



BINSTED PARISH COUNCIL

RESPONSE TO EHDC LOCAL PLAN REGULATION 18 (2024)¹

¹ Responses can be submitted through website: easthants.gov.uk/lp-consultation by email to: localplan@easthants.gov.uk or in writing to:
Planning Policy East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX.

1. Background

- 1.0 This document is submitted by Binsted Parish Council (BPC) in response to East Hampshire District Council's Local Plan 2021- 2040) Regulation 18 consultation (2024).
- 1.1 Binsted parish has a population of 1,900² and is a rural parish - amongst East Hampshire's largest. It covers 2,800 ha (7,000 acres), stretching 8 km west to east (Alton to Rowledge).
- 1.2 Binsted parish is split between two planning authorities. The South Downs National Park (SDNP) is our Lead Planning Authority, as most of the parish's land lies within the National Park.
- 1.3 The South Downs Local Plan³ is in the initial stages of review and its planned site allocations have not yet been announced. Any SDNP allocations for our parish will be **additional** to the allocations proposed in this EHDC Regulation 18 Local Plan consultation.
- 1.4 BPC recently consulted its parishioners about planning priorities, to prepare its Parish Priority Statement, which was submitted to SDNPA in October 2023⁴ This identified three priorities:
 - i. **Urgently address traffic problems across the whole parish** (road traffic volumes, speeds and safety, and the absence of both safe cycle tracks and bus transport.)
 - ii. **Preventing building on farmland and woodland and areas of existing high biodiversity.**
 - iii. **Exploring the potential to build on brownfield locations, such as farmyards.**

2. Our objections to EHDC's Regulation 18 Local Plan Consultation

- 2.1 BPC considers EHDC's draft Local Plan unsound. It is inconsistent with the National Planning Policy Framework (NPPF) and does not achieve the correct balance between development, environmental protection and public interest.
- 2.2 Section 3 below details our concern about the extreme disconnects between the stated desired outcomes of the proposed policies and the likely actual results of the proposed Plan. We have concern about all aspects of the proposed Plan: the spatial strategy; the Settlement Hierarchy and its application; and site allocation numbers.
- 2.3 Section 4 explains in detail our concerns about the impacts of the three proposed site allocations within Binsted parish, most particularly the selection of Alton as the SOLE Tier 1 Settlement and the proposal to locate EHDC's sole 'Strategic Site' in Binsted parish. We also have great concern about EHDC's proposal to promote Holt Pound to a Tier 3 Settlement. For all three sites, our concerns focus around three main issues:

i. Loss of greenfield land and negative impacts on nature and biodiversity:

All three large sites⁵ proposed *in our parish* would involve the sacrifice of greenfield land:

- Neatham Down (Site ALT8) is the sole 'Strategic Site' in EHDC's Plan and covers 97.9 ha of productive (Grade 3A) farmland which is also a "valued landscape."
- Lynch Hill (Site ALT 7) and Holt Pound (Site HOP 1) cover a further 13.2 ha of farmland.

² 2021 Census

³ Adopted 2 July 2019

⁴ <https://binstedparishcouncil.org.uk/wp-content/uploads/2023/11/Binsted-Parish-Priorities-Statement-vFinal2023.pdf>.

⁵ ALT8 Neatham Down, HOP1 Holt Pound and ALT7 Lynch Hill

Their development would come at a huge cost to biodiversity and nature, including to the River Wey and its chalk aquifer. It conflicts with EHDC's Policy NBE10 'Landscape', which puts a duty on EHDC to "respect and enhance the Local Plan Area's landscape assets." Greenfield sites also directly conflict with the government's 'Brownfield First' policy. There are better ways to create new homes - and affordable housing - that avoid the environmental harm caused by building on greenfield land. In our rural parish, Rural Exception sites could be used to build affordable housing on rural brownfield (farmyards, airfields, etc.) Around Alton, the Neatham site and other countryside without AONB/National Park designation could create a new 'Alton Greenbelt' (or green 'fingers') to link the town to the National Park. Potential opportunities also exist for local joined-up land management along the River Wey and BOA-17⁶, as described in Section 4.1.8. The UK Natural Capital Committee suggests that creating new wetland and woodland around towns are important opportunities.

ii. Pressure on local infrastructure:

The combined housing developments proposed *in our parish* (the 'Strategic Site' at Neatham Down and Site HOP-1 in Holt Pound) would **MORE THAN DOUBLE** our parish population, putting unacceptable pressure on all aspects of local infrastructure including roads, water supply, sewage treatment and health care, as well as fundamentally changing the rural character of the area.

In fact, the whole rationale of a 'Strategic Site' is to deliberately bring great change to an area. Such sites are planned new communities that are meant not to be mere housing estates but to 'deliver communities and to add value to the wider area'.

