

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

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

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1.0 INTRODUCTION

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

2.0 LAND AT NORTHBROOK PARK

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

Neighbourhood Planning

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

Duty to co-operate

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

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

Further collaboration

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

- 2.5 There appears to be significant work to do with partner authorities to understand the impacts and opportunities of the site, and this will need to be further explored and reported upon before any plan can be published, to fully scrutinise the soundness of the proposed allocation. It is also suggested that the potential impact on views to and from the South Downs National Park will require that that planning authority will also need to be part of the work required to discharge the provisions of the duty.
- 2.6 The lack of any current “meaningful outcome” from the duty to co-operate provides little confidence that the site is genuinely deliverable.

Overall justification

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

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

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

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

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

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

Suitability

- 2.11 Constraints are listed in the LAA and the draft policy including:

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

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

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

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

Availability and deliverability

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

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

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

3.0 SUSTAINABILITY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Reasonable alternatives

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

4.0 BIODIVERSITY/HABITATS REGULATIONS ASSESSMENT

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

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

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

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

5.0 TRANSPORT

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

6.0 OTHER MAJOR INFRASTRUCTURE

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

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

7.0 CHARACTER & LANDSCAPE

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

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

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

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

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

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

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

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

8.0 CONSIDERATION OF THE SITE BY WAVERLEY BOROUGH COUNCIL

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

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

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

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

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

(Our emphasis)

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

9.0 CONCLUSION

- 9.1 The Bentley Action Group is not convinced that the proposed allocation of Northbrook Park for major development is sustainable. It is not justified appropriately by the Council and it is certainly not favourable when considered alongside the reasonable alternatives that have been tested through the Council's evidence. It is also telling, and material to consideration of the site by East Hampshire District Council, that the site was rejected comprehensively by Waverley Borough Council as part of its site assessment work for the recently adopted *Waverley Borough Council Local Plan Part 1: Strategic Policies and Sites*.
- 9.2 There are significant evidence gaps that the Council must seek to remedy before the next iteration of the Local Plan is available for comment. Notwithstanding this, it is considered that a predominantly car based scheme, such as that proposed at

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

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

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

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

LAA ref	Site name	Parish	Town / Local Centre	School	Doctor	National Park	SPA	SSSI	SINC	Ancient Woodland	Flood Zone 3	Listed Building	Scheduled monument	Conservation Area	Registered Park / Garden
BEN-003	Land east of Hole Lane, Bentley	Bentley	Red	Green	Green	Green	Yellow	Yellow	Green	Green	Yellow	Green	Green	Green	Green
BEN-004	Land west of Hole Lane, Bentley	Bentley	Red	Yellow	Green	Green	Green	Yellow	Green	Green	Yellow	Green	Green	Green	Green
BEN-005	Land west of Rectory Lane, Bentley	Bentley	Red	Green	Green	Yellow	Green	Yellow	Green	Green	Yellow	Red	Green	Red	Green
BEN-006	Land east of Rectory Lane, Bentley	Bentley	Red	Green	Green	Yellow	Green	Yellow	Red	Green	Yellow	Red	Green	Red	Green
BEN-007	Northbrook Park	Bentley	Red	Red	Red	Red	Yellow	Yellow	Red	Red	Yellow	Red	Green	Green	Green

CHA-004	Land at Chawton Park Farm, Site 1, Alton	Chawton	Red	Yellow	Yellow	Yellow	Green	Green	Red	Red	Green	Yellow	Green	Green	Green
CHA-005	Land at Chawton Park Farm, Alton	Chawton	Red	Yellow	Yellow	Red	Green	Green	Red	Red	Green	Red	Green	Green	Green
CHA-006	Land at Chawton Park - Employment	Chawton	Red	Yellow	Yellow	Red	Green	Green	Red	Yellow	Green	Green	Green	Green	Yellow

HD-023	Land east of Hordean	Hordean	Green	Yellow	Green	Red	Green	Green	Red	Yellow	Green	Red	Green	Green	Green
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ROP-007	Land at Ropley	Ropley	Red	Green	Red	Green	Green	Green	Red	Yellow	Green	Yellow	Green	Green	Green
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WHI-001	Land south of Walldown Road, Whitehill	Whitehill	Yellow	Green	Yellow	Red	Red	Red	Red	Green	Green	Green	Yellow	Green	Green
WHI-002	Land at Watermeadow Farm, Lindford, Bordon	Whitehill	Yellow	Green	Yellow	Green	Yellow	Yellow	Green	Green	Yellow	Red	Green	Red	Green
WHI-003	Land rear of The Royal Oak, Hollywater	Whitehill	Yellow	Green	Yellow	Red	Red	Red	Red	Green	Green	Yellow	Green	Green	Green
WHI-004	Former Garrison Church, Bordon	Whitehill	Yellow	Green	Yellow	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green
WHI-005	Mill Chase Academy and Leisure Centre, Whitehill Bordon	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green
WHI-006	Enterprise Zone (increased employment)	Whitehill	Yellow	Red	Yellow	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green
WHI-007	Oxney Farm SANG	Whitehill	Yellow	Green	Yellow	Green	Yellow	Yellow	Red	Green	Green	Green	Red	Green	Green
WHI-008	BOSC Village	Whitehill	Red	Red	Yellow	Green	Yellow	Yellow	Red	Green	Green	Green	Yellow	Green	Green
WHI-009	Annington Estate, Essex Close	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green
WHI-010	Annington Estate, BOSC South	Whitehill	Yellow	Red	Yellow	Green	Yellow	Yellow	Red	Green	Green	Green	Red	Green	Green

WHI-011	Annington Estate, BOSC North	Whitehill	Yellow	Red	Yellow	Green	Yellow	Yellow	Red	Green	Green	Green	Red	Green	Green
WHI-012	SLAB SANG, Oakhanger Road	Whitehill	Yellow	Red	Yellow	Green	Yellow	Yellow	Red	Green	Green	Green	Red	Green	Green
WHI-013	The Croft, Hogmoor Road	Whitehill	Yellow	Red	Yellow	Green	Yellow	Yellow	Red	Green	Green	Green	Red	Green	Green
WHI-014	Sacred Heart Church and nursery, High Street	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green
WHI-015	Building 84,	Whitehill	Yellow	Green	Yellow	Green	Yellow	Yellow	Red	Green	Green	Green	Yellow	Green	Green
WHI-016	Town Centre Phase 1	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green
WHI-017	Town Centre Phase 2	Whitehill	Green	Green	Green	Green	Yellow	Yellow	Red	Green	Green	Green	Green	Green	Green