



Beechlands Road, Medstead

Planning Statement (incorporating Sustainability Statement and Affordable Housing Statement)

Bargate Homes

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Basis of Report

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1.0 Introduction

- 1.1 SLR Consulting has been instructed by the applicant, Bargate Homes Ltd (hereafter 'Bargate'), to prepare a planning statement in support of the submission of an Outline planning application to East Hampshire District Council (EHDC) for the residential development of land to the west of Beechlands Road in Medstead (hereafter referred to as 'the site'). The development is proposed to be for up to 70 homes, including 40% affordable homes, and will include associated car parking, landscaping, drainage infrastructure, play provision, biodiversity gain, and vehicular and pedestrian access from Beechlands Road. An extract from the illustrative masterplan for the site is shown below:



Figure 1: Illustrative Masterplan

- 1.2 This Planning Statement presents an analysis of the application site and surrounding area and sets out the relevant planning history and planning policy context. The Statement explains why the proposed development is appropriate, having regard to the key planning policy, as well as technical and environmental considerations.
- 1.3 An Affordable Housing Statement is incorporated into this document at Section 8 which sets out the approach to the provision of affordable housing on the site, alongside justification for the proposed housing mix. A Sustainability Statement is



incorporated at Section 9 which sets out the energy saving measures to be included within the development that will contribute to climate change reduction targets. At Section 10 of this statement, draft s106 Heads of Terms are included setting out anticipated headings for the necessary s106 agreement.

- 1.4 The final section provides a summary alongside the planning balance to demonstrate that the proposals are acceptable having regard to local and national policy; and why therefore that the application should be approved.
- 1.5 The planning application, along with this Planning Statement, is supported by and should be read in conjunction with the suite of plans, reports and other documentation, as set out in the submitted covering letter.



2.0 The Site and Surroundings

Site Location and Description

2.1 The application site is located within the Medstead Parish of East Hampshire District Council and is approximately 600m to the north of the settlement of Four Marks. The site itself is located to the south of Five Ash Road, and sits between Beechlands Road to the east, Stoney Lane to the west and Boyneswood Lane to the south. Within the area between these three roads are two small separate fields that do not form part of the site. Stoney Lane and Boyneswood Lane are public rights of way (bridleways no. 155/31/1 & 155/33/1 respectively).

2.2 An extract of the Site Location Plan is shown below:

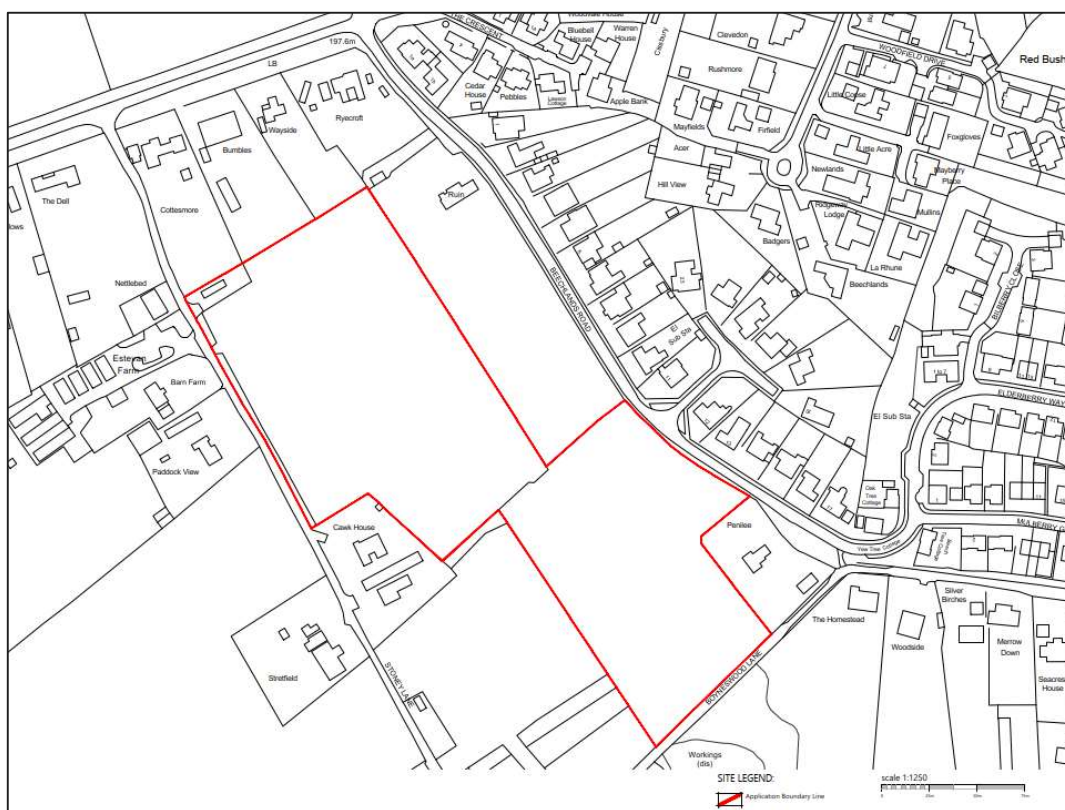


Figure 2: Site Location Plan

2.3 The 3.28Ha site comprises two small-scale, grassland fields currently used for horse grazing and a small fenced off area in the north-west corner comprising horse stables. A line of mature trees (mixture of Category A, B and C) runs along the eastern boundary of the north-western field, and a dwelling known as 'Cawk House' is located within its south-west corner (accessed from Stoney Lane). The south-eastern field is bound by Category C tree and hedgerow vegetation. In the south-east corner of this field is a dwelling known as Penilee (accessed from Boyneswood Lane).

2.4 To the east of the site on the opposite side of Beechlands Road is an estate of mainly detached residential properties including relatively new properties at



- Mulberry Gardens. Further existing dwellings are located to the north of the site along Five Ash Road. To the immediate west and south of the site are a number of small fields interspersed with dwellings and other structures.
- 2.5 The site is located entirely within the administrative boundary of East Hampshire District Council (EHDC), within the Neighbourhood Plan boundary of Medstead and Four Marks. The site sits outside the boundary of the South Downs National Park (which at its nearest point is approximately 1km to the east) and is not located within any area formally designated for environmental, landscape or archaeological features.
- 2.6 The Chawton Park Wood Site of Nature Conservation Importance (SNCI) and an Archaeological Area of Importance is located approximately 500m to the north-east of the site. Other smaller SNCI designations are located within 1km of the site including: the Redhill Copse SNCI (approx. 430m to the north-east), and the South Town Wood SNCI (approx. 870m to the north-west).
- 2.7 The EA Flood Map for Planning confirms that the site is situated entirely within Flood Zone 1, meaning it has a low probability of flooding. No international designations (including SPA's or SSSI's) are located within 5km of the site.