Strategic Sites are risky propositions: it is challenging to ensure the delivery of their infrastructure, as all basic services such as water, sewerage, roads, and health services must be provided from scratch. Successful Strategic Sites tend to be locations with good pre-existing road and rail infrastructure - often legacy from previous industrial use (for example, disused airfields, or disused mine workings) - which have spare road capacity to cope with influxes of new residents.

All new settlements require investments in infrastructure to be made by a range of bodies (Highways, private water companies, GP surgeries, etc). And even when funding for a Strategic Site's new infrastructure is secured (such as the highways upgrades at A32 & M27 J10 for Fareham's Welborne Garden Village⁷), the process of 'upgrading' infrastructure is very disruptive.

The sad reality is that many of these planned new communities fail, having "*been planned in the wrong locations, too far from town centres and rail stations, which therefore generate high levels of traffic and condemn their residents to car-dependent lifestyles. Funding for walking, cycling and public transport is often missing, so ... their reality is often completely at odds with the visions presented, worsening climate change and failing their residents.*"⁸

Neatham Down is NOT a sustainable location for a 'Strategic Site' and risks the failure described above. Walking, cycling and other car-free travel options are unfeasible. Local roads are already overcrowded. And it seems particularly perverse to clog up an A31 junction with new cross-town traffic, when A31 was originally built as a by-pass to keep traffic away from the town. And there is no sign that any outline commitments for infrastructure provision at Neatham have as yet, been made.

⁶ BOA-17: Biodiversity Opportunity Area #17 runs West-East: *Hawbridge-Malms-Isington-Bentley Station*

⁷ <https://www.local.gov.uk/case-studies/effective-delivery-strategic-sites-fareham>

⁸ <https://www.transportfornewhomes.org.uk/the-project/garden-villages-and-garden-towns/>

iii. Unreasonable housing allocation for Binsted parish

Parishes that lie mainly in the National Park generally expect their housing allocation to be *lower* than if the whole parish lay in EHDC. But even if Binsted parish lay entirely in EHDC's area, the housing allocation it would expect would be a fraction of the 1,019+ houses that EHDC proposes in Binsted in the Plan - and of course Binsted parish will also have to accommodate ad-hoc infill developments, PLUS further potential development sites yet to be proposed by SDNP's Local Plan. Shoe-horning East Hampshire's entire housing "need" into the parts of our parish that lie outside SDNP's boundary undermines Binsted's sustainability and harms the countryside setting of the National Park.

2.4 EHDC has failed to adequately engage with our local community.

EHDC has fallen short of standards set out in NPPF Policy (3) para 16 (2019⁹) which states that -
"plans should: ... (c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, infrastructure providers and operators and statutory consultees.

Planning Authorities

"are encouraged to 'front load' consultation with the public, from the earliest stages of each document's development, so that communities have the fullest opportunity to participate in plan making and to make a difference"

and to use Statements of Community Involvement (SCI) to describe how they will do this. EHDC's SCI covers only the statutory minima to which Planning Authorities must conform for Local Plan production.

EHDC's claim to want to hear residents' views about sites *proposed* in its Draft Plan seems hollow:

- i. EHDC's proposed Plan effectively annexes 107 ha of Binsted parish (4% of the parish's land area), making it a suburb of Alton. It therefore seems extraordinary that EHDC did not communicate with BPC (in whose parish Neatham Down lies) when it informed Alton Neighbourhood Plan's Steering Group about the site in October 2023, or subsequently.*
- ii. EHDC's proposed Plan contains NO mention of Binsted Parish and ALT-8 is misleadingly labelled and described as an Alton site, with no mention that Neatham Down lies in Binsted parish.*
- iii. If ALT-8 went ahead, a re-drawing of Alton settlement boundary seems likely to follow. A change in settlement boundary would have significant consequences: removing Neatham residents would reduce Binsted parish's Precept; Neatham residents would pay increased council taxes.¹⁰*
- iv. The term 'Strategic Site', in planning parlance, has a specific meaning¹¹. This should have been explained in layman's terms in the consultation, at least in response to questions at EHDC's January 'consultation' Zoom briefing for Parish Councils. EHDC's 2024 paper on 'Settlement Boundary Review' omits to mention that Strategic Sites 'trump' the concept of Settlement Boundaries. Also, many parishioners are unaware of the scale of the proposed development - they imagine Neatham would be the size of a 'normal' housing estate.*

⁹ We recognise that the NPPF was amended (in 2021 and 2023) but the relevant paragraph 16 remains.

¹⁰ Alton Town Council tax being higher than Binsted Parish Council's.

