

Consultation Response

To: Samantha Owen, Principal Planning Officer
From: Kevin Thurlow, Principal Policy Planner & Design Specialist
Date: 4 September 2025
Re: EHDC-25-0748-OUT

Location: Land to the rear of 136-150 London Road, Holybourne

Proposal: Outline planning application with all matters reserved except for access for a high-quality residential development comprising up to 160 dwellings, with supporting green infrastructure, open space and associated infrastructure

Development proposals should be determined in accordance with the development plan unless material considerations indicate otherwise.

The Development Plan for determining this application consists of the:

- East Hampshire Joint Core Strategy (JCS, 2014)
- East Hampshire District Local Plan Second Review (2006)
- Alton Neighbourhood Development Plan (as modified April 2021)

Key considerations

In February 2025, the Council published its Housing land supply position statement, covering the period 2024/25-2028/29. Recent changes to the NPPF have confirmed that local planning authorities such as East Hampshire District Council should identify a supply of specific deliverable sites to provide a minimum of five years' worth of housing against local housing need (paragraph 78, NPPF). At the time of writing, the Council considers that it can demonstrate 2.7 years of deliverable housing land supply, equivalent to a shortfall of 2,036 dwellings against the five-year supply that is required under national policy.

As a result of the above, paragraph 11d of the NPPF requires that a 'tilted balance' approach is applied to the presumption in favour of sustainable development, whereby the emphasis is typically on granting planning permission except where the harm of doing so would *significantly and demonstrably* outweigh the benefits. This differs to a

neutral balance, where planning permission would be refused if the harm simply outweighs the benefits of a proposal. Paragraph 14 of the NPPF adds that where there is a relevant neighbourhood plan, significant and demonstrable harm would likely result when a range of criteria are met in respect of proposals for new housing.

In the case of the Alton Neighbourhood Development Plan (as modified), this was made on Thursday 11th November 2021 and has therefore been part of the development plan for less than five years (at the time of writing). The plan also contains policies and allocations to meet its identified housing requirement for the period to 2028. Policy HO3 of the Neighbourhood Development Plan allocates six sites across Alton with a total capacity of 877 new dwellings over the period to 2028, which is greater than the development plan's housing requirement at the time the Neighbourhood Plan was made (a minimum of 700 new homes). Therefore, at the time of writing, the conditions of paragraph 14 of the NPPF are met, suggesting that in terms of the tilted balance, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits.

Nevertheless, it should be noted that since the Neighbourhood Development Plan was made in 2021, the estimated housing needs for East Hampshire have substantially increased as a result of changes to the Government's standard method for calculating housing needs. On the basis of the updated standard method, the Council has produced a document entitled: 'Neighbourhood Plans – Indicative Housing Figures' (January 2025, available [here](#)) which identifies an indicative figure of 196 dwellings per annum for Alton from 2024 onwards. This translates into 784 dwellings over the period 2024-2028. These indications of housing need are not housing requirements per se, but in comparison with the outstanding planning commitments at 1st April 2024 (which includes the allocations of the Alton Neighbourhood Development Plan) of 628 dwellings, it is clear that there is likely to be additional housing needs to be met over the period 2024 to 2028 within Alton, above and beyond the Neighbourhood Development Plan's allocations.

The tilted balance, being part of the NPPF, is an important consideration, but the decision-taker is required to take into account all material considerations and as such, can, with appropriate reasoning, still refuse an application notwithstanding the tilted balance being engaged.

The Development Plan

The adopted Development Plan is in the process of being reviewed. A new Local Plan is being prepared but none of the emerging policies and proposals have reached a stage where they would carry material weight for this planning application.