3.0 Planning History

3.1 A list of planning applications most relevant to the site is provided in the table below:

Date	Reference Number	Site	Description	Outcome
Jan 2014	55318	Land East of Cawk House, Stoney Lane, Medstead, Alton	Request for EIA Screening Opinion for residential development of 144 dwellings	EIA not required
Nov 2013	55258	Land north of, Boyneswood Lane, Medstead, Alton (Mulberry Gardens)	Request for EIA Screening Opinion for residential development of 60 dwellings	EIA not required
Dec 2014	55258/001	Land north of, Boyneswood Lane, Medstead, Alton (Mulberry Gardens)	Outline – Development of 51 dwellings	Appeal Allowed (A/14/2225146) – December 2014

Table 1: Planning History

- 3.2 Save for the EIA Screening request in 2014 for a development of 144 homes on the application site; there is no planning history of note within the site. This EIA Screening concluded that a residential development of this scale would not constitute EIA development. A formal planning application for this development was not forthcoming.
- 3.3 A successful housing development of 51 homes to the south-east of the application site was permitted in 2014 and has since been built out by Bargate Homes (Mulberry Gardens / Elderberry Way). This development showcases the high-quality housing that Bargate Homes intend to deliver on the application site.
- 3.4 The application site (as part of a larger site area covering 25 hectares) was promoted to the Council as part of the 2019 Large Sites Consultation. The site promotion (known as South Medstead) proposed that 600 homes could be delivered, alongside a 2-form entry primary school, 2ha employment land, and land for gypsy and traveller pitches.



4.0 Application Proposal

- 4.1 The planning application proposes the following:
Outline application with all matters reserved except for access, for up to 70 dwellings with vehicular and pedestrian accesses, public open space, landscaping and drainage and associated works.
- 4.2 The proposal is submitted in Outline and will comprise a mix of private and affordable homes, including a variety of house types and sizes to cater for identified local needs. At this Outline stage, the precise mix of housing is indicative, but is proposed to include a range of 1-, 2-, 3-, and 4-bedroom 2-storey houses, as well as the provision of single-storey bungalows fronting onto Beechlands Road.
- 4.3 The proposed development will provide a policy compliant number of homes of affordable tenure (40% as required by CS Policy CP13), including an appropriate tenure split between affordable rent, shared ownership and first homes to reflect current local needs.
- 4.4 Access to the site will be proposed in full detail. Vehicular access will be provided via a simple bell-mouth junction at Beechlands Road, and additional pedestrian and cycle accesses will be provided in four separate locations to connect the site to the adjoining public rights of way networks and existing public footpaths.
- 4.5 Public open space will be provided within the site, including a formal play area at the site entrance which will be accessible to both new residents of the site and existing residents living nearby. A play area comprising natural play equipment for a range of age groups would be provided, along with sheltered seating for older children to utilise. Other green spaces within the site will comprise a mixture of natural and semi-natural spaces at the site boundaries, and additional open/informal amenity spaces which will include pathways, native planting and bench seating for residents to enjoy.
- 4.6 The vast majority of existing native hedgerows and trees along the site's boundaries would be retained and enhanced, with only 2no. Category C trees (T4 and T5) and 2no. sections of Category C hedgerow (parts of H1 and H6) proposed for removal to facilitate the development. New native planting, street trees and ornamental planting will be included in the site design. Owing to the additional native planting proposed (as well as other measures to enhance and protect habitats), coupled with provision for offsite enhancements as allowed for by the BNG regulations and guidance, a positive net gain in biodiversity can be demonstrated by the project as a whole.
- 4.7 The detailed design and layout of the site is reserved for future agreement at reserved matters stage, but approval is sought for a series of parameter plans, showing development areas, land uses, suggested street hierarchy and connectivity and storey heights which together will provide the framework for the detailed proposals to come forward at reserved matters stage. Alongside the parameter plans an indicative layout has been submitted as part of this Outline proposal to



demonstrate how the proposed quantum of units can be appropriately accommodated within the site whilst retaining the important site characteristic and respecting the wider landscape character and neighbouring amenity. The masterplan shows that each home has its own private outdoor amenity space, as well as sufficient off-road allocated parking. An indicative Landscape Masterplan also provides an indication of the future landscape proposals that could be incorporated.

- 4.8 Bargate Homes are an experienced local housebuilder and are committed to delivering an excellent development that accords with the unique local character of Medstead and its surrounds. The recent development of 51 homes at Mulberry Gardens (to the immediate south-east of the application site) is an example of the exceptional quality and excellence that Bargate Homes are capable of delivering and is a real-life example of what this site can achieve for future residents.
- 4.9 A suite of measures will be incorporated into the design of each home to ensure the sustainability credentials meet the Council's ambitious targets for climate change reduction, and to empower new residents to make adaptations to a more sustainable way of living. Section 9 (Sustainability Statement) of this statement explains how water and energy reduction measures will be included in the fabric of each home to ensure the development contributes to meeting these targets.



5.0 Pre-Application Engagement

- 5.1 A programme of community engagement has been undertaken in respect of this development proposal in the months preceding application submission. This active engagement demonstrates that a thorough approach has been taken to pre-application consultation with local residents and community groups, as well as ongoing engagement with District and Parish Councillors at East Hampshire District Council and Medstead Parish Council.
- 5.2 Full details of the pre-application engagement that has been undertaken to support the evolution of this scheme and the current planning submission is provided in the accompanying Statement of Community Involvement (SCI). The programme outlined in the SCI reflects the principles for consultation in the Localism Act (November 2011) and in the National Planning Policy Framework (NPPF) (updated December 2023). The NPPF states that early engagement has *“significant potential to improve the efficiency and effectiveness of the planning application system for all parties.”* It also indicates that good quality pre-application discussion *“enables better coordination between public and private resources and improved outcomes for the community.”*
- 5.3 Actions that have been undertaken as part of the consultation process have included:
- **22 March 2024** – Letters sent to local residents to introduce the development proposal, and to invite comments via the consultation website. These letters were sent to 753 separate addresses.
 - **25 March 2024** – Dedicated consultation website launched (consultation closed Sunday 21st April 2024).
 - **25 March 2024** – Individual letter sent to each of the three ward Councillors, and to Medstead Parish Council to invite comments on the proposed development, and to offer a meeting to discuss the proposals.
 - **17 April 2024** – Presentation to Medstead Parish Council, with presentation slides shared for inclusion on the Parish website.
- 5.4 The accompanying SCI (prepared by SLR Consulting) presents an analysis of the feedback received from the website consultation (which includes 39 sets of comments), and from the meeting with Medstead Parish Council.
- 5.5 Section 4.0 of the SCI provides Bargate Home’s responses to the main themes raised through the feedback.
- 5.6 In summary, as required by the Localism Act and encouraged within the NPPF, Bargate Homes has sought to undertake active early engagement with the local community and other local stakeholders in the design evolution of this site. As outlined within the accompanying SCI, Bargate Homes has undertaken engagement and consultation which has raised awareness of the plans and offered residents and stakeholders a chance to comment on and influence the proposals



prior to the submission of the application to the Council. Bargate Homes has welcomed the feedback received throughout this process and has sought to make design changes where necessary to improve the quality of the proposed development of the site.



6.0 Planning Policy Context

6.1 This section sets out the key relevant planning policy at national and local levels. Section 7 will then discuss the principle of development, as it relates to the relevant policies and why the scheme is considered acceptable when taking account of the adopted plan, and material considerations.

6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise. The following section will first note the national policies of relevance before focusing on the local policies considered of most relevance to the consideration of the proposal for the site.

National Planning Policy Framework (NPPF, December 2023)

6.3 The most recent National Planning Policy Framework (NPPF) was updated in December 2023 and continues to establish a presumption in favour of sustainable development. **Paragraph 2** states that the NPPF is a material consideration in planning decisions.

6.4 **Paragraph 8** confirms that there are three dimensions to sustainable development – economic (building a strong, competitive economy); social (providing the supply of housing required to meet needs and creating a high quality-built environment); and environmental (protecting and enhancing the natural, built and historic environment). **Paragraph 9** confirms that these roles should be delivered through the preparation and implementation of plans and the application of policies but also taking into account local circumstances to reflect the need and opportunities in each area.