¹¹ <https://www.local.gov.uk/publications/effective-delivery-strategic-sites-accessible-version#introduction>

- v. The Alton Neighbourhood Plan Steering Group (ANPSG) is concerned that EHDC’s directions to allocate up to 700 homes for the Neighbourhood Plan does not work for Alton alongside the new ALT-8 “Strategic Site” allocated by EHDC. ANPSG believes that creating a car-dependent community of up to 1,250 homes on the outskirts of Alton would thwart its plans for active travel, and the net result would just be more housing for Alton with little or no supporting infrastructure. The ANPSG is also concerned that EHDC’s actions have posed a threat to the “integrity and freedom” of the neighbourhood plan process.

3. Our objections regarding EHDC’s overall strategy

3.1 It is BPC’s view that the current draft Plan, if taken forward, would fail at examination. Many of EHDC Plan’s policies are admirably aspirational but are not deliverable. Examples: the proposal to implement the spatial strategy by siting a ‘new village’ in a constrained location; the unjustifiably high quantity of development sought; and the flawed distribution of proposed sites across the settlement hierarchy.

3.2 EHDC’s stated priority of focusing growth in existing Higher Tier Settlements would not be achieved by the ‘Strategic Site’ at Neatham Down, which in reality would create a new settlement that has no meaningful attachment to the existing town of Alton.

3.3 EHDC’s proposal that Alton (newly combined with Holybourne) becomes the sole Tier 1 Settlement in the Revised Settlement Hierarchy is unsound. Comparative population figures should take account of building already in progress, rather than being based solely on 2021 Census. As Whitehill & Bordon’s population will soon exceed that of Alton & Holybourne (per Table A), it seems inappropriate to demote Whitehill & Bordon, and to expect Alton to shoulder a higher housing allocation.

Table A: Comparative populations	2021 Census population	Additional residents from existing planning permission	Population, prior to EHDC proposed new Local Plan developments
Alton	19,400	1,682 (= 701 houses x 2.4 residents/house ¹²)	21,082
Whitehill & Bordon	17,600	5,760 (= 2,400 houses x 2.4 residents/house)	23,360

3.4 EHDC’s proposal to promote Holt Pound to a Tier 3 Settlement is unsound. It should remain Tier 4.

3.4.1 We oppose Holt Pound’s promotion to a Tier 3 Settlement, which EHDC claims is justified “due to its perceived proximity to Waverley services” and resultant high accessibility score.

3.4.2 Holt Pound is a small hamlet with just over 100 dwellings. It has no services other than a pub on the A325, a car garage and Stables. *The accessibility score attributed to Holt Pound by EHDC is incorrect. Other than limited facilities in Rowledge, Waverley services described are not nearby and are not easily reached by foot or bicycle as implied by the accessibility score. The A325 is not considered a safe cycling route with narrow lanes, heavy traffic and 40-50mph speed limits. BPC proposed that cycle lane provision should be introduced as part of the current Belway Homes development on ‘Land West of Fullers Road’, but this was rejected by EHDC Planners.*

3.4.3 Holt Pound certainly does not act as “a focal point for surrounding villages and rural areas in terms of the provision of local services and facilities” which is typical of a Tier 3 Settlement. We consider it should return to Tier 4. It is inappropriate to place Holt Pound on a par with East Hampshire’s other Tier 3 locations – namely: Bentley, Clanfield, Four Marks, Grayshott, Headley and Rowlands Castle.

¹² 2.4 residents is the UK’s average household size (2021 Census.)

3.4.4 EHDC’s Revised Settlement Hierarchy Background Paper 2024 states that settlement populations have been considered, but Holt Pound clearly stands out as being much smaller than any of the other Tier 3 Settlements:

Tier 3 Settlements	Population*
Bentley	1,400
Clanfield	5,900
Four Marks	5,600
Grayshott	2,800
Headley	1,500
Holt Pound	<350
Rowlands Castle	3,200

* Using figures from the Revised Settlement Hierarchy Background Paper 2024 or ONS Census data where they were not included.

3.4.5 Holt Pound is of a comparative / even smaller size when compared to settlements in Tiers 4 and 5. For example: Medstead (Tier 4) has a population of 900; Ropley (Tier 4) has a population of 310; Beech (Tier 5) has a population of 460.

3.5 Insufficient evidence for the proposed distribution of development across the Settlement Hierarchy:

EHDC’s proposed Policy S2 (Settlement Hierarchy) reflects the view that settlements that offer more opportunities for people to access services and facilities on foot or cycle should be preferred as locations for new development.”¹³ Consequently EHDC’s ‘Revised Settlement Hierarchy’ Background Paper ¹⁴ incorporates the Accessibility Study undertaken by EHDC’s Transport Consultants ‘Ridge and Partners’ to identify which locations in East Hampshire best enable residents to reach key facilities within a 10-minute walk or cycle. Horndean and other southern settlements, as well as Liphook and Whitehill & Bordon, all achieved higher accessibility scores than Alton and Holybourne.