The Council has declared a climate emergency and has adopted a [climate change and sustainable construction SPD](#) (April 2022) in relation to policies CP24 and CP29 of the JCS. Although no Sustainability Checklist (Appendix 4 of the SPD) appears to have been submitted, the applicant's Design & Access Statement includes a sustainability and energy strategy. In addition to demonstrating an awareness of the importance of

good design and layout to mitigate and adapt to climate change, the DAS confirms that operational emissions for new dwellings would be reduced in accordance with the energy hierarchy, using a fabric first approach. This would be in accordance with the advice of the SPD. Should outline planning permission be granted, the sustainable construction provisions of the DAS and the SPD should be implemented through the design, layout and specification of development at the stage of reserved matters.

The following policies from the development plan (either from the JCS and the Alton Neighbourhood Development Plan) are particularly relevant for this proposal:

- CP18 – Provision of open space, sport and recreation and built facilities
- CP20 – Landscape
- CP21 – Biodiversity
- CP28 – Green Infrastructure
- CP29 – Design
- CP30 – Historic Environment
- CP31 – Transport
- DE1 – Town setting and natural assets
- DE2 – Building design and town character
- TR1 – Pedestrian networks
- TR2 – Cycle routes

Access & Movement

Vehicular access to the site would be provided via a single new road access at London Road, on the site's southern boundary. The DAS also notes that the applicant is working with the community and the highway authority to deliver improvements for pedestrians along London Road. There is no mention of improvements for cyclists here, but in accordance with the recommendations of the LCWIP (Route 200.1 Holybourne, London Road to Normandy Street), the DAS envisages a reduction in the speed limit to 20mph, which could make London Road more suitable for cycling in mixed traffic. Associated improvements for pedestrians and cyclists would be required to meet criteria b) and c) of Policy CP31 (Transport).

The DAS includes a useful Movement Hierarchy illustration. The secondary street is a vehicular through-loop that provides access to a variety of short cul-de-sacs and parking courts within the proposed developable area. This arrangement is logical, but it is noteworthy that many of the residential blocks that are created within this route framework are not enclosed by street surfaces. They are often bounded on one or more sides by green infrastructure and/or designated pedestrian routes. Whilst this creates opportunities for attractive relationships between new built form and open spaces, it also creates the potential for difficult relationships between the rear of properties and publicly accessible areas, e.g. where street environs would be created within blocks for vehicular access purposes. In such cases, there is often likely to be a need for plots and buildings to be designed to provide natural surveillance and active frontages in multiple directions, addressing both green open space on the periphery of a block and street spaces within block interiors. In respect of the illustrative masterplan, it is noteworthy that this implication appears more problematic when the proposed blocks are small and where residential density is relatively high due to the

use of terraced house types. Further discussion on the layout for new residential development is provided in the next section, below. At the outline stage, the main issue to determine will be whether the proposed upper limit of new homes (160 dwellings) could be successfully accommodated, with specific details of (e.g.) plot and building design being matters for a future reserved matters application.

The dedicated pedestrian route network provides a variety of connections to the PROW network, whilst offering routes through the centre and around the periphery of the proposed built form. There is good potential for convenient, attractive pedestrian links through well-designed greenspaces with an appropriate rural fringe character. The relationships between these routes and adjoining/nearby residential areas will be important for ensuring that the routes are well-used (convenient to access, feel safe and overlooked). The illustrative masterplan does not give full confidence in this regard due to block and plot design. For example, between the garden square in the centre of the site and the pedestrian connection in the northwest corner of the site – a distance of several hundred metres – there are only three dwellings shown directly adjoining the route, whilst visual screening, open space and plot design tends to isolate this part of the pedestrian network from other buildings. These would be matters to be considered in more detail at reserved matters stage, but at this point it is worth highlighting that further work on block, plot and building design would be necessary to ensure that the development would meet the applicant's proposed vision for the development identified within the DAS (i.e. a development for which walking and cycling is actively encouraged over the use of cars).

Layout: Built Form and Open Space

The DAS includes a useful analysis of constraints and opportunities for the site's development (Figure 5.1, DAS), highlighting the potential to improve pedestrian connections across the site through linking together existing rights of way and pedestrian infrastructure; and the potential to strengthen green infrastructure within the site to enhance local biodiversity. Areas of open space are generally located on the northern or eastern peripheries of the developable area, or as a linear route running through the centre of the site and towards the connection with the public right of way in the northwest. The manner in which these opportunities have informed the proposed layout (see Figure 5.2) is broadly supported. In addition, heritage constraints within the site and the local area have been a key influence on the proposed layout of new built form.