6.5 **Paragraph 11** stresses that plans and decisions should apply a presumption in favour of sustainable development. Development plans should positively seek opportunities to meet the development needs of the area, and proposals should accord with an up-to-date development plan, or where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- i) The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

6.6 **Footnote 8** of the NPPF clarifies that the presumption in favour applies in situations where the local planning authority cannot demonstrate a five-year supply (or a four-year supply where applicable, as per paragraph 226) of deliverable housing sites; or,



where the housing delivery test indicated that delivery is below 75% of the requirement over the previous three years.

- 6.7 **Paragraph 12** states 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. If material considerations in a particular case indicate that the plan should not be followed, local planning authorities may take decisions that depart from an up-to-date development plan.
- 6.8 **Paragraph 14** confirms that where the presumption (at paragraph 11d) applies, the adverse impact of allowing development that conflicts with a neighbourhood plan is likely to outweigh the benefits provided that the neighbourhood plan was made within the previous 5 years, and the plan contains policies and allocations to meet its identified needs. The Medstead and Four Marks Neighbourhood Plan is well over 5 years old (having been made in 2016), and as such does not benefit from the protections of paragraph 14.
- 6.9 **Paragraph 20** relates to strategic policies where it is set out that these policies should make sufficient provision for: housing (including affordable housing), employment, commercial development and infrastructure.
- 6.10 In terms of determining applications, **paragraph 38** of the framework states that it is a requirement for Local Planning Authorities to approach decisions in a positive and creative way. Planning Authorities should also work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, whilst seeking to approve applications for sustainable development where possible.
- 6.11 **Paragraph 47** reiterates the requirements set out in planning law that applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise. It actively encourages decisions on applications to be made as quickly as possible.
- 6.12 **Paragraph 55** states that planning conditions can be used to make a development acceptable, where it might otherwise be unacceptable. Paragraph 56 goes on to say that the use of conditions should be kept to a minimum and only imposed if necessary, relevant, enforceable, precise and reasonable in all respects.
- 6.13 **Section 5** (delivering a sufficient supply of homes) sets out clearly that the Government is committed to significantly boosting the supply of homes (**paragraph 60**) in order to meet local needs and help make sure that land with permission is developed without unnecessary delay.
- 6.14 **Paragraph 63** states that the size, type and tenure of housing needed for different groups in the community should be reflected in planning policies, and should include



those who require affordable housing, older people, people with disabilities, travellers, and people wishing to build their own homes.

- 6.15 **Paragraph 77** requires local planning authorities that do not have an adopted plan that is less than 5 years old to identify an annual supply of deliverable sites sufficient to provide a minimum of 5 years' worth of housing calculated against the latest local housing needs figure (or a minimum of 4 years of housing if provisions of paragraph 226 apply). **Paragraph 226** allows local planning authorities that (as of December 2023) have an emerging local plan with housing allocations that has been submitted for examination or reached at least Regulation 18 or 19 stage; to identify a minimum 4 years' supply of deliverable housing sites against local housing need targets. Recent appeals in East Hampshire have indicated that the district has a 3.59-year supply of housing; and further scrutinization within the submitted Housing Land Supply Assessment (by Pegasus) calculates the current position as being 3.47 years' supply. As such, the East Hampshire district has neither a 4 nor a 5-year housing supply at this current time.
- 6.16 **Section 8** of the framework seeks to promote healthy and safe communities, with **Paragraph 102** highlighting the importance of providing access to a range of high-quality open spaces and opportunities for sport and physical activity in order to promote the health and wellbeing of communities.
- 6.17 **Section 9** of the framework supports the provision of sustainable modes of transport, with **Paragraph 108** stating that transport issues should be considered from the earliest stages of plan making so that the potential impact of development on transport networks can be addressed, and so that opportunities to promote walking, cycling and public transport use are identified and pursued. **Paragraph 109** states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 6.18 Paragraph 115 is clear that 'Development should only be prevented or refused on highways grounds if there would be an **unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe** [our emphasis].
- 6.19 **Paragraph 116** states that new development should give priority to pedestrian and cycle movements, should facilitate access to high quality public transport, should address the needs of people with reduced mobility, and should be designed to create places that are safe, secure and attractive.
- 6.20 **Section 11** relates to making the most effective use of land to make sure that decisions meet the need for housing as effectively as possible whilst improving the environment and making safe and healthy communities. **Paragraph 128** requires decisions to support developments that make efficient use of land taking into account the identified need for different types of housing and other forms of development as



well as the importance of securing well-designed and beautiful, attractive and healthy places.

- 6.21 **Section 12** of the framework covers design, where the Government attaches great importance to the design of the built environment. This policy highlights that good design is a key aspect of sustainable development, which should be indivisible from good planning, which in turn should contribute positively to making places better for people and help make developments acceptable to communities.
- 6.22 **Paragraph 165** states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 6.23 **Section 15** covers the natural environment. **Paragraph 180** stresses the importance of protecting and safeguarding ecological networks, including national and locally designated sites of importance to biodiversity, wildlife corridors. It also promotes the conservation, restoration and enhancement of priority habitats, ecological networks and the protection of priority species. **Paragraph 180 (d)** seeks for a net gain in biodiversity to be demonstrated, which accords with the requirement set out in the Environment Act 2021 to secure a minimum of 10% biodiversity net gain.
- 6.24 **Paragraph 186(d)** states that developments that conserve or enhance biodiversity should be supported and that opportunities to incorporate biodiversity improvements in and around developments should be encouraged.

Local Planning Policy – East Hampshire District Council

- 6.25 The application site is located within the jurisdiction of East Hampshire District Council (EHDC) where the adopted development plan comprises the following:
- **Joint Core Strategy** (Part 1 Local Plan) – adopted 8 May 2014
 - **Housing and Employment Allocations** (Part 2 Local Plan) – adopted 7 April 2016
 - **Saved Policies** from the East Hampshire Local Plan: Second Review – adopted March 2006
 - **Medstead and Four Marks Neighbourhood Plan** (Made 12 May 2016)
- 6.26 The above adopted policy documents cover the area of the East Hampshire district outside the boundary of the South Downs National Park Authority (SDNPA). In July 2019 the SDNPA adopted its own Local Plan to cover planning matters within the park. As the site is located outside the National Park boundary, only the policies contained within the adopted East Hampshire development plan are relevant in the case of this application.
- 6.27 In addition to the adopted local plan documents, a number of Supplementary Planning Documents (SPDs) are relevant to residential development proposals in the



district. These documents form a material consideration in planning decisions, and include:

- Climate Change and Sustainable Construction SPD (adopted April 2022)
- Housing Outside Settlement Boundaries SPD (adopted March 2023)
- Vehicle Parking Standards SPD (adopted July 2018)

6.28 The Housing Outside Settlement Boundaries SPD was adopted by the Council in March 2023 and has the purpose of elaborating on adopted policy CP10 of the Joint Core Strategy in relation to the Council's position on determining applications for development outside settlement boundaries. The SPD considers the evidence required to support the four tests that are required to be met in order for development proposals to be considered positively. The tests for judging the acceptability of development outside the settlement boundary include:

1. Meets a community need / aspiration.
2. Reinforces a settlement's role and function.
3. Cannot be accommodated within the built-up area boundary.
4. Has been identified in an adopted Neighbourhood Plan or has clear community support.