In spite of this, EHDC’s Southern and Northeast regions have been allocated a surprisingly small percentage of the proposed new homes¹⁵. Neatham Down scores very badly in the Accessibility Study – but curiously, this is not discussed in EHDC’s Paper, and its score is excluded from the paper’s discussion of Accessibility Study results for Alton and Holybourne.

3.6 We would have expected Hampshire Highways to be a proactive planning partner from the outset,

given Hampshire citizens’ widespread concerns about traffic issues. We are concerned at the lack of evidence in the transport study to assess how the overall quantity of development would impact the highways network, and the absence of settlement-specific mitigation requirements (except for some high-level work on requirements for sites at Whitehill/Bordon). It is worrying that no transport impact/capacity work has been undertaken as part of the selection of the sole strategic site.

3.7 The Plan fails to present credible evidence in respect of site allocation numbers,

as no capacity testing has been undertaken. Numbers given for the Neatham Down site seem chosen purely to qualify it as a ‘Strategic Site’. Across all the Plan’s sites, landowners promoting the sites seek higher numbers than the ‘indicative’ numbers shown in the Plan. As site allocation figures cannot be relied upon, it is difficult to evidence the need for a large strategic site.

3.8 There seems no justification for including a 22% buffer above the 9,082 new homes figure that EHDC calculates it needs to meet its central government target (after absorbing the SDNP shortfall). Ad-hoc infill proposals coming

¹³ https://easthants.moderngov.co.uk/documents/s24099/OUR%20LOCAL%20PLAN%202021%20-%2020240_FINAL_Part8.pdf

¹⁴ <https://www.easthants.gov.uk/sites/default/files/2024-01/Revised%20settlement%20hierarchy.pdf>

¹⁵The proposed Plan’s housing allocations fall into the following regional areas:

- North*:** Upwards of 1,519 new houses plus 8 Travellers sites. (* Alton, Four Marks, Ropley, Medstead, Bentworth, Bentley and the western area of Binsted parish which lies within EHDC.)
- Northeast**:** 864 new houses plus 6 Travellers sites. (**Area includes Bordon & Whitehill, Liphook, Grayshott, Headley Down and Holt Pound.)
- South***:** 688 new houses with no Travellers sites. (***)Area includes Horndean, Clanfield, Rowlands Castle, Catherington and Lovedean.)

forward surely form a further 'buffer' above the planned allocations? We acknowledge that NPPF rules allow plan requirements that are above the minimum figure. Even erring on the side of caution, we feel that a 10% buffer would be ample and would reduce the overall requirement by 358 homes over the plan period.

3.9 Inadequate prioritisation of brownfield developments: government recently announced that every council in England should prioritise brownfield developments and should be less bureaucratic and more flexible in applying policies that halt housebuilding on brownfield land.⁴ Binsted parishioners also support a 'Brownfield First' approach, as expressed in Binsted's 'Parish Priority Statement' of October 2023, and we feel there are opportunities to achieve this through Rural Exception sites, as discussed in Section 4.1.11 on Affordable Housing. In Alton town centre too, there are opportunities for brownfield development, presented by the town's various declining retail and commercial premises. EHDC appears to have made scant effort to take a 'Brownfield First' approach. It does not appear to be following this approach. EHDC has not put any sites on Part 2 of its register of local brownfield land; and is also not seeking to consider Permission in Principle¹⁶ (PiPs) to de-risk smaller brownfield sites.

3.10 Failure to deliver climate change goals. EHDC's proposals will not deliver EHDC's goals to mitigate and adapt to climate change. EHDC has fine words in Part B, Section 04, CLIM2 about ensuring new developments are accessible by walking or cycling. But even EHDC's own consultants express doubt that achieving "20-minute neighbourhoods" is realistic in a rural area like East Hampshire.

4. Problems specific to the three proposed development sites located within Binsted parish and the Land adjacent to Alton Sewage Treatment Works in Alton.

4.1 ALT-8: The 'strategic' site on land at Neatham Manor Farm in Binsted Parish.

BPC is extremely concerned about this site, and urges its withdrawal, for the following reasons:



View across Neatham Down



Trout in Northern Wey, just downstream

4.1.1. This site has already been assessed and rejected (for a smaller development): EHDC's [Interim SA Report \(Strategic Site Options\) February 2021](#) stated, in relation to the previous 600 house proposal: *"this area is close to the South Downs National Park and is considered to be a highly sensitive landscape with a low capacity for development in the Council's Landscape Capacity Study (2018). An option for employment development was previously considered through the LAA and SA in 2018,*

¹⁶ Granting PiP for appropriate sites is a useful tool designed to speed-up smaller housing-led development which "should be utilised wherever appropriate to de-risk sites and help bring forward housing."

prior to the Draft Plan consultation, but ultimately not taken forward for detailed appraisal. Key concerns at the time were in respect of landscape and groundwater flood risk.”