It will be important to ascertain whether the proposed extent of the residential blocks and road infrastructure would respect the archaeological constraints associated with the Scheduled Ancient Monument (the SAM, known as Cukoo's Corner Roman Site). I note that a relocation of the play area is 'to be explored' and that this has been highlighted on the land use parameter plan. The views of Historic England should be sought on these aspects of the proposed layout. From an urban design perspective, it is logical to include additional play and recreation facilities in close proximity to the existing sports field so that families with different play/recreation needs can spend their leisure time together. The consolidation of recreational open spaces – play and kickabout areas – could also make it easier to design new built form to appropriately address them, in order to provide an attractive backdrop and natural surveillance.

Throughout early discussions with the applicant concerning the emerging design and layout, the future purpose and character of the northern area of the SAM (to the north of the existing sports field) was queried. The main issue here is that it remains unclear why this area has been included within the application boundary, given the lack of details concerning its development, or for how it would support the development (if at all). The DAS does not provide much resolution: Figure 6.80 identifies this area as 'public open space' without identifying a specific typology, whilst the landscape concept and masterplan illustrations provide no additional information (Figures 6.82-6.84). The illustrative masterplan shows some new planting on field boundaries and identifies an existing public right of way that would connect to a proposed pedestrian route within the site. Further clarity is needed on what is being proposed within the area to the north of the sports field, given the evident intent to include the land as part of the new development.

Another area of open space that was a focus of early discussions with the applicant is the centrally located garden square and forest garden (see illustrative masterplan). The retention of mature green infrastructure within this part of the site is supported for landscape and biodiversity reasons, but this serves to define some awkward areas of open space that lack much visual or physical connection with residential blocks and plots. Whilst these spaces could provide opportunities for relaxation in natural environs and reflection in the centre of the residential area, care will be needed to ensure that they are still well-connected to nearby plots and buildings so that these areas are convenient to access, overlooked and thus feel safe to use. More detailed consideration of the function of and landscaping of this area in particular would be necessary at the stage of a reserved matters application.

The proposed residential developable area is shown in light yellow on the land use parameter plan. There are some inconsistencies between this plan and the illustrative masterplan that should be resolved, if the Council were minded to grant planning permission. In particular, the parameter plan does not show elements of the open space network that incorporate SUDS features, but instead treats them as part of the residential area. This is confusing because the sequence of proposed drainage features are integrated with new green infrastructure and form substantial elements of the open spaces. Notwithstanding this point, I have concerns over the capacity of the true developable area (i.e. excluding the SUDS features) to accommodate the maximum proposed capacity of 160 new dwellings in ways that would secure a high quality residential environment.

Although improvements have been made to the illustrative masterplan following early discussions with the applicant, block and plot designs in some areas of the site are such that there are multiple examples of awkward and potentially unattractive relationships between indicative buildings, private and public spaces. For example, the illustrative masterplan shows rear plot boundaries as extensive elements of some street scenes, or as forming the edge of the residential area at its interfaces with northern and eastern green spaces. Whilst the masterplan is indicative, it is difficult to foresee how such relationships could be avoided given the tight and compressed nature of some of the residential blocks and the ways in which they are proposed to be subdivided into plots (see Figure 6.5, page 49 of the DAS). Even if boundary treatments were to be of a high quality (as indicated within the DAS, e.g. section 6.8.6.1), the limited natural surveillance and activity between built form and the

peripheral green spaces could reduce their attractiveness and perceptions of personal safety.