6.29 As both Local Plan Part 1 (Core Strategy) and Part 2 (Housing and Employment Allocations) are over 5 years old, EHDC has commenced work on a new Local Plan (Draft Local Plan 2021-2040). In January 2024 the Council published the draft (Regulation 18) version of the plan which was subject to a 6-week period of public consultation. A proposed submission plan (Regulation 19) is awaited and understood to be scheduled for publication in July 2024 with an examination targeted for early 2025 and adoption in September 2025.

6.30 Whilst the Local Plan Review is underway, the Regulation 18 draft plan carries limited weight in decision making at this stage. Notwithstanding this, the strategy presented in the Regulation 18 draft plan indicates a direction of travel for the future development of the district. As such it is considered prudent to acknowledge some of the key draft policies contained within the draft plan, which may be relevant to this proposal. These include the following:

- Draft Policy S1: Spatial Strategy
- Draft Policy S2: Settlement Hierarchy
- Draft Policy NBE1: Development in the Countryside
- Draft Policy NBE11: Gaps Between Settlements
- Draft Policy DES1: Well Designed Places
- Draft Policy DGC2: Sustainable Transport
- Draft Policy H1: Housing Strategy
- Draft Policy H2: Housing Mix and Type
- Draft Policy H3: Affordable Housing
- Draft Development Management Policies (DM1 – DM24)
- Draft Policies Maps (showing revised settlement policy boundaries)



- 6.31 Whilst it is prudent to note the emerging policies contained within the draft Local Plan, it is acknowledged that these carry limited weight in decision making at this time. The policies that are most relevant to this application are contained within the suite of adopted policy documents as listed in paragraph 6.21 above. The policies considered most relevant to this development proposal include:

Core Strategy Policies (Local Plan Part 1) (adopted June 2014)

- Policy CP1 – Presumption in favour of sustainable development
- Policy CP2 - Spatial Strategy
- Policy CP10 – Spatial strategy for housing
- Policy CP11 – Housing tenure, type and mix
- Policy CP13 – Affordable housing on residential development sites
- Policy CP18 – Provision of open space, sport and recreation and built facilities.
- Policy CP19 – Development in the countryside
- Policy CP20 – Landscape
- Policy CP21 – Biodiversity
- Policy CP24 – Sustainable construction
- Policy CP25 – Flood risk
- Policy CP26 – Water resources / water quality
- Policy CP27 – Pollution
- Policy CP28 – Green Infrastructure
- Policy CP29 – Design
- Policy CP31 – Transport
- Policy CP32 – Infrastructure

Medstead and Four Marks Neighbourhood Plan (made, May 2016)

- Policy 1: A Spatial Plan for the Parish
- Policy 7: Local Green Spaces (vii – Stoney Lane Strip)
- Policy 10: Green Infrastructure and Biodiversity
- Policy 11: Sustainable Drainage Systems
- Policies Map Inset 2: South Medstead

- 6.32 The following section of this statement will demonstrate how the proposals comply with relevant policies of the adopted plan, and therefore why the proposal should be considered by the Council for approval.



7.0 Summary of Key Planning Considerations

Principle of Development

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise. The adopted development plan for East Hampshire comprises: The Joint Core Strategy (2014), The Housing and Employment Allocations Plan (2016), Saved Policies (2006), and The Medstead and Four Marks Neighbourhood Plan (2016).
- 7.2 Policy CP2 of the adopted Joint Core Strategy (2014) sets out the spatial strategy for development in the district. CP2 states that new development will be directed to the most sustainable and accessible locations in the district in accordance with the spatial strategy, and by making the best use of previously developed land.
- 7.3 Four Marks and South Medstead are defined in the settlement hierarchy as 'Small Local Service Centres' (Level 3 out of 5), meaning they have a limited range of services, but includes suitable locations to accommodate some new development. Level 3 settlements such as Four Marks and South Medstead will be maintained to ensure they provide basic grocery shopping supported by a range of other shops, non-retail services and community uses. Paragraph 4.8 of the Joint Core Strategy notes that in Level 3 settlements '*modest development to meet local needs for housing [...] will secure their continuing vitality and ensure thriving communities*'.
- 7.4 The application site is located outside of (but adjacent to) the defined settlement policy boundary as defined within the Joint Core Strategy Policies Maps (Map 6) and within the Medstead and Four Marks Neighbourhood Plan (2016). Whilst the site is located outside the settlement boundary of Medstead (and therefore located within the countryside as per Policy CP19); the eastern boundary of the site (Beechlands Road) is contiguous with the defined boundary, demonstrating that the site is closely connected to existing built form.
- 7.5 Proposed settlement boundary amendments (as shown within the draft Regulation 18 Policies Maps) seek to extend the settlement policy boundary in this location to include an existing property to the south-east corner of the site ('Penillee') as well as a row of existing houses to the north of the site along Five Ash Road. If the proposed changes are adopted as part of the emerging Local Plan, the site will adjoin defined settlement boundaries along its eastern and northern boundaries, demonstrating that the site is well related to the existing built-up nature of Medstead and therefore appropriately located for development.
- 7.6 Adopted Policy CP10 (part 4) of the 2014 Joint Core Strategy seeks to direct the identified local housing need through '*the allocation of sites at the most sustainable settlements to provide [...] a minimum of 175 dwellings at both Liphook and Four Marks/South Medstead*'. To address this need, the Housing and Employment Allocations document (2016) allocated three greenfield sites in Four Marks/South



- Medstead for residential development, all of which have now been built-out and occupied. The allocation and successful delivery of these sites suggests that South Medstead is a suitable and sustainable location to accommodate future growth within the district and is a location that is desirable for people to want to live.
- 7.7 Whilst it is acknowledged that the application site is not currently allocated for development and is located outside the defined settlement boundary (and therefore within the countryside), given the adopted Joint Core Strategy is now well over 5 years old (having been adopted in 2014), the policies that are most important for determining this application (including Policies CP10 and CP19) no longer carry full weight.
- 7.8 In a recent change to national planning policy, paragraph 226 of the December 2023 update to the NPPF, allows local planning authorities which have an emerging local plan in place to identify and update annually a supply of sites to provide a minimum of four years' worth of housing against the 5-year housing requirement.
- 7.9 The Council's latest published housing supply position (February 2024) identifies that a 4.74 year housing land supply can be demonstrated, calculated against the 5-year requirement. In line with NPPF paragraph 226, the Council claims to be a 'four year' authority owing to the publication of a Regulation 18 consultation document in September 2019 which included proposed allocations and a policies map. As such, the Council contends that it can demonstrate a 4-year supply of housing and is therefore immune from the application of the tilted balance (NPPF para 11d).
- 7.10 However, in a recent appeal decision dated 10 April 2024 for a proposed development of 60 dwellings at Mount Royal, Four Marks (APP/M1710/W/23/3329928) the Inspector concluded in paragraph 63 that the Council's housing land supply was 3.59 years, and that the Council is unable to demonstrate a four-year housing land supply (paragraph 70). Owing to this, the Inspector concluded that the provisions of paragraph 11d of the Framework are triggered (i.e. the 'tilted balance'), and on this basis it was determined that the adverse impacts of the development did not outweigh the benefits, and the appeal was allowed. In a recently published Committee Report for a separate development proposal in Four Marks (Council reference: 60062, dated 08 May 2024); Officer's acknowledge the Mount Royal appeal decision and the conclusion of the Inspector that the district can only demonstrate a 3.59 year housing supply, leading to the engagement of the tilted balance.
- 7.11 Given how recent the Mount Royal appeal decision is, it is clear the Council does not have a four-year housing land supply, and this is not contended by the Council. The Housing Land Supply Assessment (prepared by Pegasus) that has been submitted in support of this application further ratifies this by concluding that the current housing supply in East Hampshire is 3.47 years. In light of this, it is judged that the presumption in favour of sustainable development applies in the case of the proposed development; and whilst the proposal would conflict with the provisions of Policies CP10 and CP19 of the Core Strategy, the failure to demonstrate a 4-