4.1.2 The proposal has doubled in size since EHDC’s 2019 ‘Large Sites Review’. The original proposal was for 650 homes, this proposal states “1,000+ homes”¹⁷ (an increase of at least 55%); and the site promoter is advocating delivery of 1,250 homes.

EHDC’s description of “1,000+ homes” simply indicates EHDC Planners’ pursuit of a ‘strategic scale residential site’ (which is defined as 1,000 homes or greater), so that they can get approval to build on the countryside outside of Alton’s settlement boundary, which otherwise would not be allowed by NPPF policies or by EHDC’s own rules.

The expanded site includes Neatham Down, Golden Chair Hill and Copt Hill. Compared with the previous proposal, development would extend much higher up the hill, and on both sides of the ridge. Development on Golden Chair Hill’s eastern slopes would have intervisibility with the National Park, and so be “within its setting”. This is a key change since 2021’s Large Development Site review.

(Note: we would like EHDC to confirm that advice provided it received to inform its Integrated Impact Assessment Scoping Report¹⁸ from the Environment Agency, Natural England and Historic England (as statutory consultees) covered the late addition of the Neatham Down expanded, ‘strategic’ site. The Executive Summary of the Scoping Report states that the consultees provided updated comments in October 2023 (which pre-dates the inclusion of the Neatham Down site).

4.1.3 The site is disconnected from Alton: Although this Site is located close to the Settlement Hierarchy Tier 1 town of Alton, and in this sense may *seem* to be a sustainable location, in reality it is separated from Alton by the busy A31 and Lynch Hill. Even with bridging over A31, it would be difficult to integrate it with Alton’s facilities. Whatever accessibility improvements are made, parts of the site would remain a 30 - 40 minute walk to the middle of Alton High Street (2km) and over a 10 minute cycle ride. This was confirmed in Terra Firma’s Landscape Value Statements of Large Development Sites (July 2020), which stated the Neatham Down site *“is offset from the existing edge of settlement by the A31 and Lynch Hill beyond, although part of Lynch Hill is within Alton’s settlement policy boundary. Despite the proximity of the A31 and the town, both have little influence on the site’s rural, undeveloped character and the site has a strong relationship with and connection to the wider landscape to the east, forming part of the countryside setting to the town.”*

4.1.4 Access. The proposed safe route for walking and cycling across the existing third-party owned A31 would be suitable only from limited parts of this very large site, and the route through the industrial estate is unattractive and far from the town centre. There is no discussion on how pedestrians will access the development across the busy A31, let alone a parent carrying two bags of shopping and trying to keep children safe. There are no cycle lanes to make it safe to reach the new Strategic Site by bicycle. The recently opened Mill Lane Alton retail park clearly shows the difficulties in providing safe pedestrian access to the shops, there being an incomplete footpath and no pedestrian facilities to help them cross the busy Montecchio Way. Also, as noted in Section 4.2, there are potential constraints over access. Without resolution, the site is unlikely to be considered deliverable.

4.1.5 An unsustainable location with high car dependency: As already stated, the site proposed would be a new settlement, largely unconnected to Alton ... an unsustainable location which undermines EHDC’s Plan Climate Objectives. EHDC’s Transport Consultants ‘Ridge and Partners’ scored the site

¹⁷ This would result in an average plot size of 980m² or below

¹⁸ www.easthants.gov.uk/media/8733/download?inline

poorly overall in its [Living Locally Accessibility Study](#), with one of the lowest minimum scores in the district, at the minimum of 4, given its inaccessible location.

EHDC itself admits that this site means high car use, and high associated carbon emissions. Distance from secondary schools, larger shops, workplaces, and transport hubs means its 1,000+ houses will have a higher than average¹⁹ car dependency (well over 1,500+ cars). The site would put further extreme pressure on already-overloaded local roads. It would cause additional traffic congestion: (i) into Alton, (ii) at junctions with A31 corridor (A31 already has bottlenecks in Ropley and Farnham and ironically, of course, was specifically designed to *bypass* Alton); and (iii) and on rural roads across Binsted and surrounding areas. Cycling infrastructure in East Hampshire is underfunded. Little progress has been made in delivering Hampshire's LCWIP, even in town centres, let alone in rural areas. Reductions in greenhouse gas emissions (from reducing carbon emissions from the site's houses, during construction and subsequently) would be undermined by this high car dependence.

All attempts at environmental sustainability are thus totally undermined: NPPF 2023's plans for environmental sustainability; EHDC's own Local Plan objectives; prioritisation of active travel (by foot and bicycle) in HCC's LTP4 Transport Plan; and BPC's Climate Action Plan.