The extensive requirements for vehicle parking are also an artefact of the proposed number of new homes. Whilst parking arrangements are relatively well considered in comparison with many other large residential development proposals in East Hampshire – e.g. extensive plot frontage parking has often been avoided – the areas that would be required for vehicular access, parking and turning within some of the residential blocks serves to reduce plot sizes and compress the built form, making the aforementioned adverse relationships between buildings, boundary features and their surroundings more likely. Again, Figure 6.5 of the DAS illustrates this point.

As regards the remaining parameter plans, the density parameter plan is particularly disappointing to point of being uninformative. Firstly, there is no definition, nor even an indication of what is meant by ‘medium density development area’ or ‘lower density development area’. As this is expressly a parameter plan, the lack of any quantified parameters for building density is surprising. Whilst this could be estimated through analysing the illustrative masterplan, that illustration is merely indicative and would not be approved as part of the application. Clarity is therefore needed on this point. Secondly, the parameter plan does not provide any physical reference point for determining the extents of the higher or lower density areas: there is a blurred transition between these areas within the eastern parcel of residential development, but nothing to clearly establish where one area ends and the other begins. More certainty is necessary. It should not be unreasonable to provide this certainty given the extensive design work that has clearly gone into producing the DAS.

The building heights parameter plan provides more detail by virtue of specifying the maximum ridge height of the proposed dwellings, but it demonstrates a lack of variation within the development. Given the relatively large area of the site and the different contexts for development in different areas, it is surprising that only two storey dwellings are being proposed. There could be opportunities for single or one-and-a-half storey buildings on the edges of the developable area, particularly adjoining areas of open space in the north (where the site is slightly elevated and where development would provide a new edge to the settlement). Therefore, the parameter plan should be revised with a further category showing areas of the ‘edge to SAM and green fringe’ (see section 6.8.6 of the DAS) where less than two storey development could be provided.

Proposed character areas & detailed design proposals

Although this is an outline planning application, with all matters reserved aside from access, it is noteworthy that the DAS includes much information that moves beyond matters of principle and the parameter plans, to focus on the envisaged characteristics of the new development. Four character areas have been identified within the DAS, taking into account the local context and proposed layout of new housing (see Section 6.8). It is not appropriate for me to comment in detail on all aspects of the proposals included within the DAS as permission is not being sought for these details. Rather, at this stage, it is important to note that detailed proposals will need to accord with relevant criteria of Policy CP29 (criteria a), c), d), e) and k) are likely to be especially relevant) and Policy DE2 of the Alton Neighbourhood Development Plan. In respect of

Policy CP29, criterion c), the National Design Guide establishes a set of ten characteristics of well-designed places that should be used to guide more detailed proposals. With regard to the DAS, I am generally comfortable that in many respects this document provides a good starting point to inform future proposals for the detailed design of buildings and plots subject to my over-arching comments above in relation to access, layout and built form

Conclusion

In accordance with the presumption in favour of sustainable development when the 'tilted balance' is engaged, planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In the case of this application, the conditions of paragraph 14 of the NPPF are met but there is nonetheless a shortfall in the provision of new homes in the Alton area relative to estimated housing needs of the Government's recently revised standard method, which could be substantially addressed by this proposal. There are also a number of weaknesses with the proposal in terms of relevant design policies that indicate the proposed maximum number of new homes would be too high. Positive aspects of the proposal – e.g. pedestrian connectivity through the site as part of a network of green spaces – are at risk of being undermined by relationships with built form that limit natural surveillance and could result in unattractive relationships between public spaces and private plots. This will ultimately depend on plot and building design, but the substantial work to inform the illustrative masterplan (as shown within the DAS) does not demonstrate that a development of 160 new homes would successfully avoid these weaknesses. This raises issues in terms of criteria c) and d) of Policy CP29.

There is also a lack of clarity about certain aspects of the proposal, concerning the open space to the north of the existing sports field (within the SAM area) and the parameter plans. With regard to potential heritage impacts, Policies CP30 of the JCS and DE2 of the Alton Neighbourhood Development Plan apply.

It is for the decision-maker to determine the weight that is given to these issues, but as design specialist for EHDC, I would be happy to work with the applicant and their agents to address the design-related issues.