementation of a full Environmental Impact Assessment (EIA) for the proposed development to provide a comprehensive evaluation of its impact on the local environment and community. Furthermore, an independent audit of EHDC's planning procedures and a comprehensive inventory of the impact from recent developments are essential to restore public trust and ensure the robustness of the planning application process.

Thank you for your attention to this matter.

Sincerely,

Note: For privacy reasons, all personal information including a signature has been attached as a separate document, as any comments on the planning application are intended to be published by EHDC.