- year supply of housing land and the subsequent application of the tilted balance of NPPF paragraph 11d leads to the conclusion that the principle of residential development on this site is acceptable.
- 7.12 The lack of a 4 and 5-year housing land supply, as directed by footnote 8 of the NPPF, also renders policies CP10 and CP19, as well as other policies which relate to housing provision, out of date, and hence any conflict with those policies is of lesser weight in the planning balance.
- 7.13 It is also of note that given the Medstead Neighbourhood Plan is over 5 years old (having been made in May 2016), the protections afforded by Paragraph 14 of the NPPF are not applicable in this case.

Site Location / Sustainability

- 7.14 Whilst the site is located outside a formally designated settlement boundary, it adjoins the Medstead settlement policy boundary to its east, which demonstrates the site is closely linked to existing built form and is not isolated in the countryside. In addition, the proposed extensions to the settlement boundary in this location (as shown with the draft Policies Maps to support the Regulation 18 draft local plan) demonstrates the Council's view that the existing built form and urban character of development towards the south-east of the site, and towards the north along Five Ash Road to be appropriate for inclusion within the settlement boundary. As such it is considered that the site is ideally positioned to provide additional suitably located growth.
- 7.15 The site is located within the Medstead Parish but is approximately 600m to the north of the larger settlement of Four Marks, and many day-to-day facilities are located within 1.6km of the site. Both South Medstead and Four Marks are classified in the Joint Core Strategy as 'Level 3' settlements (Small Local Service Centres) which are described as being suitable locations to accommodate new development (JCS, paragraph 4.8). Draft Policy S2 of the emerging (Reg 18) Local Plan classifies Four Marks as a 'Tier 3' settlement, which is described in paragraph 3.38 of the Regulation 18 Local Plan document as being '*sustainable locations*' which are '*focal points for the surrounding villages and rural areas in terms of the provision of local services and facilities*'.
- 7.16 In allowing permission for a 51-unit development on land to the immediate south-east of the application site (Mulberry Gardens, APP/M1710/A/14/2225146, 2014), the Inspector concluded that subject to improvements to public footpaths at Boyneswood Lane and Stoney Lane which have now been implemented, the development would enable acceptable pedestrian and cycle access to Four Marks Primary School, and would be compliant with Policy CP31 of the Local Plan. The appeal decision went onto conclude that the development can be absorbed successfully into Four Marks, and the appeal was allowed. The proximity of this appeal site to the current application site demonstrates that the site is equally as



sustainably located, and the scale of development proposed can be absorbed sufficiently.

- 7.17 As such, in accordance with the Council's current and emerging settlement hierarchy, the sites proximity to the settlement of Four Marks indicates that it is sustainably located in terms of access to existing facilities and services and constitutes sustainable development.

Access and Highways

- 7.18 In support of the application, a Transport Assessment (TA) has been undertaken by i-Transport which has been developed in discussion with Hampshire County Council and considers the transport impacts that may arise from the proposed development, as well as the relevant transport and planning policy. A Framework Travel Plan (TP) has also been produced, which contains a comprehensive package of active and sustainable transport measures.

- 7.19 The TA concludes that the development proposal is in an accessible location in transport terms and will make the best use of sustainable transport opportunities. The TA confirms that the proposal will have an acceptable impact on the operation of the local highway network, and that it complies with relevant national and local transport policy.

- 7.20 The proposed development seeks detailed permission for access to the site, and the TA demonstrates that access arrangements comply fully with the latest design guidance to deliver safe access for all users in accordance with NPPF paragraph 114. Access to the site is proposed via a new priority-controlled junction onto Beechlands Road with associated footways either side. Additional pedestrian/cycle connections (3.0m wide) will be provided to link the site to Boyneswood Lane to the south, and to Stoney Lane to the west. The proposed access has been subject to an independent Stage 1 Road Safety Audit which concludes that the arrangements will be safe and suitable.

- 7.21 The details presented in the TA and associated plans (including the submitted Proposed Access Arrangement Plan ITB13450-GA-002 Rev G) demonstrate that the proposed development is sustainably located in transport terms and would not have an unacceptable impact on highways safety or capacity in accordance with NPPF paragraph 115.

- 7.22 As per the requirements of NPPF paragraph 117, given the development is likely to generate additional movements and travel demand, a Travel Plan has been prepared which demonstrates Bargate Homes' commitment to sustainable travel. The Travel Plan sets out a sustainable transport strategy for the development and its future residents with the aim of reducing single occupancy car journeys and to improve the accessibility of the site by non-car modes of transport. Measures set out within the Travel Plan to achieve these aims include:

- The appointment of a Travel Plan Coordinator to promote the Travel Plan amongst residents.



- Offer of a Sustainable Travel Voucher to each dwelling worth £50 to be used towards the cost of a sustainable travel measure (such as a bus pass, cycle equipment etc)
- Secure cycle parking provision within the curtilage of each new dwelling
- EV charging infrastructure at each dwelling.
- Personalised Travel Planning – individual and focused travel planning advise to all new households to raise awareness of the options available.
- Travel Information Pack and Guide to be provided to all new households (to include bus timetables, maps etc)

7.23 In summary, the submitted TA and Travel Plan together demonstrate that the site is sustainably located and will achieve safe and convenient access for all users, including suitable links for pedestrians and cyclists. The proposed development will therefore be in full accordance with the provisions of Policy CP31 of the Local Plan, as well as the provisions set out in Chapter 9 of the NPPF.

Landscape, Trees and Open Space

7.24 A Landscape and Visual Appraisal (LVA) has been undertaken by SLR Consulting Limited to accompany the Outline application. Finding within the LVIA are based on the Illustrative Site Masterplan [IMP-01 Rev P2] and the Illustrative Landscape Masterplan [MR-23]. The masterplan has been designed to reduce landscape and visual effects and to provide mitigation that is appropriate in the local context.

7.25 The site is not located within any formal landscape, heritage or ecological designations. The closest notable landscape designations include the South Downs National Park (approx. 940m to the south-east), numerous public rights of way (PROWs), National Cycle Route 224 (approx. 100m to the north), and various ancient woodlands with the key one being Chawton Park Wood (approx. 500m to the north-east). The site is not considered to be a “valued landscape” for the purposes of NPPF paragraph 180 (a).

7.26 A Local Gap designation which is confirmed in Policy 2 of the Medstead and Four Marks Neighbourhood Plan (2016) and proposed within the emerging (Regulation 18) Local Plan (draft policy NEB11) is located around 90m to the north of the site to the north of Five Ash Road.

7.27 The site is proposed to remain outside of (but adjoining) the current and emerging settlement policy boundary. The site comprises two small-scale, grassland fields located close to the settlement of Four Marks. The boundaries of the site are primarily formed by well-established hedgerows and trees, which vary in condition.