4.1.6 EHDC's Health and Wellbeing aspirations also cannot be met at the site, not only because of the lack of safe walking and cycling routes, but also due to difficulties in securing investment for GPs, dentistry, social care and so forth. Alton's Wilson Practice is already oversubscribed by 2,700+. The proposed site is a poor location for an ageing population - which will increase by c. 36% by 2040. Whilst Surrey County Council promotes "green prescribing" for residents, EHDC appears to be considering removing green opportunities for residents.

4.1.7 Flood risk and climate resilience - [EHDC's 2018 Strategic Flood Risk Assessment \(SFRA\)](#) identifies the site is substantially affected by areas of groundwater flood risk. The edge of the proposed development is only 30m from Northern Wey River, which has flooded in recent years (and is expected to do so more frequently in future). Development will exacerbate flooding issues on-site and in the local area (e.g. in Bentley, Farnham's Coxbridge roundabout and Farnham Maltings): it will prevent rainwater from being absorbed into the ground, causing it to 'run off' into drains and placing additional demand on Alton's sewage treatment plants.

4.1.6 Inadequate local sewage treatment capacity: Both Alton Newman's Lane and Holybourne Sewage Treatment Works (STWs) frequently discharge untreated sewage into the Northern Wey, a chalk stream. Alton's STW is identified as needing investment – it cannot cope with Alton's current population, let alone any further expansion. (As this submission was being written²⁰, both STWs were discharging raw sewage.)

Decreases in invertebrates seen through Riverfly Monitoring document how the ecology of the Northern Wey chalk stream is suffering.

4.1.7 This development would put extreme pressure on the Northern Wey chalk stream. Chalk streams are classified as Biodiversity Action Plan (BAP) habitats in need of protection and, where possible, improvement. In September 2023, the government announced changes to protect England's precious chalk streams ([Changes announced to better protect England's chalk streams - Defra \(blog.gov.uk\)](#)). Chalk streams only survive when rainwater falls to the land and sinks through purifying chalk to create an aquifer that then erupts through springs, forming unique 'gin-clear' waters. The Northern Wey River's water levels and flow rates have already significantly decreased. The proposed

¹⁹ Hampshire households have an average of 1.4 cars per Household (2021 Census data.)

²⁰ On 25 February 2024.

development would seriously endanger the river, through the combined effects of preventing aquifer recharge and increasing water demand. Our concern is that the development could result in the Northern Wey River becoming a 'dead' chalk stream. In BPC's 2023 'Parish Priority Statement' we identified potential opportunities for joined-up land management along BOA17²¹ and River Wey (our parish's northern boundary). The proposed development would thwart these endeavours.

4.1.8 Neatham Down is a 'Valued Landscape', as noted in CPRE's response to the EHDC 2019 Large Development Sites consultation. "*Several factors contribute to this site being out of the ordinary, with a medium/high value rating*", with the following key aspects of value at the site:

- *The locally distinct 'bowled' topography of the site and its immediate setting.*
- *Positive characteristics of the wider Landscape Character Assessment:*
 - o *Open landscape with views across arable farmland*
 - o *A peaceful and unsettled landscape*
 - o *Part of an area with an overall strategy to conserve the open unsettled landscape with broad views across fields bound by hedgerows*
- *The site has a strong relationship, and continuity, with the countryside to the east.*

Neatham Down, Golden Chair Hill and Copt Hill High form a landscape which is of the highest quality within EHDC's Plan Area and are undoubtedly a Valued Landscape. The character of this landscape would be lost, along with views over this fine undeveloped landscape from high ground across A31 (e.g. Brockham Hill and Holybourne Down). The enjoyment of Rights of Way users crossing this 'valued landscape' towards the national park would also be compromised by the proposed development.

Neatham Down falls within an area of low landscape capacity for housing development as assessed in the East Hampshire Landscape Capacity Study. Proposing the Strategic Site at Neatham Down also does not comply with NPPF policy Para 170: "*Planning policies and decisions should contribute to and enhance the natural and local environment by: a) **protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality)**.*

Although a site's 'Valued Landscape' status does not prevent all development, the presumption is firmly against large-scale development, which can only be justified "if absolutely necessary". In relation EHDC's Policy S1, the housing numbers being proposed are excessive. NPPF parameters would justify only a significantly smaller number.

4.1.9 Development proposed on this good quality (3A) agricultural land would not conform to Policy NBE 13 'Protection of Natural Resources', nor to EHDC's policy DM12 on Dark Night Skies.