7.28 To facilitate the development, 2no. Category C trees (T4 and T5, both Hawthorn) and 2no. small sections of Category C hedgerow (H1 Hawthorn and H6 Mixed species) are proposed to be removed. The removal of these Category C trees, and small sections of hedgerow is minor in the context of the wider site, and the



- additional panting proposed as part of the landscaping scheme will more than compensate for this loss and will contribute to maintaining the local verdant character. No Category A or B trees are required to be removed, and standard tree protection measures will be observed during the construction phase.
- 7.29 The site is classified as Landscape Character Area (LCA) 2B: “Four Marks Clay Plateau” in the East Hampshire Landscape Character Assessment (July 2006). The application site and its context largely align with the descriptions given for this character area, with the exception being that the description does not entirely reflect the level of urban influence experienced within the site and its immediate context due to the site’s positioning close to the settlement of Four Marks.
- 7.30 The landscape appraisal concluded that any negative landscape effects resulting from the proposed development would be highly localised, owing to the proximity of the site to existing built form, the undulating landform and the extent of well-established vegetation which largely contains the proposed development. Any effects would reduce overtime as the proposed vegetation establishes and filters views of the proposed development.
- 7.31 All identified effects to the site itself have been assessed as being no greater than minor and negative. Landscape effects on the wider landscape have also been assessed as minor and negative as the landscape is already influenced by existing settlements and nearby urban influences. There would also be no landscape effects on the South Downs National Park.
- 7.32 Several measures have been designed into the site to ensure that the development responds well to the site’s context and character; and that landscape and visual effects are minimised to result in an attractive and desirable development. These measures include:
- Retention of the vast majority of existing native hedgerows and trees along the site’s boundaries, and enhancement where appropriate;
 - Inclusion of new street trees and ornamental planting throughout the development;
 - Inclusion of public open space at the entrance to the site, comprising a play area (with provision for younger children and teenagers), benches, pedestrian route, native planting and informal amenity space;
 - Another area of public open space to the north-western corner to provide informal amenity space comprising native planting and benches, and a connection to the adjacent bridleway;
 - Setting back development from Boyneswood Lane to maintain its rural character.
- 7.33 Chapter 12 of the NPPF seeks the development of high quality, beautiful places with Paragraph 135 requiring developments to be visually attractive, to have effective landscaping, and to be sympathetic to the surrounding built environment and landscape setting. Policy CP20 of the Local Plan states that *‘the special*



character of the district's natural environment will be conserved and enhanced', and that new development will be required to 'incorporate appropriate new planting to enhance the landscape setting of the new development [to include] native species to enhances biodiversity'. The submitted LVIA and associated landscape masterplan demonstrates that this development can deliver a well-considered residential scheme that sits appropriately in its setting and will avoid any significant effects on landscape character or sensitive landscape designations. As such, the development is considered to accord with the provisions of the NPPF, and the provisions of Policies CP18 and CP20 of the Local Plan.

Ecology and Biodiversity Net Gain (BNG)

- 7.34 An Ecological Impact Assessment (EclA, prepares by LC Ecological Services) has been submitted as part of this application to assess the ecological baseline, and potential ecological impacts and effects of the proposed residential development of this site. Preliminary ecological appraisals and relevant species surveys have been undertaken on site between 2018 and 2024, and a suite of updated surveys are currently being undertaken to update the results where necessary.
- 7.35 The EclA has identified 25 Important Ecological Features which have potential for impact as a result of the development proposal. Owing to the nature of the scheme, the assessment identifies that the development (without mitigation) will result in a loss of grassland habitat and a net loss in biodiversity value.
- 7.36 To compensate for this loss, the EclA proposes a suite of on-site mitigation and enhancement measures, as well as securing off-site compensation solutions to deliver an overall biodiversity net gain of at least 10% (as required by national legislation), as well as opportunities to prevent and minimise the risk of adverse ecological effects to an appropriate level.
- 7.37 The mitigation and enhancement measures proposed are detailed in Sections 7 and 8 of the EclA, and include the following measures:
- the implementation of a biodiversity construction management plan (CEMP) during the construction phase,
 - retention of existing native hedgerows and trees on site and species-rich enhancement where necessary,
 - removal of non-native woody species,
 - crown lifting to enable more light penetration at ground level,
 - hedgerow maintenance to enhance wildlife connectivity,
 - inclusion of buffers of enhanced neutral grassland/wildflower,
 - inclusion of 2no. bee bricks and hedgehog friendly gravel boards to each new dwelling,
 - inclusion of log piles and hibernacula for reptiles, invertebrates and small mammals,
 - additional ornamental planting and tree planting throughout the site.



- 7.38 Bargate Homes are committed to ensuring this development secures at least a 10% gain in biodiversity value post-development (as required by legislation). This will be achieved through a combination of the aforementioned on-site enhancements, as well as through off-site credits which Bargate Homes are actively exploring in order to secure maximum biodiversity benefit for the site. The development therefore accords with the provisions of Policy CP21 (Biodiversity) and CP28 (Green Infrastructure) of the Joint Core Strategy; Policy 10 (Green Infrastructure & Biodiversity) of the Medstead and Four Marks Neighbourhood Plan; and Section 15 of the NPPF including paragraph 180(d) which requires developments to show a measurable net gain in biodiversity value.

Flood Risk and Drainage

- 7.39 A Flood Risk Assessment (FRA) has been undertaken by The Civil Engineering Practice and accompanies this application. The FRA identifies the site as being located within Flood Zone 1. The FRA concludes that the site is not at risk of flooding from tidal or fluvial sources or groundwater and is not a significant risk of flooding from overland flows. In terms of flood risk the proposed development is suitable at this location.
- 7.40 A Preliminary Drainage Strategy Plan and Calculations is detailed within the report at Appendix 7. The proposed development will incorporate a sustainable drainage system which will discharge surface water by infiltration to the ground, with water storage provided for 1:100 year rainfall events with an allowance for climate change. Foul water will be discharged via a pumping station to the existing foul sewer located to the south of the site beneath Boyneswood Lane.

Heritage and Archaeology

- 7.41 SLR Consulting Limited has prepared a Desk-based Archaeology Assessment of the site and surroundings to assess the impact of the proposed development on heritage assets against the provisions of section 16 of the NPPF and the Planning (Listed Building and Conservation Areas) Act 1990, as well as relevant local policies. The assessment was informed by site visits and detailed desk top analysis of the local historical record.
- 7.42 There are 4no. Grade II listed buildings and 13no. non-designated assets within 1km of the site, none of which lie within the site boundary. In addition, there are no known past archaeological events on or within the vicinity of the site.
- 7.43 In terms of beneath ground (archaeological) potential, it is concluded that the site has a *low* potential to contain finds and features from the prehistoric, medieval and post-medieval periods and a *negligible* potential to contain finds and features from the Roman, Anglo-Saxon and modern periods. As such, archaeology is not considered to preclude or constrain the developability of the site. On the basis of



the available evidence, no requirement for further archaeological investigation is anticipated to inform the determination of planning consent.

- 7.44 Overall, the proposal is highly unlikely to have a significant or less than significant effect on the local historic environment, including archaeological findings and designated historic assets. The proposed development is therefore considered to be consistent with the provisions of Chapter 16 of the NPPF, and Policy CP30 of the Local Plan.

Noise

- 7.45 A Noise Impact Assessment has been prepared by SLR Consulting Limited, which confirms that the main source of noise affecting the proposed development is likely to be road traffic. It is noted that plant noise from a joinery unit (Ross Langley Bespoke Furniture and Joinery) located to the west of the site was slightly audible at the western site boundary.
- 7.46 The ProPG Stage 1 Assessment has categorised the worst case of the development's noise environment as 'low risk' on future occupants, with much of the site falling into 'negligible risk'. A ProPG Stage 2 Full Assessment has been undertaken and design specifications have been established to ensure that internal noise levels inside habitable rooms fall within guideline limits recommended in ProPG, BS8233: 2014 and WHO Guidelines.
- 7.47 The majority of the external garden area will achieve noise levels below the lower threshold for external amenity noise level guidance. Where these levels are not met, the provision of standard close-boarded garden fencing to amenity areas will reduce the noise levels to within the lower guideline threshold, and the BS8233:2014 external amenity guidelines would be met for the proposed development.
- 7.48 Full noise calculations and results are detailed in the submitted Noise Impact Assessment report. The report concludes that there are no issues relating to noise that cannot be successfully managed by appropriate mitigation (to be secured by condition) to avoid any undue impact on residential amenity.

Lighting

- 7.49 An outline assessment prepared by Nulty Lighting provides an overview for lighting considerations in respect to potential amenity, landscape and ecological effects of the development resulting from increased lighting.
- 7.50 A detailed lighting scheme will be prepared based on the results of the outline assessment at Reserved Matters Stage and will incorporate measures to further reduce light spill, taking account of the principles of Responsible Outdoor Lighting at Night (ROLAN) and the recommendations of the ecological assessments.
- 7.51 The future detailed lighting scheme will need to be mindful of the ecology of the area in particular as this site is adjacent to the South Downs National Park Dark Sky Reserve. All lighting shall be designed to minimise light pollution with particular



attention to the sensitive nature of the site ecology, notably bat habitat. By minimising light spill, the impact on surrounding wildlife is mitigated.

- 7.52 The outline assessment provides general lighting guidelines for the development to ensure any additional lighting as a result of the proposal, does not conflict with any national or local planning policies.

Land Contamination

- 7.53 A Phase 1 Desk Study Report has been prepared by Geo-Environmental in relation to geotechnical and geo-environmental factors pertaining to the proposed development. This report includes a Preliminary Risk Assessment (PRA).

- 7.54 The PRA identified no potentially contaminative activities have occurred on the site, however plausible potential pollutant linkages do exist in relation to the historic contaminative activities being undertaken near the site. The overall risk of harm to end users is generally 'low' but further investigation and assessment is required to better support characterisation and calibration of the Conceptual Site Model (CSM) and where/ if necessary to determine a remedial strategy to reduce, removed or otherwise control any risk within the site to key receptors.

- 7.55 The PRA recommends that geochemical and geotechnical investigation be carried out on the site to include analysis of soil and groundwater (if encountered) samples for the range of potential contaminants identified within the Desk Study, together with ground gas monitoring and an assessment of the site's ground gas regime. It is considered that the undertaking and submission to the Council of this additional assessment can be secured appropriately by condition.

Planning Conditions

- 7.56 NPPF paragraph 56 confirms that planning conditions should be kept to a minimum and only imposed where necessary and relevant to planning and the proposed development. It goes on to confirm that conditions required to be discharged prior to commencement should be avoided unless there is clear justification. This application intentionally includes sufficient information to minimise the need for Outline conditions, with the view that site specific design details will be proposed for the Council's approval at Reserved Matters stage.



8.0 Affordable Housing Statement

- 8.1 In accordance with emerging policy (draft policy H3) as well as with adopted Policy CP13 of the Core Strategy; developments of 10 units or more are required to provide 40% on-site affordable housing (at a 70:30 split between social rented and intermediate housing). Despite the Government's introduction of the First Homes product in 2021 (which should make up 25% of the total affordable provisions), emerging Policy H3 of the draft (Regulation 18) Local Plan does not propose to include a requirement for sites in East Hampshire to deliver this product (paragraph 9.59).
- 8.2 The proposed development is submitted in Outline for a scheme of 'up to' 70 dwellings, therefore the precise number of dwellings proposed is yet to be established. Notwithstanding this, it is proposed that a policy compliant 40% of the number of dwellings delivered would be offered as affordable housing, delivered at a policy compliant tenure split to meet identified local needs. The affordable units would be delivered and managed by VIVID who are the parent company of Bargate Homes, and the provision would be secured in a s106 agreement.
- 8.3 The affordable housing will be delivered on site and will be located in appropriate clusters within the site to enable the practical management of the units, but also to ensure they are fully integrated into the development and designed to be indistinguishable from the market units as per the requirements of Policy CP13.
- 8.4 The indicative mix of units within the site is shown in the table below. To note the mix shown is illustrative at this stage in order to demonstrate that the site is capable of delivering the quantum, type and mix of dwellings proposed.

Unit Type	% Market Units	% Affordable Units
1-bed Maisonette	0%	22%
2-bed Maisonette	0%	0%
2-bed House	14%	43%
2-bed Bungalow	5%	0%
3-bed House	54%	35%
4-bed House	27%	0%
TOTAL	60%	40%

Table 2: Housing Mix

- 8.5 Policy CP11 of the Core Strategy seeks for developments to include a range of dwelling tenures, types and sizes to meet local housing needs. Draft Policy H2 of the Regulation 18 Local Plan specifies a similar requirement. The January 2024



- Housing Background Paper that was produced in support of the Regulation 18 draft local plan consultation, notes that evidence supports the need for smaller homes with the largest share of demand for new market homes coming from households needing 2 and 3 bedroom homes. For affordable rent, the biggest demand is for 1 and 2 bedroom homes.
- 8.6 The indicative mix shown in the table above accords with the evidence outlined in the Housing Background Paper, by providing for a majority 2 and 3-bedroom market units, and a majority 1 and 2-bedroom affordable units.
- 8.7 The provision within the proposed development of a range of 1, 2, 3 and 4 bedroom homes, which include a mix of houses, maisonettes and bungalows; demonstrates that the site will deliver the type of housing that has been identified as needed in the local area, which is a benefit of considerable weight in the overall balance. In allowing the recent appeal at Mount Royal in Four Marks (APP/M1710//23/3329928) the Inspector concluded at paragraphs 75 and 76 that the 40% affordable housing proposed on site was a *'significant proportion'* and would have *'substantial economic and social benefits'*. The same conclusion and weighting to the provision of affordable housing at the application site should therefore be made.
- 8.8 The 2024 Housing Background Paper also highlights the need for new housing to be adaptable for older people or people living with disabilities, and the requirement for both market and affordable housing to meet the requirement for accessible and adaptable homes of Part M4(2) of the Building Regulations. The Paper also encourages the provision of affordable housing that meets the requirements of Part M4(3) of the Building Regulations. These requirements are reflected in draft Policies H2 and H3 of the Regulation 18 Local Plan. The provision of such units within the site will be determined at reserved matters stage when the detailed design of the development is known.