4.1.10 Affordable Housing. SDNP and EHDC have each recently stated that larger sites make it 'easier' to deliver affordable housing, since Housing Associations find management 'easier' on larger sites – this seems a weak reason for justifying a Strategic Site on an inaccessible greenfield site. We had understood that it is usually preferable for affordable housing needs in urban areas to be met on more central brownfield locations (where there is access to a wider range of facilities and the need to travel is minimised); and for affordable homes in rural areas to be delivered through rural exception sites (which Binsted Parish Council would be interested to explore.) At Neatham, the paucity of local services and facilities, and difficulties in providing subsidised bus services, are likely to thwart EHDC's ability to deliver the quantity of affordable housing required locally. Additionally, this site's crumbly chalk geology will make building here expensive, which is a further hindrance to affordability.

²¹ BOA17: Biodiversity Opportunity Area #17 runs West-East: *Hawbridge-Malms-Isington-Bentley Station*
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- 4.1.11 A new ‘village’ at Neatham Down opens the possibility of gradual and creeping coalescence** with Holybourne and, by breaching the A31 for the first time, the whole tract of countryside between the A31 and the SDNP may be perceived as being “ripe” for development.
- 4.1.12 EHDC’s proposal to create a ‘CIL island’:** it is telling that EHDC believes all CIL generated must be used to fund basic infrastructure (school, village greenspace, etc) in order to mitigate the site’s non-existent existing infrastructure. Indeed, the ‘Strategic Site’ at Neatham is likely to require substantial further amounts of infrastructure funding.
- The proposed ‘CIL island’ will deprive Binsted Parish of any CIL funding from the new development. This is unacceptable, as Binsted Parish would require a source of funding to adjust its community facilities to accommodate such a huge increase in the local population.
- 4.1.13 The proposal to build a new primary school at Neatham Down** could have a negative effect on the future viability of Binsted’s much-loved, one-class-intake primary school.
- 4.1.14 To address Policy DM8 covering historic heritage,** the Neatham Down site will need to undertake a full archaeological evaluation before determining the site’s suitability. Neatham Down is near the Roman town site at Neatham/Holybourne; there are Roman villas and a Roman road nearby; and the adjacent Monkwood earthworks (which are probably medieval).
- 4.1.15 Ultimately, we note that the site is not even needed to achieve EHDC’s required housing requirement!** The allocation proposed for this site seems completely unjustified, as the proposed numbers include the whole or part of the excessive buffer that was discussed in Section 3.7.

4.2 HOP-1: Land North of Fullers Road, Holt Pound, in Binsted parish



Views of Land North of Fullers Road

- 4.2.1 We OPPOSE the proposed change in Holt Pound’s settlement boundary and the associated proposal for 19 houses at this site and consider this proposed allocation should be withdrawn.**
- 4.2.2** This site is currently designated as ‘Countryside’. Its development would cause great loss of green space.
- 4.2.3** In 2018, EHDC assessed that *“residential development of this site ‘would have an adverse impact on the rural character of the area and is disproportionate in size to the existing settlement.’”* It was previously considered undevelopable, so this proposal represents a significant U-turn.
- 4.2.4** As detailed in Section 3.4, we are strongly opposed to Holt Pound being promoted to a Tier 3 Settlement and consider it should remain as Tier 4. As such, EHDC is unjustified in proposing to change the settlement boundary in order to bring this site into the boundary and make it developable.
- 4.2.5** Development of this site would directly contravene EHDC’s Draft Local Plan Objective B1 (Providing better quality, greener development in the right locations), which seeks to *“Make sure that new developments are located to maintain and improve the quality of built and natural environments, including our high-quality and valued built heritage and landscapes, whilst maintaining the integrity of existing settlements and their settings.”*

4.2.6 We **OBJECT** to the proposed development of this site, because:

- The site is within the countryside.
- The site is an important contributor to the character of Holt Pound.
- The disproportionate scale of development, of a type that would represent sub-urbanisation, directly contravenes Objective B1.
- The site is located within the Wealdens Heath Phase Special Protection Area buffer zone.
- The site is within the Thames Basin Heath 7km buffer zone.
- Sites of Importance for Nature Conservation (SINC) (The Willows Green/Glenbervie Inclosures, and Holt Pound Inclosure) are near to the site.
- Parts of the site and the access road are susceptible to surface water flooding and the site is bordered by the Bourne Stream.
- The site helps differentiate Holt Pound from Rowledge and Wrecclesham (more suburban areas).
- The site provides an important amenity to Holt Pound residents.
- The site is bordered by a public footpath which is popular for walkers and the development would be visible from the footpath.
- The site is very near the South Downs National Park, so intervisibility needs to be considered.
- The footpath connects through to Rowledge and Alice Holt forest – development would reduce access to these amenities.
- The site is currently used for grazing horses by the stables nearby.