9.0 Sustainability Statement

- 9.1 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development (paragraph 11), and the Framework seeks for sustainable development to be pursued in a positive way. Paragraph 7 of the NPPF states that there are three dimensions to sustainable development; economic, social and environmental. This statement addresses these elements in turn, as well as outlining the energy saving measures the development proposed to include in order to reduce the development's impact on climate change. Further detail of the energy efficiency measures to be incorporated can be provided at detailed design stage via RM applications and conditions, as well as through Building Regulations requirements.
- 9.2 The technical assessments that have been summarised in the preceding sections of this report demonstrate the sustainability of the site in terms of its location within the settlement hierarchy, its links to existing services and facilities, and its minimal impact on surrounding landscape, heritage and ecological features.
- 9.3 The Council's adopted climate change policy - policy CP24 (Sustainable Construction) is now out of date as it seeks compliance with the now rescinded Code for Sustainable Homes. Chapter 4 of the draft Local Plan (Regulation 18) contains a suite of policies that (whilst carry very limited weight at this stage) show a direction of travel towards requirements that seek for new developments to include measures that positively respond to the climate emergency.
- 9.4 The Council's SPD on Climate Change and Sustainable Construction (April 2022) is relevant in the determination of this application, and the sustainability checklist at Appendix 4 of the SPD has been completed and submitted as part of this submission.
- 9.5 The following sets out how the proposed development seeks to meet the three dimensions of sustainability as set out in the NPPF, as well as the specific on-site energy reduction measures that are proposed to be incorporated into the site design.

Economic Sustainability

- 9.6 The provision of new housing will generate New Homes Bonus payments to the Local Authority, as well as CIL receipts for the District and Parish Councils to help fund vital local infrastructure projects that are required to support the proposed development. In addition, the scheme will generate local job opportunities during the construction phase, as well as an injection of perpetual spending into the local economy from incoming residents. A development of up to 70 homes in this location will therefore have a demonstrable benefit to the local economy and will contribute to the aims of the NPPF to build a strong, responsive and competitive economy.

Social Sustainability

- 9.7 The provision of new housing in this location will help to contribute to the known undersupply of housing in the district and will increase the choice of available



market and affordable housing within the local area. The development will include the provision of new areas of open space, play provision, and links to the wider right of way networks in the vicinity which will be to the benefit of both future occupants and existing residents. The overall provision of a mix of new housing (including bungalows) and associated facilities leads to the conclusion that the development secures significant net gains within the social dimension of sustainability as set out in the NPPF.

Environmental Sustainability

- 9.8 Measures to protect and enhance the natural, built and historic environment are proposed to be embedded into the layout of the site and into the built fabric of the development. No heritage assets will be impacted by the development and given the proximity of the site to the existing settlement edge, coupled with the surrounding undulating landform and the landscape's well-established vegetation; visibility of the proposed development would be limited to the site's immediate context. A comprehensive scheme of planting to include native trees and hedgerows will be included to enhance and expand habitats and to bolster opportunities for biodiversity to thrive. As required by legislation, at least a 10% net gain in biodiversity value will be demonstrated (through both on and off site measures) to contribute to the environmental sustainability of the site.

Energy Efficiency Measures

- 9.9 A range of measures will be embedded into the design and function of each new home in order to significantly improve the energy efficiency and carbon footprint of the development as a whole. These measures will include:
- Air Source Heat Pumps
 - EV Charging points to each plot
 - Photovoltaic Panels (PV)
 - Thicker wall cavity.
 - Water butts to each plot.
- 9.10 By utilising a fabric first approach in the design and layout of the site, as well as installing energy saving measures included in the list above, it is expected that the development will result in a reduction in carbon emissions against the latest building regulations targets. This accords with the aspirations of the Council's emerging policies on climate change (including the draft policies contained within Chapter 4 of the Regulation 18 Local Plan) which strongly supports proposals that include measures to achieve zero-carbon development and positively contribute to addressing climate change.



10.0 Draft Head of Terms

10.1 Necessary financial contributions will be made through an appropriate Section 106 agreement in accordance with adopted policy where they are justified and meet the relevant tests. It is anticipated that planning obligations will be required for the following matters which will form the Heads of Terms of a future Legal Agreement:

- Affordable housing provision,
- Travel Plan monitoring including proportionate monitoring fee,
- Highways improvements
- Public Open Space and Play Provision

10.2 The proposal is located within the adopted CIL charging zone; therefore, a CIL Additional Information Form accompanies the submission.



11.0 Summary

- 11.1 At the heart of the NPPF is a presumption in favour of sustainable development. As set out in NPPF Paragraph 8, the planning system has three overarching objectives which are key to achieving sustainable development. These are social, economic and environmental objectives.
- 11.2 The proposed development would result in social benefits through:
- The provision of a mix of up to 70 dwellings in a sustainable location, to add to the much-needed housing stock in the district, representing a very substantial benefit in the context of the Council's housing supply and delivery position;
 - The provision of a policy compliant level of affordable housing units; as well as a suitable mix of tenures and houses sizes to accord with identified local needs representing a very substantial benefit in the context of the pressing need for housing and poor track record of delivering affordable homes;
 - Public open space provision including play provision for younger children and teenagers for the enjoyment of incoming and existing residents, as well as private outdoor amenity space for each dwelling; and
 - A sustainable location with access to a range of services and facilities, including Four Marks Primary School, and other shops and services in Four Marks.
- 11.3 The proposed development would result in economic benefits through:
- The generation of employment related to construction;
 - New Homes Bonus payments and CIL receipts;
 - Contributions to the local economy by future residents; and
 - Additional financial investment towards existing highways and open space infrastructure through planning obligations.
- 11.4 The proposed development would result in environmental benefits through:
- Existing mature planting along the boundaries to be retained and enhanced, in order to retain the verdant character of the site and to protect wider landscape views;
 - Provision of ecological enhancement measures, including mitigation measures to prevent harm to sensitive habitats and to achieve at least 10% Biodiversity Net Gain;
 - Protection from flooding for the lifetime of the development by utilising sustainable drainage systems which also provide ecological and landscape benefits;
 - Careful landscape design to produce a development of the highest quality, ensuring it respects the local area; and
 - Design of the homes to meet and exceed current environmental standards, including adopting a fabric first approach and the use of sustainable energy technologies including EV car charging at each dwelling.



- 11.5 It is therefore evident that the proposal would deliver multiple benefits, particularly the significant benefit of a mix of much needed affordable and market housing in a location that has been judged in previous appeal decisions to be sustainable and suited to additional residential redevelopment.
- 11.6 This statement has highlighted the significant benefits the proposal would offer and demonstrates that the proposed development would not result in any adverse impacts that cannot be mitigated to an acceptable level. Whilst the site is not allocated for development, the Council's proposed settlement boundary changes indicate that the surrounding area has already adopted a sub-urban character, and the site would be ideally suited to accommodate much needed additional housing.
- 11.7 The confirmation in the recent appeal at Mount Royal in Four Marks (APP/M1710/W/23/3329928) that the Council is only able to demonstrate a 3.59-year supply of housing (further ratified by the submitted HLS Assessment which calculated a 3.47 year supply) demonstrates the urgent need for housing to be delivered in the district. The development proposal for up to 70 homes makes the most effective use of the land available whilst creating a beautifully designed place for new residents to live.
- 11.8 Whilst in strict terms, the proposal would conflict with the provisions of Policies CP10 and CP19 of the Core Strategy, the Council's current inability to demonstrate a 4-year supply of housing land and the subsequent application of the tilted balance of NPPF paragraph 11d leads to the conclusion that the principle of residential development on this site is acceptable.
- 11.9 As this report has demonstrated, the benefits that would result from this development are significant, and there are no adverse impacts that would outweigh the delivery of these benefits. As such, having regard to the policies contained within EHDC adopted and emerging development plans, as well as direction from the NPPF and other material considerations identified; it is considered that the planning balance lies in favour of the proposal, and it is respectfully requested that planning permission is granted without delay.





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