4.2.7 At face value, EHDC's suggestion to permit the development of 19 houses on this large site seems a reasonable number (and preferable to previous discussions for a 117-unit retirement village on the site). However, the developer (Falcon Homes) clearly sees this as a "land and expand" operation and plans a much larger development. The developer's website <https://www.falcondevelopments.co.uk/> states: "A proposal for up to 50 homes is being promoted within the draft East Hampshire Local plan - their mockup is shown below:"

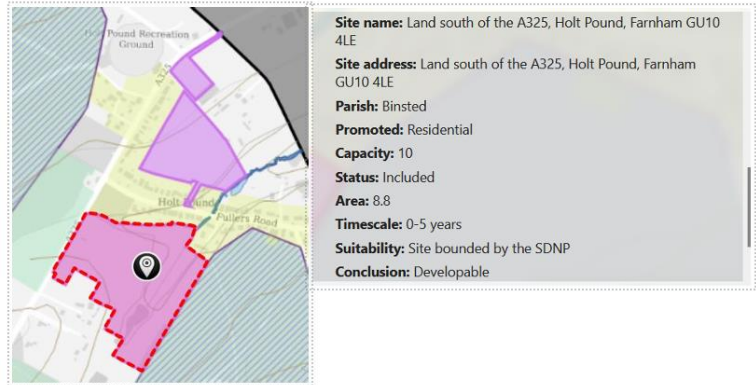


4.2.8 This proposed form of development would be at odds with Holt Pound's setting, form and semi-rural character. Its scale would be disproportionate to the size of the existing settlement and a suburban infilling of green space.

4.2.9 Development of this site would put Holt Pound's identity under threat. The precedent set by developing Site HOP-1, combined with the proposed promotion of this hamlet to Tier 3 in the Settlement Hierarchy, would create huge pressure to permit development in the many other local fields, all the way to Manley Bridge Road and Waverley in the west. This would encourage coalescence with other nearby settlements which are in Waverley (Surrey) and fall under Farnham Neighbourhood Plan: "Other Distinct Town Areas (Badshot Lea and Weybourne; Rowledge and Wrecclesham;

Rowledge and Boundstone and Rowledge and Frensham): “The southern part of Wrecclesham, marked by the linear development along Echo Barn Lane, is separated from Rowledge by an attractive valley occupied by the Bourne Stream and comprising woodland, trees, hedgerows and pasture. The valley has a high landscape sensitivity - meaning it is unlikely to be able to accommodate change without extensive degradation of character and value.” Site HOP-1 itself doesn’t fall within this defined area, but it is very nearby and has a continuation of the Bourne Stream within it.

4.2.10 If the current HOP-1 site is approved for development, it will create a huge pressure from other sites like it in the local area to gain approval for development. We note that the latest East Hants Land Availability Assessment (LAA) includes another site in Holt Pound to the south of Fullers Road (LA/BIN-012). It has not been added to the Draft Local Plan but has been assessed as ‘Developable’ in the LAA (extract shown). It is vital that Holt Pound does not lose all the countryside that surrounds it.



4.3 ALT-7: Land at Lynch Hill (LAA/BIN-008) which lies within Binsted Parish

4.3.1 This site has a complex history, with planning discussions spanning many years. BPC has made its views known through responses to previous planning applications. There were two outline consents for the site, (49776/003 and 49776/004), an outstanding reserved matters application for the whole of the site (49776/004) as well as an outstanding reserved matters application for site access for pedestrian, cycle, and vehicular access to the site from Waterbrook Road (49776/005).

4.3.2 Listed under the constraints and opportunities for this site, the question of access is noted, stating that there is a private track which runs through the site, which connects Golden Chair Farm with the Waterbrook Road, which must be factored into any reserved matters decision affecting access from the site into Waterbrook Road and how the site is laid out.

4.3.3 It is further noted that it is this privately owned track which would be required to enable pedestrian and cycle access to the proposed site ALT-8; without which access to Alton would be across the A31. It is therefore vital for the delivery of both this site and consideration of ALT-8 that there is certainty in the securing of this right of way for public access.

4.4 ALT-3: Land Adjacent to Alton Sewerage Treatment Works (which lies in Alton)

4.4.1 BPC would support the inclusion of this site for an extension to the wastewater treatment site that adjoins it, to increase the capacity of these treatment works. Alton’s Sewerage Treatment Works already has acute problems with raw sewage overflows and investment in expanded capacity is already planned. Significant further expansion of Alton’s population is already underway, even before the 1,700 houses that are being proposed in EHDC’s new Local Plan. EHDC needs to fast track its plans for future sewage treatment, including the upgrade of the adjacent facility.

4.4.2 BPC does not support the use of this site for more generic employment uses. Before granting planning permission for any alternative use, EHDC must be absolutely sure that site ALT-3 will not be needed for sewage treatment. Although this piece of land lies within an existing employment area, access, noise, and smell/environmental factors make it poorly suited to normal industrial use.